

Study into supporting teachers of science engaging with and carrying out research

Sheffield Hallam University and National Foundation for Educational Research Privacy Notice

Introduction

On 25 May 2018 the General Data Protection Regulation (GDPR) replaced the Data Protection Act and now governs the way that organisations use personal data. Personal data is information relating to an identifiable living individual. Transparency is a key element of the GDPR and this Fair Processing Notice is designed to inform you about:

- how and why the Sheffield Institute of Education (SIOE) at Sheffield Hallam University (SHU) and the National Foundation for Educational Research (NFER) will use your personal data
- what your rights are under GDPR, and
- how to contact us so that you can exercise those rights.

Data Subject Rights

One of the aims of the General Data Protection Regulation (GDPR) is to empower individuals and give them control over their personal data.

The GDPR gives you the following rights:

- The right to be **informed**
- The right of **access**
- The right to **rectification**
- The right to **erase**
- The right to **restrict** processing
- The right to **data portability**
- The right to **object**
- Rights in relation to **automated decision making and profiling**

For more information about these rights please see:

<https://ico.org.uk/your-data-matters/your-right-to-be-informed-if-your-personal-data-is-being-used/>

and

<https://www.shu.ac.uk/about-this-website/privacy-policy/data-subject-rights>

<https://www.shu.ac.uk/about-this-website/privacy-policy/privacy-notice-for-research>

You can contact us if you would like to:

- request copies of your personal data held by the SHU/NFER (**a subject access request**)
- exercise **your other rights** (e.g. to have inaccurate data rectified, to restrict or object to processing)
- **query** how your data is used by the SHU/NFER
- report a **data security breach** (e.g. if you think your personal data has been lost or disclosed inappropriately)
- **complain** about how the NFER/SHU has used your personal data.

Details of who to contact are provided at the end of this statement.

Who is the work funded by?

The work we are doing is funded by the Wellcome Trust.

Why are we processing your personal data?

It is necessary for SHU/NFER to process your personal data in order to carry out research into the work you are doing as part of the Wellcome Trust's programme: *Research into supporting teachers of science engaging with and carrying out research*. This will enable SHU/NFER to carry out research on whether the projects are having an influence in terms of teacher engagement in research.

What is the legal basis for processing activities?

SHU, a public body, is the Data Controller for this research. Therefore the processing of personal data through the research is defined under GDPR as a specific task in the public interest. The legal basis for processing your personal data is 'Public Task' (Article 6 (1) (e)). NFER will be a Data Processor.

In the production of professional or academic publications or presentations, all data will be fully anonymised and no individual or organisation will be identified or identifiable. Should we wish to present or publish any information where you or your school may be identifiable, for example an exemplar case study, we will seek your consent to process your personal data.

Which Personal Data will we collect and use and how will it be obtained?

In order to provide our services we need to collect and use your personal data. Below is a list of what this may include.

Type of personal data	Project leaders or other project delivery staff	Teachers (including teacher facilitators, teacher researchers and mentors) involved in projects	Trainee Teachers
Names and contact details	x	x	x
Personal characteristics data including: years in teaching, school role, project role, key stage, phase and subject taught, school name and Unique Reference Number (URN), and project involved in	x	x	x
Interview responses (telephone, online, face to face)	x	x	x
Online survey responses	x	x	x
Focus group/group interview responses (telephone, online, face to face)	x	x	x
Classroom observations		x	
Observations of training (online or face to face) and other meetings and debriefing sessions	x	x	
Management information data collected by delivery projects on their participants e.g. attendance data		x	x

We will gather interview/focus group/group interviews/survey/observational data directly from you. The organisation running the project you are involved in will supply us with your contact details including your email address and telephone number. Management information data will also be collected by the organisation(s) running the project in which you are involved, this will include your attendance and engagement data.

No data will be collected from pupils.

Who will we share your data with?

The privacy of your personal data is paramount and will not be disclosed unless there is a justified purpose for doing so. Your data will be shared between SHU/NFER and may be shared with transcribers, who we may ask to produce transcripts of audio recordings of interviews and focus groups. If this is the case SHU and NFER will ensure that appropriate contracts and/or data-sharing agreements are in place and that the transcribers process personal data in accordance with the GDPR and other applicable legislation.

Anonymised data will be shared with the Wellcome Trust and delivery organisations, this will not include any of your personal details.

The full anonymised quantitative data generated from this research will be made available to other researchers through open access arrangements. This will not contain any personal identifiers and researchers will only be able to access the data for approved research purposes.

Is personal data being transferred outside the EEA?

Any data collected will **not** be transferred outside of the EEA.

NFER and SHU NEVER sell personal data to third parties

Security

SHU takes a robust approach to protecting the information it holds. This includes the installation and use of technical measures including firewalls and intrusion detection and prevention tools on the SHU network and segregation of different types of device; the use of tools on University computers to detect and remove malicious software and regular assessment of the technical security of SHU systems. SHU staff monitor systems and respond to suspicious activity. SHU has Cyber Essentials certification.

Alongside these technical measures there are comprehensive and effective policies and processes in place to ensure that users and administrators of SHU information are aware of their obligations and responsibilities for the data they have access to. Access to project data is restricted to the project team and administrators associated with the project. Any sharing of data with other SHU staff would require approval by the SHU ethics committee who will ensure that all data protection requirements are met. Training is provided to new staff joining the SHU and existing staff have training and expert advice available if needed.

NFER has all appropriate technical and organisational measures in place to protect personal data, and access to personal data is strictly restricted to the research team. We maintain a full Information Security Management Strategy (ISMS) and are certified to ISO/IEC 27001 (GB17/872763). The ISMS details the policies, practices, procedures, organisational structures and system functions to maintain the confidentiality, integrity and availability of information. The ISMS is translated into guidance for all staff via our Data Security Policy which is updated annually.

Any data uploaded to the NFER portal is encrypted in transit using HTTPS/TLS. All files stored on the portal are individually encrypted using AES encryption. The files are only decrypted once they are transferred to our storage array (which itself has full disk encryption). Any data you send to us is encrypted on a NetApp Storage Area Network (SAN) using AES 256 bit encryption. All NFER laptops and mobile devices are encrypted to FIPS 140-2 and accessed with pin-codes and strong passwords (minimum nine characters with alphanumeric and

special character, changed every 60 days). Laptops have TPM chips installed to help further secure the encryption in the event of loss.

Retention

On completion of the project all personal identifiers will be removed from the survey and management information data. As far as is possible personal identifiers will be removed from interview/focus group/group interview data/observation data, however these will contain contextual information so cannot be completely anonymised.

For the purposes of research and knowledge exchange including presentations at professional or academic conferences, or publications in professional or academic journals, the retention period for the data will be 10 years after the last publication arising from the research.

Any analysis of the survey and MI data after the end of the research study will be on a fully anonymised basis. As a condition of the research funding for this study from the Wellcome Trust we may be required to make this anonymised data set available to other accredited researchers through a social science open access database. For the purposes of any further analysis of interview/focus group/group interview data/observation data beyond this project, SHU will use the legal basis of 'Public Task' (Article 6 (1) (e)). NFER will have no access to this data after the end of this project.

Who can I contact if I am concerned about this work?

If you have a concern about the way this project processes personal data, we request that you raise your concern with the project team in the first instance.

Contact details

SHU:

Dr Bronwen Maxwell (SHU Project Director)
Head of Commissioned Research and Deputy Head of Centre for Research and Knowledge Exchange,
Sheffield Hallam University
S1 1WB
B.Maxwell@shu.ac.uk
0114 225 5166

You should contact the SHU Data Protection Officer - DPO@shu.ac.uk - if:

- you have a **query** about how your data is used by the University
- you would like to report a **data security breach** (e.g. if you think your personal data has been lost or disclosed inappropriately)
- you would like to **complain** about how the University has used your personal data

NFER:

Dr Julie Nelson (NFER Project Director)
Senior Research Manager
National Foundation for Educational Research
The Mere,
Upton Park,
Slough SL1 2DQ,
j.nelson@nfer.ac.uk
01753 637208

OR

The Compliance Officer
National Foundation for Educational Research
The Mere,
Upton Park,
Slough SL1 2DQ,
compliance@nfer.ac.uk
01753 574123

Wellcome Trust:

Nan Davies
The Wellcome Trust
215 Euston Road
London
NW1 2BE
nan.davies@wellcome.ac.uk
020 7611 8406

Further Information and Support

For further information about how SHU and NFER use personal data see:

<https://www.shu.ac.uk/about-this-website/privacy-policy>

<https://www.nfer.ac.uk/privacy/>

The Information Commissioner is the regulator for GDPR **and you have the right to raise concerns with the Commissioner**. The Information Commissioner's Office (ICO) has a website with information and guidance for members of the public:

<https://ico.org.uk/for-the-public/>

The Information Commissioner's Office operates a telephone helpline, live chat facility and email enquiry service. You can also report concerns online. For more information please see the Contact Us page of their website:

<https://ico.org.uk/global/contact-us/>

If you have an ongoing concern, you can contact the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at

<https://ico.org.uk/make-a-complaint/>