
Privacy Notice for Stakeholder Communications

NFER’s widely respected research evaluations inform educational policy and provide sound evidence in education debates and national reviews. NFER also develops products and services for schools, informed by our evidence. We provide a wide range of marketing and information communications to share details across the education sector. This privacy notice sets out how we process your personal information as part of these activities. You can find a separate privacy notice on our website relating [to the sale of NFER tests](#).

NFER Stakeholders are considered to be, but not limited to, those from the education community, key education influencers and policy makers, clients and practitioners.

For the activities described in this privacy notice, NFER is the data controller unless stated otherwise.

1 Why are we processing this data?

Stakeholder Communications – NFER news, updates and stakeholder survey	NFER’s widely respected research evaluations inform educational policy and provide sound evidence in education debates and national reviews. NFER brings to your attention recently published research data (for example our teacher retention and turnover research), updates from our impact review and invitations to events which may be of interest to you or your organisation. From time to time, NFER may contact its stakeholders for feedback to help improve the services and products we provide.
Newsletters and information bulletins	<p>You have signed up and agreed to receive one or more of NFER e-newsletters and information bulletins, currently:-</p> <ul style="list-style-type: none"> • NFER Direct: monthly e-newsletter covering all NFER activities • NFER Classroom Round Up: termly e-newsletter for schools and teachers • NFER blog update notifications

	<ul style="list-style-type: none"> • School Partnership Manager newsletter – termly e-newsletter for schools and teachers who have purchased or expressed an interest in NFER assessment products.
One-off notifications / expressions of interests	You have asked to be notified when NFER publishes a report; or provided with specific content by NFER; or expressed interest in participating in research study or trial.
Assessment marketing information to schools	<p>We may send you emails or letters providing more information about the relevant assessment products and services that we can offer your school.</p> <p>You can unsubscribe from these communications at any time.</p>
Market research with schools	<p>NFER value gaining feedback and insights from those who work in and for schools around our resources, services and how we can best support the education community. We may send you invitations to complete surveys or participate in focus groups which NFER will run internally, or we may work with a third party supplier to carry out this market research on our behalf.</p> <p>We may also collect and use customer testimonials and photographs of pupils, with parental consent, to showcase the impact of resources and services,</p> <p>Sometimes we will commission a third party to use their resources and expertise to undertake this type of work without sharing personal data with NFER. They act as data controller and are responsible for compliance with data protection requirements. Where a third party is conducting the research and personal data is processed on NFER’s behalf, NFER is the data controller and the supplier acts as the data processor.</p>
Research participation opportunities for schools	<p>NFER relies on the participation of schools to undertake our independent research. We may send invites to select groups of schools to invite you to take part in relevant research or test development projects.</p> <p>You can unsubscribe from these invitations at any time.</p>
Research Bites for Schools	<p>NFER Research Bites are summaries of research that NFER has carried out, designed for schools and available free of charge. They contain insights and practical, evidence-based recommendations for schools on topics that affect the education sector. We may contact you to bring a Research Bite publication to your attention, where it is relevant to you or your school.</p> <p>You can unsubscribe from these updates at any time.</p>

Event management and organisation	<p>NFER occasionally works with outside organisations and industry professionals to host events on key research topics which may be of interest to you or your organisation.</p> <p>Events can be in person or online.</p>
Social media, email and website interaction monitoring	<p>We monitor your social media, email and website interactions with us. This helps us to respond to your comments and feedback, understand how NFER is perceived outside of the organisation and gain additional insight into how to share our research outputs to ever larger audiences. It also helps us understand how audiences use and engage with our digital platforms to inform improvement of our digital communications activity.</p>

2 What personal data is collected?

Stakeholder Communications	<p>We gather the following information on our stakeholders:-</p> <p style="padding-left: 40px;">Name, job title, organisation, email address, postal address and contact numbers.</p> <p>We access data which is in the public domain, as well as collect data through various networking events, client contacts and our interactions with you. This is then stored within our Microsoft Dynamics CRM software system.</p> <p>In our annual stakeholder survey, your name and position/organisation is requested to be published against any comments provided in the comment box of the survey. Your consent is requested via an opt in/out selection and if you opt in and agree to share your details, these will only be used alongside your comment if published in internal or external reports, marketing and publicity material. Your details will not be reported alongside any of your other responses and nobody at NFER will see your individual answers.</p> <p>Attendance at NFER events will also be recorded.</p>
Newsletters	<p>With your consent, we collect your name, job title, organisation and email address for the purpose of sending you communications in the form of our e-newsletters, which you have requested. If you decide that you no longer want to receive any of these emails from us, you can easily unsubscribe on an individual basis at any time via the link at the bottom of each e-newsletter.</p>

One-off notifications / expressions of interests	With your consent, we collect your name and email address to send you details of the item or content you have expressed interest in.
Assessment marketing information to schools	We collect your name, job title, organisation and email address if you have contacted us to express an interest in NFER assessment products or we are processing information held in the Education Company's SPIRIT database.
Market research with schools	<p>Depending on the nature of the market research, we may ask you for background information on yourself and your school to provide context for the rest of your answers, or we may draw on our existing database of school data which contains this information to analyse the responses against.</p> <p>Where this information is not required for the purpose of the research your responses will remain anonymous. We may ask you for your views and experiences of engaging with NFER and our resources and services, as well as your opinions on improvements and opportunities for NFER in the future.</p> <p>Focus groups may be recorded and if so, digital images of the session will be gained with your consent.</p> <p>We may request testimonials about our resources and services, and use (only with consent - see section 4) digital images of individuals engaging with our products.</p>
Research Bites for Schools	We collect your name, job title, organisation and email address if you have contacted us to express an interest in NFER assessment products or we are processing information held in the Education Company's SPIRIT database.
Event management and organisation	<p>We will ask you to provide details such as your name, email address, organisation and job title as well as any special requirements (dietary, access or other) in regards to specific events which you have been invited to.</p> <p>We will inform you of events which may be photographed and/or filmed/recorded and how you can notify us if you do not wish to be photographed/filmed. These will be used, within both print and digital channels, for publicising the work NFER do.</p>
Social media, email and website interaction monitoring	We use a number of third party services to monitor interactions with us (comments, likes, re-reposts etc) on social media, via email marketing platforms and our website platforms. If in the

	event of an enquiry, we may use your personal data to respond to your enquiry or to process your request.
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3 How have we obtained your personal data?

You will have provided us directly with most of the information we process about you. For example when you sign up to receive one of our newsletters or other communication or attend one of events.

If you have been identified as one of our key stakeholders we may have gathered your data from your organisation’s website, from social media platforms or from our team’s professional networks.

We also use The Education Company’s SPIRIT database to help us communicate directly with schools and we have extracted your data from that database. Information about how The Education Company process your data is available in their [privacy notice](#).

In these cases, we will provide opportunities to opt-out from further communications from us.

For website monitoring, we use a number of third party services which may collect your data for us.

4 What is the legal basis for processing activities?

The legal basis for processing personal data depends on the communication activity being undertaken. They are set out in the table below:

Stakeholder communications (including annual stakeholder survey)	GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’
Newsletters	GDPR Article 6 (1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’
Assessment marketing information to schools	GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’
Market research with schools	GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests

	<p>or fundamental rights and freedoms of the data subject which require protection of the personal data’.</p> <p>If focus groups, digital images, or customer testimonials are recorded, we will need your consent under GDPR Article 6 (1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’</p> <p>We ensure that clear and accessible information is provided to parents or guardians about how and why these images are used, and age-appropriate consent will be obtained.</p>
One-off notifications / expressions of interest	GDPR Article 6 (1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’
Research participation opportunities for schools	GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’
Research Bites for Schools	GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’
Event management and organisation	<p>GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’.</p> <p>When we collect any information about dietary or access requirements we also need your consent (under article 9 (2) (a)) as this type of information is classed as special category data.</p>
Social media, email and website interaction monitoring	GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’

When we rely on legitimate interest as our legal basis we have carried out a legitimate interest assessment. The assessment demonstrates that our research fulfils one of NFER’s core business purposes (normally developing products and services to improve learner outcomes). It has broader societal benefits as it contribute to meeting NFER’s mission to generate evidence and insights that can be used to improve outcomes for future generations everywhere, and to support positive change across education systems. The research cannot be done without processing personal data, but processing does not override the your interests.

5 Who will the personal data be shared with?

NFER only uses your personal information for the purpose for which it was provided. We only share data for a specific purpose which we have informed you about.

We use a third party provider, dotdigital, to manage our regular e-newsletters and stakeholder communications.

Occasionally we use a third party to conduct research, including focus groups and survey questionnaires. For example we use Public Perspectives Ltd to carry out our annual stakeholder survey and Schoolzone or The Education Company for market research with schools. Any data sharing with them will be done via a secure portal and password protected.

We use Eventbrite, a ticketing and registration platform, to help us administer sign up to specific events. Further information on how data is stored and retained is set out on Eventbrite’s [privacy policy](#).

We use third parties, like Zoom Webinar, to provide real-time online events and webinars and to help manage registration to these events. How Zoom collect, use, and process customer information is set out in the Zoom [Privacy Statement](#). The Zoom [Terms of Service](#) provides additional information.

We occasionally use a specialist third party, Buzz Education, to deliver some of our postal marketing campaigns to schools. We may use a third party for photography and filming of our events. Details are available on request.

We use a number of third party social media monitoring tools. From time to time we may also use third party organisations to support us with this work. Details are available on request.

6 Is personal data being transferred outside of the UK?

We use a number of internationally available pieces of third party software to help us provide and monitor our marketing and information communications; some of them are located outside of the UK. In all cases, such transfer only takes place under the appropriate safeguards and is in accordance with data protection laws. Details are available on request.

Note – if you have to consented to your testimonial or image being used in NFER materials, it may be shared throughout the world.

7 How long will personal data be retained?

Data is not kept longer than is necessary and is deleted in accordance with NFER’s internal policy. Where this differs for individual marketing and communication activities, this is listed below:

Activity	How long will personal data be retained?
Stakeholder communications (including annual stakeholder survey)	Stakeholder information is retained until you ask us to stop sending you these communications. If you ask to be removed from our communications list, we retain your name and email address on the system to ensure that we do not contact you again.
Stakeholder Survey	Data is retained for 3 months from date of project completion.
Newsletters	Personal information is held on our systems from date of sign up; for as long as is necessary to deliver the service or until the publication is withdrawn or you choose to unsubscribe.
One-off notifications / expressions of interest	Personal data is deleted once you have been notified of a publication or received further details of the research you had enquired about.
Events	<p>For both in person and online events:</p> <p>Attendance data and additional personal data (such as dietary, access or other) provided for a specific event is retained for 1 month from the date of the event.</p> <p>Attendance data for a specific project is kept until the end of a project and individual projects will have their own privacy notice which details the retention schedule.</p> <p>Photos, filming and recordings will be reviewed annually and retained for as long as required.</p>
Market research with schools	<p>Third parties are required to delete personal data within three months of collection, and NFER will only retain personal data related to market research for a maximum of six months unless specifically stated otherwise.</p> <p>Customer testimonials and photographs showcasing our resources and services will be retained for up to 5 years.</p>

Social media, email and website interaction monitoring	Information on social media interactions is retained for as long as necessary to ensure that NFER research, products and services are communicated to as wide an audience as possible.
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8 Can I stop my personal data being used?

NFER handles your personal data in accordance with the rights given to individuals under data protection legislation. If at any time you wish us to withdraw your data or correct errors in it, please contact the **Sales, Marketing and Impact** team.

In certain circumstances, data subjects have the right to restrict or object to processing. They also have the right to make a subject access request to see all the information held about them. To exercise any of these rights, please contact our **Compliance Officer**.

9 Who can I contact about this project?

Any queries about NFER’s stakeholder communications, please contact the **Sales, Marketing and Impact** team.

If you have a concern about the way NFER processes personal data, we request that you raise your concern with us in the first instance (see details above). If you remain dissatisfied, you can contact the Information Commissioner’s Office, the body responsible for enforcing data protection legislation in the UK, at <https://ico.org.uk/concerns/>.

10 Updates

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. The date when this privacy notice was last updated is shown in the footer at the bottom of this document.

This privacy notice was updated:

- In December 2021 to clarify what social media, email and website interaction monitoring entails.
- In June 2024 to reflect updates to our newsletter activities, market research activities, the removal of the School Leader Panel, use of The Education Company’s SPIRIT database and updates as to who third party data will be shared with.
- In December 2024 to clarify what customer testimonials entail.