

Understanding the impact of school choices for improving school attendance and engagement

Privacy Notice – Students

Please note: this privacy notice refers to the second phase of the study. No student data was processed in stage one but if you would like to read more about, there is information here: <https://www.nfer.ac.uk/for-schools/participate-in-research/participate-in-research-projects/research-on-school-approaches-to-reducing-absence-and-exclusions/>.

1 Why are we collecting this data?

The [Education Endowment Foundation](#) (EEF) and the [Youth Endowment Fund](#) (YEF) have commissioned and funded the [National Foundation for Educational Research](#) (NFER) and [The Difference](#) to carry out a study of approaches used by mainstream secondary schools to improve student attendance and engagement with school.

In this phase of the research, information about students will be used to further understand different approaches used by schools.

2 Who is the data controller?

NFER is data controller for the study and will make decisions about how and what personal data is used in accordance with the objectives of the study set by EEF and the YEF, guided by the study advisory board. We are carrying out this research in partnership with The Difference, they are a data processor on the study.

3 What is the legal basis for processing activities?

The legal basis for processing personal data from students 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.

We have carried out a legitimate interest assessment, which demonstrates that this research 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 on the effectiveness of different approaches used by schools. The research cannot be done without processing personal data, but NFER will ensure your rights are respected at all times.

A separate legal basis is identified for processing special data (see section 5 for details). The legal basis for processing special data is covered by GDPR Article 9 (2) (j):

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject..

The processing is unlikely to cause substantial damage or substantial distress to participating students and no measures will be created or decisions taken about individuals as a result of the research.

4 How will personal data about students be obtained?

As part of the statistical analysis DfE will provide NFER with deidentified student data from its National Pupil Database (NPD) for schools that responded to the survey during the first phase of this study. The purpose of this analysis is to investigate whether certain approaches used by schools are associated with lower rates of persistent absence or suspension, exclusion and unexplained school exits. Although the data from the DfE will be deidentified (student names and unique student numbers will be removed), it is still considered personal as taken together it could possibly be used to identify a student. Student data being collected includes gender, ethnicity and special educational needs and disability status - see Section 4 for full list.

Some schools that responded to the survey during the first phase of the study indicated that they could be approached to be a case-study school for the second phase of the study. As part of the case-study visits, personal data will be collected from students through face-to-face interviews.

We will also interview some parents/carers as part of the case-study visits. Parents/carers may reveal personal data about their child during the course of the interview.

5 What personal data is being collected by this project?

Where available, the following deidentified data about students in participating schools will be supplied to NFER by the DfE NPD team. Some of it, indicated with an * is considered special data by NPD:

- Unique Pupil Reference Number (UPN). This is a 13-character code that identifies individual pupils
- Month and year of birth
- Gender
- Ethnicity*
- Language*
- SEN provision and type*
- Socio-economic disadvantage status (e.g. Free School Meal (FSM) eligibility)
- Income Deprivation Affecting Children Index (IDACI) score (this is a measure of the proportion of children aged 0 to 15 living in income deprived families)

- Young carer indicator
- Service child indicator
- Child in Need/Child Protection Plan indicator
- Child Looked After indicator
- Proportion of absent sessions at primary level
- Number of authorised sessions missed due to Traveller pupil absence*
- Experience of suspension or exclusion at primary level
- KS2 maths score
- KS2 reading score.

Students may provide personal data such as views and opinions, in the course of answering questions in interviews. During these interviews students may also reveal special data (i.e. information regarding their physical or mental health, sexual orientation etc.).

We also intend to interview some parents/carers of the students we interview. These parents/carers may also provide personal data and/or special data concerning their child during their interviews.

6 Who will personal data be shared with?

No schools or individuals will be named in any report for this study.

Any personal data shared between DfE and NFER will be via the DfE NPD and the Office of National Statistics (ONS) Secure Research Service (SRS).

Personal data collected from students during interviews will be shared between NFER and The Difference for the purposes of conducting research and for data analysis.

The interviews will be audio recorded and auto-transcribed. The recordings and transcripts will not be shared with anyone outside of the research team and permission to record will be requested at the start of the interview.

7 Is personal data being transferred outside of the UK?

Some of the third-party software used may transfer data outside of the UK and to countries not considered adequate under UK data protection legislation. Where such transfers are made, they are safeguarded by use of contractual controls such as the UK Extension to the EU-U.S. Data Privacy Framework. Please contact us for further details.

8 How long will personal data be retained?

NFER and The Difference will securely delete any personal data relating to parent/carer interviews collected by the project when the final report for the project is published, currently expected in Autumn 2025.

Three months after the publication of the evaluation report, deidentified student data will be added to the EEF archive, which is managed by the Fischer Family Trust on behalf of EEF and hosted by the Office of National Statistics. This will enable the EEF and other research teams to use the

deidentified data as part of subsequent research through the ONS Approved Researcher Scheme. Further matching to NPD and other administrative data may take place as part of this research, as per statement on page 5 of this [document](#). At this point, EEF will become the data controller and is responsible for taking decisions about the means and purposes of processing. FFT Education (FFT) and the designated EEF archive evaluator will act as data processors for the archive. Further information about the EEF archive is available [here](#) and EEF's privacy notice [here](#) for more information on how EEF processes and will use your data.

9 Can I stop my personal data being used?

You (or your parent/carer) may stop your interview data being used in the study at any time until February 2025, at which point the data will have been analysed. NFER handles personal data in accordance with the rights given to individuals under data protection legislation.

If you (or your parent/carer) do not wish for your data from the School Census and the NPD to be included in the study, please contact pupilsupport@nfer.ac.uk by January 2025 and the research team will ensure that your data is not included in the analysis if this is still possible.

We appreciate your participation in the research, should you withdraw from it, NFER and The Difference will still use anything you have provided up to that point unless you indicate otherwise.

10 What are my rights with respect to personal data?

NFER handles personal data in accordance with the rights given to individual 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.

Note that some of these rights may only be possible until the data has been analysed (see Section 9 for more information). 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 these rights, please contact compliance@nfer.ac.uk.

11 Who can I contact about this project?

NFER is responsible for the day-to-day management of the study. Please contact the NFER project team with any queries at: pupilsupport@nfer.ac.uk.

If you have a concern about the way this project processes personal data, we request that you raise your concern with NFER 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/>.

12 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.