

# Delivery and Evaluation of Action Tutoring Secondary Maths Programme

## Privacy Notice for School Staff

### 1 Why are we collecting this data?

Action Tutoring is a charity that supports young people facing disadvantage to achieve academically, with a view to enabling them to progress in education, employment or training. Action Tutoring does this through school partnerships, pairing high-quality volunteer tutors with pupils to increase their subject knowledge, confidence and study skills.

The Education Endowment Foundation (EEF) has commissioned the National Foundation for Educational Research (NFER) and Behavioural Insights Team (BIT) to undertake an evaluation of the Action Tutoring programme. The programme aims to look at the effectiveness of support provided to pupils in Years 7, 10 and 11 to improve their maths grades by pairing them with high-quality volunteer tutors, assisting them in building their subject knowledge, confidence and study skills.

The evaluation will take place between January 2025 and July 2026.

Action Tutoring and NFER are each independent data controllers for purposes of the data covered by this privacy notice. BIT will only use anonymised data to evaluate the effect of differences in the way tutoring is delivered. Action Tutoring's purpose is for the delivery of the programme, NFER's purpose is for the evaluation.

This is the privacy notice for school staff whose personal data is required to support the delivery and evaluation of the tutoring programme.

There is a separate privacy notice for participating pupils. All privacy notices and information sheets for this evaluation are available on [NFER's project webpage](#) and [Action Tutoring's project webpage](#).

### 2 What is the legal basis for processing activities?

The legal basis for processing personal data for the evaluation only is covered by GDPR Article 6 (1) (f):

*Legitimate interests: the processing is necessary for your (or a third party's) legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.*

NFER has carried out a Legitimate interest assessment which demonstrates that the evaluation fulfils one of NFER's core business purposes (undertaking research, evaluation, and information activities). It has broader societal benefits and will contribute to improving the lives of learners by providing evidence about the impact of tutoring on pupil attitudes towards and attainment in maths. Research cannot be done without processing personal data, but NFER will ensure data subjects' data and rights are protected.

The legal basis for processing personal data for the delivery only is covered by GDPR Article 6 (1) (f):

Action Tutoring has carried out a Legitimate interest assessment which demonstrates that the delivery of the programme fulfils Action Tutoring's charitable aims of providing high-quality tuition with measurable impact for pupils facing disadvantage, which cannot be undertaken without processing personal data, but any processing does not override the data subject's interests.

- **Legal obligation:** Action Tutoring must keep relevant accounting information to meet its audit requirements as a registered charity. Additionally, Action Tutoring may need to use or share information it holds about staff in order to comply with a legal obligation, such as to facilitate the investigation of a safeguarding concern with a local authority.
- **Consent:** In order to facilitate any additional processing of information beyond what is outlined in this privacy notice, Action Tutoring will seek consent from the relevant individuals in order to do so.

### 3 How will personal data be obtained?

Personal data will be collected directly from staff in participating schools. It will be collected initially by Action Tutoring and shared with NFER.

- Action Tutoring will collect staff data via the Partnership Agreement and the Memorandum of Understanding (MoU) when schools sign up to participate in the project.
- NFER will collect staff perceptions about the programme and evaluation directly using online surveys.
- NFER will collect data from school staff via online interviews and in-person case studies (which will be audio recorded with the participant's agreement).

### 4 What personal data is being collected by this project?

Personal data on staff in schools which will be collected by this project is described below.

- The names and contact details (school name and address, contact email address, telephone number and job role/title) of the school's key evaluation contact; Headteacher; Head of Maths; Business Manager; and link teacher nominated for each year group.
- Staff perceptions of the implementation and outcomes of the tutoring evaluation.

### 5 Who will personal data be shared with?

For the purposes of the evaluation, Action Tutoring will share with NFER the data that it has collected on staff in schools who are supporting the delivery of the intervention. Any personal data shared between Action Tutoring and NFER will be shared securely. This will include the names and roles of contacts in schools. Personal data will not be shared with any other parties.

NFER will produce a publishable report for EEF. No individual or school will be identifiable in NFER's report, unless permission has explicitly been given by the data subject. All of the findings from the evaluation will only be reported in anonymised form.

School staff data will not be shared with EEF or archived.

The online staff survey data is collected via Tivian, and it stores data in the European Union. The Privacy notice for Tivian can be found [here](#).

In the event that any case study interviews are carried out online rather than in person, Microsoft Teams or Zoom may be used for virtual interviews. Privacy notices for both online communication tools are available below:

- Microsoft Teams - [Microsoft Privacy Statement – Microsoft privacy](#)
- Zoom - [explore.zoom.us/en/privacy/](#)

Action Tutoring may share personal data with third parties such as cloud-based software services for the purposes of managing programme delivery. Information about the main software used by Action Tutoring to process data as part of programme delivery can be found below:

- Vedamo (an online tutoring platform) – [www.vedamo.com/privacy-policy](#)
- FormAssembly (an online form-building platform) – [www.formassembly.com/privacy-policy/](#)
- Salesforce (a database) – [www.salesforce.com/company/legal/privacy/](#)
- Campaign Monitor (an email communications platform) – [www.campaignmonitor.com/trust/privacy-hub/](#)

## 6 Is personal data being transferred outside of the UK?

NFER only stores personal data in the UK. When we use Tivian to administer online surveys, data is stored in the EU.

Personal information held by Action Tutoring may be shared to third parties outside of the European Economic Area (EEA) for the purposes of programme delivery. Any personal information transferred will only be processed on the instruction of Action Tutoring and where this occurs Action Tutoring will ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the EEA to a country without an adequacy decision by Action Tutoring, appropriate safeguards will be in place prior to the transfer, including through Standard Contractual Clauses. For the purposes of programme delivery, data is hosted on FormAssembly, and a central database, Salesforce. Where tutoring sessions are delivered online, video/audio recordings of tutoring sessions are stored on Vedamo, an online tutoring platform. Information relevant to you may also be recorded in other formats, such as in emails, word processing and spreadsheet applications. Information in these formats may be stored on Action Tutoring devices or in Google Workspace applications such as our Google Drive cloud storage.

## 7 How long will personal data be retained?

Action Tutoring seeks to ensure personal data is only retained for the period that it needs it for, or in accordance with laws, regulations and professional obligations that we are subject to. This means that:

- Teacher data relating to schools are retained up to ten years after a school stops being a delivery partner for Action Tutoring. This is to preserve the safeguarding record-keeping within Action Tutoring.

NFER will delete any personal data within one year of publication of the final report, which is scheduled for summer 2027. All personal data will be deleted by summer 2028.

## 8 What security is in place for personal information shared?

Both Action Tutoring and NFER take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have procedures to handle any potential data security breaches. Data subjects, third parties and any applicable regulators will be notified where we are legally required to do so. If you become aware of a potential data breach involving your personal data, please contact us immediately using the details provided at the end of this notice.

## 9 Can I stop my personal data being used?

NFER and Action Tutoring handle personal data in accordance with the rights given to individuals under data protection legislation. Under certain circumstances data subjects have the right:

- to request access to information that is held about them (a data subject access request).
- to have personal data rectified if it is inaccurate or incomplete.
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- to restrict processing of personal data (for example, permitting its storage but no further processing).
- to object to processing
- to data portability
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This helps us ensure that personal information is not disclosed to any person who has no right to receive it.

To exercise any of these rights,

- for evaluation, please contact NFER's Compliance Officer at [compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk).
- for delivery, please email [hello@actiontutoring.org.uk](mailto:hello@actiontutoring.org.uk) or write to us at: Action Tutoring, Fivefields, 8-10 Grosvenor Gardens, Victoria, SW1W 0DH. Telephone: 0300 102 0094

Although we value your participation in this evaluation and its contribution to important findings, you can withdraw from the evaluation activities at any time. If you withdraw, unless otherwise instructed, NFER will use any data we have collected up to that point in our analysis. Note that withdrawing will not impact on your school's participation in the tutoring programme. If at any time you wish to withdraw from the evaluation activities, or withdraw your data or correct errors in it, please contact your school who will then inform Action Tutoring and NFER.

## 10 Who can I contact about this project?

NFER is responsible for the day-to-day management of the evaluation. Please contact the evaluation team at: [ATEvaluation@nfer.ac.uk](mailto:ATEvaluation@nfer.ac.uk).

For details about the implementation of tutoring, please contact Action Tutoring at: [hello@actiontutoring.org.uk](mailto:hello@actiontutoring.org.uk).

If you have a concern about the way this project 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 [ico.org.uk/concerns/](https://ico.org.uk/concerns/).

Further information on this project, including information sheets and privacy notices can be found on [NFER's project webpage](#) and [Action Tutoring's project webpage](#).

## 11 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.

