

**Adventure Learning Evaluation
Sheffield Hallam University
Fair Processing Notice**

Introduction

This document accompanies the Memorandum of Understanding and outlines the responsibilities of Sheffield Hallam University (SHU) in handling personal data collected from participants as part of the Adventure Learning trial and evaluation. The trial is being funded by the Education Endowment Foundation (EEF). Participants include: teachers and pupils.

From 25 May 2018 the General Data Protection Regulation (GDPR) replaces the Data Protection Act and 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 Data Protection Statement is designed to inform participants about:

- how and why SHU will use personal data collected in this evaluation
- what participants' rights are under GDPR, and
- how to contact us to exercise those rights.

This Fair Processing Notice is compliant with the Data Protection Act 2018

Participants' 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 participants 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/for-organisations/guide-to-data-protection/principle-6-rights/> and: <https://www.shu.ac.uk/about-this-website/privacy-policy/data-subject-rights/subject-access-request>

Participants can contact SHU at any time to:

- request copies of their own personal data held by SHU (**a subject access request**)
- exercise **other rights** (e.g. to have inaccurate data rectified, to restrict or object to processing)
- **query** how data is used by SHU
- report a **data security breach** (e.g. if there are concerns that personal data has been lost or disclosed inappropriately)
- **complain** about how SHU have used personal data.

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

Why are we processing participants' personal data?

It is necessary for SHU to process some personal data, in order to evaluate the impact of the Adventure Learning trial. This will help to strengthen the evidence base about the effect of Adventure Learning on character and attainment.

Retention

After the evaluation with EEF is complete, SHU will retain participants' data for research and knowledge-exchange purposes, including presentations at professional or academic conferences, or publications in professional or academic journals, for a period of ten years after the last publication arising from the evaluation. After this period, SHU will review the longer-term archival value of the data.

Respecting confidentiality

In the production of professional or academic publications or presentations, all data will be fully anonymised and no individual or school will be identified or identifiable. Should we wish to present or publish any information where a school may be identifiable, for example an exemplar case study of how a school has improved as a result of participation in the adventure learning project, we will seek the school's consent for this. Schools will be entirely free to refuse this and we would therefore ensure the school remained anonymous.

What is the legal basis for processing activities?

SHU are the Data Controllers for the Adventure Learning evaluation. The processing of personal data through the Adventure Learning evaluation 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)). <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/public-task/>

Which Personal Data will we collect and use?

In order to provide our services we need to collect and use some personal data. Below is a list of what this **may** include for the trial:

Type of personal data	Pupil	Teacher/Form tutor	School based lead
Names	X	X	X
Contact details		X	X
Personal characteristics data including: Pupil Name, UPN, FSM status and gender	X		
Character trait survey responses (self-regulation)	X	X	
Pupils behaviour survey (filled in by tutor)	X		
Progress, achievement and attainment data held by schools, and in the National Pupil Database	X		
Maths test data	X		
Data on participation in the Adventure Learning project and school practices		X	X
Telephone interview			X
Observation (of Outward Bound or Commando Joe's session)	X	X	

For SHU case study schools:

Type of personal data	Pupil	Teacher	Pastoral team	SLT	School based lead
Interview responses		X	X	X	X
Observation in school	X				
Focus group data	X	X			

Using the information we receive from schools, we will also obtain data from sources such as the DfE Schools Comparison Service and the National Pupil Database.

Who will we share personal data with?

The privacy of personal data is paramount and will not be disclosed unless there is a justified purpose for doing so. Data may be shared between SHU and:

- **EEF** for the purposes of research and evaluation. This includes submitting project data to the archive managed by the Fischer Family Trust (FFT) at the end of the project. At this point, EEF becomes a data controller, and FFT becomes a data processor.
- **The Chosen Maths Assessment** provider will mark the maths assessment paper and will have access to pupil names and SHU generated pupil ID numbers as part of this process.
- **Transcribers**, who we may ask to produce transcripts of audio recordings of interviews and focus groups. If this is the case SHU 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.

SHU NEVER sell personal data to third parties

Security

SHU takes a robust approach to protecting the information they hold. This includes the installation and use of technical measures including encryption of data, firewalls and intrusion detection and prevention tools on networks 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 also has Cyber Essentials certification.

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

Further Information and Support

For further information about how SHU use personal data see:

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

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

The Information Commissioner is the regulator for GDPR. 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/>

If there are any concerns about the way this project processes personal data, please raise these with the project teams.

Contact details

SHU

Professor Tim Jay (SHU Project Director)

Sheffield Hallam University S1 1WB

t.jay@shu.ac.uk

OR

Governance Services

City Campus, Howard Street

Sheffield S1 1WB

foi@shu.ac.uk

0114 225 5555

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/concerns/>