

## Privacy Notice

For pupils in schools participating in the evaluation of the SAFE (Support, Attend, Fulfil, Exceed) Taskforces programme

### Project Title

Evaluation of SAFE (Support, Attend, Fulfil, Exceed) Taskforces programme

Ref: 22019

### 1. Who are we and what does this document include?

RAND Europe is an independent not-for-profit research institute based in Cambridge and Brussels whose mission is to help improve policy and decision making through evidence-based research.

The Department for Education is the government department responsible for children's services and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.

The University of Westminster is a public research university based in London. FFT Education Datalab are a group of expert analysts based in London who analyse research on education policy and practice.

The Youth Endowment Fund (YEF) is a charity whose mission is to help children and young people thrive by preventing them becoming involved in violence. To this end, YEF aim to find out 'what works' and put this knowledge into practice. They were established by the children's charity Impetus and funded by the Home Office.

This document provides information on the evaluation of the SAFE (Support, Attend, Fulfil, Exceed) Taskforces. It sets out how your personal information will be collected, used and looked after in accordance with the UK General Data Protection Regulations (GDPR) and Data Protection Act 2018.

### 2. About the evaluation

The SAFE Taskforce is a programme led by local schools. SAFE Taskforces are being funded to *support* children and young people and enable them to *attend* school regularly so they can *fulfil* their potential by inspiring them to *exceed* their expectations.

The Taskforce will fund and coordinate interventions to help:

- Improve socio-emotional regulation and wellbeing
- Improve attendance
- Improve behaviour within the school and local area
- Reduce vulnerability to serious violence

To see if the SAFE Taskforces are achieving their intended outcomes, the Youth Endowment Fund (YEF) is funding this evaluation and has commissioned RAND Europe to conduct the evaluation. The aim will be to understand whether the SAFE Taskforces programme has had an impact on pupil outcomes (the 'impact' evaluation), which will be achieved by comparing data from pupils receiving interventions to similar pupils that did not receive interventions. This will help us understand if and how the SAFE Taskforces programme makes a positive impact on pupils.

You are receiving this privacy notice because you have been invited to participate in an intervention commissioned by your local SAFE Taskforce.

### 3. What data will we collect and how will we collect them?

Whilst you are participating in an intervention, RAND Europe will be collecting the following data about you from the SAFE Taskforces on a termly basis (in December, April and July of the school years 2022/23, 2023/24 and 2024/25):

- **Pupil-level data on intervention referral and attendance:** pupil name, pupil Date of Birth (DoB), unique pupil number (UPN), pupil postcode, school Local Authority Establishment number (LAESTAB) and your school's Unique Reference Number (URN), plus data on any intervention(s) you have been referred to and / or attended.

This data will be collected via the SAFE Taskforces, who will liaise with schools and/or intervention providers to receive this data.

For further information on the providers who will be delivering interventions in your school, please speak to the school headteacher/senior leadership team who will be able to share further details.

The SAFE Taskforces will use an Excel template provided by RAND Europe to input pupil data received from schools.

### 4. Who will hold your data and how will they share and use them?

RAND Europe will hold act as joint controllers for the data along with the Department for Education, the University of Westminster, and FFT Education Datalab. This means that they will all share responsibility for ensuring your data remains protected throughout the evaluation, including making sure that it is stored and shared securely. RAND Europe will lead on the data processing, that is, they will be the main point of contact for any matters relating to the protection of your personal data<sup>1</sup>.

As part of the evaluation, **RAND Europe** will ask the SAFE Taskforce in your local area to provide information about who is referred to interventions and who takes part in them (this is the 'pupil-level data' mentioned in Section 3 above). **The SAFE Taskforce** will provide this information by using an Excel data collection form provided by RAND Europe. This form will be shared via secure file transfer (Galaxkey or Egress). **RAND Europe** will in turn send a copy of that data to the Department for Education via the same method (Galaxkey or Egress).

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<sup>1</sup> By 'personal data', we mean any information about you which could be used to identify you, such as your name.

**The Department for Education** will match this data to the National Pupil Database (NPD) and the Individual Learner Record (ILR) data. These are two databases which the DfE have to hold data on pupils and learners. The DfE will pseudonymise (meaning that it will not be possible to identify you or any other pupil as a participant in this project) this data using a unique number called a Pupil Matching Record (PMR) and will pass this onto the University of Westminster and FFT Education Datalab for analysis. More information about how DfE shares personal data can be found at <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>.

**The University of Westminster and FFT Education Datalab** will use the data provided by Taskforces on pupils participating in interventions and compare their outcomes to similar pupils that did not receive interventions to measure if there is any difference between the two groups. The University of Westminster and FFT Education Datalab will securely transfer (via Galaxkey or Egress) the pseudonymised data to be stored in the YEF archive. At the end of the evaluation, pseudonymised data from the project will be stored in the YEF data archive and **the YEF** will become the sole data controller<sup>2</sup>. This means that they will be the only party responsible for ensuring your data continues to stay protected, including making sure that it is stored and shared securely.

**No individual will be named in any report or other output for this project.**

## 5. How will we store the data?

RAND Europe have put appropriate security measures in place to keep personal and special category<sup>3</sup> data secure and to prevent any unauthorised access to or use of it.

The evaluation team (RAND Europe, University of Westminster, FFT Education Datalab) will collect and store all personal data in accordance with the Data Protection Act (2018) and General Data Protection and Regulation (GDPR) requirements. RAND Europe will securely store the pupil-level data (as set out in Section 3) on the RAND Europe server. No data will be saved on servers or shared with processors outside the European Economic Area or the United Kingdom. Data analysis by the University of Westminster and FFT Education Datalab will be conducted in the ONS' SRS. This is a secure environment that can only be accessed by accredited researchers. The Department for Education will keep the data it processes securely and strictly in accordance with UK government standards.

Data transferred between the Department for Education and the evaluation team (see above for organisations this refers to) will be encrypted and use secure file transfer protocols.

## 6. How long will we keep your data?

RAND Europe, the University of Westminster, FFT Education Datalab and the Department for Education will securely delete from their servers all personal data collected as part of this study one

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<sup>2</sup> You can find more information about the YEF archive on the YEF's website:  
<https://res.cloudinary.com/yef/images/v1625734531/cdn/YEF-Data-Guidance-Participants/YEF-Data-Guidance-Participants.pdf>

<sup>3</sup> 'Special category' data is personal data that needs more protection because it is sensitive, for example health or ethnicity data.

year after the end of the project. Data about all pupils will be deposited into the YEF's data archive at the end of the project (August 2026) where it will be held for the purpose of research.

Data protection law permits us to keep personal data for long periods of time where necessary for research, archiving in the public interest, and statistical purposes. YEF will only keep your personal data for as long as it is needed in order to carry out relevant research. YEF expect this to be for a long period of time but they will carry out a review every five years to assess whether there is a continued benefit to storing the personal data in the archive, based on its potential use in future research. The YEF's privacy notice about its archive can be found here: [YEF-Data-Guidance-Participants.pdf \(cloudinary.com\)](#).

## 7. What is the legal basis for processing your data?

The legal basis for RAND Europe to process your personal data is legitimate interests detailed in Article 6(1)(f) of the UK GDPR. The legal basis for processing your special category data is because it is necessary for archiving purposes in the public interest, scientific, or historical research purposes as detailed in Article 9(2)(j) respectively of the UK GDPR. To ensure that all processing is fair and lawful, RAND Europe have also completed a Legitimate Interest Assessment and a Data Protection Impact Assessment, in addition to the completion of an application to the RAND internal review board for ethical approval. RAND Europe will process only what is required to meet these legal bases and will ensure security and safeguards are in place to protect the information.

The legal basis for the Department for Education, the University of Westminster, and FFT Education Datalab to process your personal data is where it is necessary for the performance of a task carried out in the public interest as set out in Article 6(1)(e) of the UK GDPR. The specific legislation which allows this is Section 10 of the Education Act 1996. The legal basis for processing special category data is for reasons of substantial public interest as detailed in Article 9(2)(g) of the UK GDPR.

The Department for Education has also conducted a Data Protection Impact Assessment and its Data Sharing Approval Panel will ensure any sharing of data through the ONS's Secure Research Service meets ONS's 'five safes data protection framework' to ensure that the people, projects, settings, data, and outputs are safe.

## 8. What are your rights?

RAND Europe, the University of Westminster, FFT Education Datalab and the Department for Education operate in accordance with the Data Protection Act 2018 and UK GDPR requirements. You are provided with certain rights that you may be able to exercise through us. In summary, those rights are:

- To access your data ("data subject access request") (Article 15 of the GDPR)
- To have inaccurate personal data rectified (Article 16 of the GDPR)
- To have your data erased (Article 17 of the GDPR)
- To restrict the processing of your data (Article 18 of the GDPR)
- Object to processing of your personal data (Article 21 of the GDPR)

## 9. How do you contact us?

If you have any questions about the study or your rights, you can get in touch by:

- Sending an email to the evaluation team – Dr Lydia Lymperis ([safeevaluation@randeurope.org](mailto:safeevaluation@randeurope.org))
- Calling the evaluation team by ringing +44 1223 353 329 and quoting Ref: 22019 “SAFE”
- Contacting RAND Europe’s Data Protection Officer (DPO), Rani Viknaraja ([rviknara@randeurope.org](mailto:rviknara@randeurope.org)) and quoting Ref: 22019 “SAFE” or in writing to Data Protection Officer, RAND Europe, Westbrook Centre, Milton Road, Cambridge, CB4 1YG, UK
- Contacting the FFT Education Datalab’s Data Protection Officer, Helen Robinson:
  - Via email: [dpo@fft.org.uk](mailto:dpo@fft.org.uk)
  - By phone +44 01446 776 262
  - In writing: Helen Robinson (DPO), FFT Education Ltd, 1st Floor, 79 Eastgate, Cowbridge, Vale of Glamorgan, CF71 7AA.
- Sending an email to Malcolm Bacon, University of Westminster ([dpa@westminster.ac.uk](mailto:dpa@westminster.ac.uk))
- Contacting the Department for Education’s Data Protection Officer, Emma Wharram:
  - Via email: [dataprotection.office@education.gov.uk](mailto:dataprotection.office@education.gov.uk)
  - In writing: Data Protection Officer, Department for Education (B2.28) 7 & 8 Wellington Place Wellington Street Leeds LS1 4AW.
- Sending an email to the Youth Endowment Fund ([hello@youthendowmentfund.org](mailto:hello@youthendowmentfund.org))

If you would like to withdraw from the evaluation, you must complete the attached withdrawal form and return it to your school’s SAFE liaison contact. This will mean that your data will not be collected or will be deleted if already collected<sup>4</sup>. Withdrawing from the data collection will have no negative consequences to you, and you can continue to participate in the programme. We will maintain a log to store any such requests that we receive. If you do not wish to receive any support from the actual programme, please speak to your school leaders directly to inform them of this.

If you request information from us, we will need to confirm your identity to ensure the security of your data. We will try to respond within 30 days but our response time may vary depending on how complex your request is. A fee will not normally be charged unless a request is considered to be without basis, repetitive or excessive. Where we request a fee, it shall always be reasonable.

You also have the right to contact the Information Commissioner’s Office in the UK if you have any concerns about the processing of your data by the evaluation team. You can visit [ico.org.uk](https://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk). Alternatively, you can write to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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<sup>4</sup> Note that it may not be possible to delete your data once the final evaluation report has been submitted for publication, that is after August 2026.