Privacy notice: Your rights, and how we will process and store your data

This privacy notice contains information for participants regarding their rights to controlling their personal data, and how EPI will process and store that data.

What personal data does EPI use for this survey?

EPI uses email addresses to invite school groups to take part in this study.

We have identified these email addresses using publicly available sources, including the government website Get Information About Schools and internet searches of school group websites.

Where possible, we verified these email addresses using data that has been provided to us, for example when individuals and organisations have worked with us or communicated with us in the past. Our use of personal data that is provided to us is regulated by our privacy policy, which states that we only ever use this personal data in a limited number of ways, including where it is necessary in order to carry out our own lawful interests, provided your rights don't override these. Our privacy policy can be found <u>here</u>.

What personal data does EPI collect?

The personal information we collect and process is provided to us directly by you in the surveys and, where relevant, interviews. This includes:

- Name, email address and telephone number of main contact in the school group
- Role title of survey respondent
- Views on the strengths and weakness of the school and school group in various topic areas in the academic years relevant to the survey

What is EPI's legal basis for processing your personal data?

EPI requires a legal basis for processing your personal data.

EPI's legal basis for processing data in this survey is our legitimate interest to promote high quality education outcomes for all children and young people, regardless of social background. We only do so where the interests and fundamental rights of individuals that require the protection of personal data do not override those interests.

The study fulfils one of EPI's core business purposes (rigorous data analysis, research and the exchange of information and knowledge to help inform the public and hold government and decision-makers to account) and we deem that it will not cause damage or distress to the data subjects. It has broader societal benefits and will contribute to the evidence base on effective practices in the school system in England.

If any special category data is processed as part of our analysis, our legal basis is UK GDPR Article 9 (2) (j) archiving, research and statistics (with a basis in law). To rely on this condition we must meet the associated condition in UK law. This is Schedule 1 (1)(4) of the Data Protection Act 2018. This condition applies if processing:

- is necessary for archiving purposes, scientific or historical research purposes or statistical purposes;
- is carried out in accordance with Article 89(1) of the GDPR (as supplemented by section 19 of the Act); and
- is in the public interest.

How will personal data be used?

You and your leadership team's responses will be treated in the strictest confidence. Only anonymised interview and survey data will be published.

EPI will use your personal data and responses solely for research purposes and to produce anonymous, statistical research findings and insights.

The data collected via interviews and surveys form part of a wider study of the performance of school groups which also uses government administrative data to derive performance metrics. In our final reports we intend to publish names of school groups alongside their performance metrics, which will be constructed from government administrative data such as the National Pupil Database, School Census, and the School Workforce Census.

Interview and survey data will be linked to school and group performance metrics for further analysis.

We will draw generalisations from the survey and interview responses where relationships are evident between responses and performance metrics. **Survey and interview responses will be discussed in aggregate and as such individual groups and schools will not be identifiable.**

Where we do publish individual responses, for example pulling out a quote from interviews, these will be anonymised. In these cases, we will apply statistical disclosure controls to ensure that the source is not identifiable through other contextual information such as school location or performance.

The data and findings produced by this project will also inform and contribute to other EPI projects which serve our mission of promoting high quality education outcomes for all children young people, regardless of social background. Where survey and interview data are used to inform other EPI projects, the same approach to anonymity will be applied.

How will EPI ensure that personal data is secure?

Survey data will be collected and stored with EPI's Smart Survey account. Smart Survey is ISO27001 certified, meaning they have an information management system that ensures they follow best practice with regards to preventing cyber-attacks and keeping their clients' data safe. They are also certified under the Cyber Essentials Plus scheme and are able to tender to public sector organisations. More information can be found <u>here</u>.

Survey and telephone interview data will be processed and stored in accordance with EPI's Management of Personal Data policy, EPI's Information Security policy and the Data Protection Act.

No personal data will be stored or transferred outside of the UK or the European Economic Area.

Our GDPR-compliant privacy policy can be read <u>here</u>.

Who will my personal data be shared with?

The survey will be administered using online survey software Smart Survey. Their privacy policy can be found <u>here</u>.

We may also share suitably anonymised datasets resulting from this study with third-party organisations. Such data shares will be subject to agreements between EPI and third-party organisations with aims that are consistent with those of this study. Contact details will not be shared with third parties.

How long will EPI retain personal data?

We keep your data only for as long as is necessary for the purposes of this longitudinal study. We will review the data that we hold no later than September 2023.

What rights do I have over my personal data?

You have the right:

- to request access to information that we hold about you (subject access request)
- to have your 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 our processing of your personal data (for example, permitting its storage but no further processing)
- to object to our processing
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

Who do I contact to exercise my rights or for any other question about the study?

If at any time you wish to exercise any of these rights and/or withdraw your data from the study, please email <u>deep.survey@epi.org.uk</u>.

If you have a concern about the way this project processes personal data, we request that you raise your concern with EPI in the first instance via <u>info@epi.org.uk</u> for the attention of EPI's Data Protection Officer. If you remain dissatisfied, you can contact the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at <u>https://ico.org.uk/concerns/</u>.

For any other question about the study, please email <u>deep.survey@epi.org.uk</u>.