

**UCL and IOP Data Privacy Notice  
for participation in the  
EEF AND WELLCOME TRUST KEEP TEACHING EVALUATION**

Dear Head Teacher,

We are writing to provide you with a privacy notice which describes how and why we use your personal data, collected due to your school's participation in the Education Endowment Foundation (EEF) and Wellcome Trust Teaching Evaluation project. The objective of the KEEP Teaching trial, funded by the EEF and Wellcome Trust, is to understand and evaluate the potential benefits and impact of the KEEP Teaching programme. The 2021 trial is already underway and recruitment for this has now closed. However, we are inviting schools and ECTs to participate in a timetable analysis project which supports the KEEP Teaching trial, by providing data about physics ECTs' timetables. The timetable collection activity will run during the autumn term of 2021 and spring term of 2022, with surveys with schools and ECTs completed by July 2022. This project is being managed by the Institute of Physics (IOP) and the Institute of Education within UCL (UCL).

***IOP and UCL use of your personal data***

This letter details the ways IOP and UCL will be handling your personal data as part of this project (UCL and IOP together “we”, “our” and “us”). UCL and IOP are each separate data controllers. This means that UCL and IOP are each separately and independently legally responsible for the personal data each collects and/or holds about you when acting in a data controller capacity.

IOP acts as data processor for UCL for all data collected in the Memorandum of Understanding. It is only a data controller in relation to the Head Teacher's data so provided.

It is very important to us that we handle your personal data responsibly and in accordance with the law; providing information about how we use your personal data, in this privacy notice, is an important part of that.

***What is Personal Data?***

'Personal data' means any information which identifies you as an individual. It may include your name but it may also be other information such as your date of birth, nationality and gender which when combined identify you. This information may be collected in a variety of ways, including electronically, in paper form, by telephone or in person.

Some of this notice involves rather technical terms, which we've left in so you know the official concepts we are talking about. We've tried to keep the explanations as simple as possible. If you have any questions now, or at any point during this project, then you should contact a member of the team with the first point of call being the Institute of Physics ([KEEPTeaching@iop.org](mailto:KEEPTeaching@iop.org)) and David Wilkinson at UCL Institute of Education ([d.wilkinson@ucl.ac.uk](mailto:d.wilkinson@ucl.ac.uk)).



## How we use your personal data

- **Personal data we collect about you**

### UCL

- UCL may *indirectly* collect the following personal data about you:
  - name and contact details – from IOP as UCL’s data processor; and

### IOP

- IOP may collect the following personal data from you:
  - name and contact details

- **Purposes for which we process your personal data and the legal bases for processing**

Overall, we will use your personal data to carry out the research project. Any reports or publications arising from the research project will not include any personal data.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this notice, including having a "legal basis" for the processing. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions.

UCL and IOP both perform different roles in this project and use your personal data for different purposes, relying on different legal bases. This table sets out what we do with your personal data and why, divided into activities performed by UCL and IOP separately – as each is a separate controller of some of the personal data collected as part of this project.

Purpose	Legal Basis
<b>UCL</b>	
UCL as data controller instructs IOP to collect your data on its behalf and collects your personal data from IOP, in order to contact you and facilitate the project.	<b><u>Performance of a task in the public interest</u></b> UCL will be processing personal data in its capacity as a public authority in connection with its core purposes of research and innovation. Please see UCL’s <a href="#">Statement of Tasks in the Public Interest</a> for further information.
UCL as data controller uses your personal data to communicate with you about the project.	
<b>IOP</b>	
IOP uses your personal data as data controller for communication purposes, to make contact about the research project during the intervention stage of the project.	<b><u>Legitimate interests</u></b> IOP has a legitimate interest in improving the retention of Physics Newly Qualified Teachers which is consistent with its Charter and status as a charitable organisation.
IOP collects and shares your name and contact details with UCL as data processor, in order for UCL to perform the research project.	IOP’s processing on behalf of UCL falls under UCL’s legal basis as set out above.

- ***Who do we share your personal data with?***

Your personal data may be disclosed to other organisations as required by law, for crime prevention, investigation or detection purposes or in order to protect your vital interests.

**UCL**

Your personal data will be collected and processed primarily by our staff. UCL access to your personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job at UCL. UCL may have to share your personal data with the parties set out below:

- UCL uses the services of various external service providers to help it run UCL efficiently, particularly in relation to our IT systems. Some of these services (such as email hosting and data backups) involve the service provider holding and using your personal data. In each case, where UCL shares your information with one of our service providers, the service provider is required to keep it safe and secure. They are also not permitted to use your information for their own purposes.

UCL requires all third parties to respect the security of your personal data and to treat it in accordance with the law. UCL does not allow its third party service providers to use your personal data for their own purposes – UCL only permits them to process your personal data for specified purposes and in accordance with its instructions.

**IOP**

Your personal data will be collected and processed primarily by our staff. IOP access to your personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job at IOP. IOP may have to share your personal data with the parties set out below:

- IOP discloses your personal data to UCL in order for UCL to contact you and facilitate the project, as set out in this letter.
- IOP uses the services of various external service providers to help it run IOP efficiently, particularly in relation to our IT systems. Some of these services (such as email hosting and data backups) involve the service provider holding and using your personal data. In each case, where IOP shares your information with one of our service providers, the service provider is required to keep it safe and secure. They are also not permitted to use your information for their own purposes.

IOP requires all third parties to respect the security of your personal data and to treat it in accordance with the law. IOP does not allow its third party service providers to use your personal data for their own purposes – IOP only permits them to process your personal data for specified purposes and in accordance with its instructions.

- ***How we protect your data?***

We have each put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have each established procedures to deal with any suspected personal data breach and will each notify you and any applicable regulator of a breach where we are legally required to do so.

The data we hold will be kept securely at all times, transferred using secure (encrypted) methods, and kept on secure computer systems at UCL and IOP's offices under password protection. We will never disclose the name of the school or any personal data collected from the study in any report arising from the research, and we will not include any information that could otherwise identify you or your school.

- ***How long do we retain your personal data?***

**UCL**

- UCL will de-identify information wherever possible (anonymisation or pseudonymisation). Information where you can be identified will, as such, be kept for a minimum amount of time and in accordance with the research objectives.
- For some aspects of the research project, UCL cannot de-identify your information as it is necessary for achieving the outcome of the research. For such aspects, UCL will need to store your personal information as part of the research for the duration of the project and for a defined period after the project has ended. This is usually defined by external regulations but may be defined by our own policies and procedures.
- Your personal data will be processed by UCL only for the purposes of this research project. Your personal data will not be kept for more than 10 years, in line with UCL's policy on storing research data, after such time, your personal data will be anonymised.
- Further details about how long personal information obtained for research is kept can be found in UCL's [Data Retention Schedule](#).

**IOP**

- Your personal data will be processed by IOP only for the purposes of this research project. Your personal data will not be kept for longer than is necessary for this purpose. After such time, the data will be securely destroyed.

- ***Transfers outside the European Economic Area***

**UCL**

- There are circumstances in which UCL may transfer your personal data outside the EEA, e.g. where UCL uses a third party cloud services provider based outside the EEA to store personal data.
- Where UCL transfers your personal information across national boundaries to a third party, such as one of our service providers, UCL will protect your personal information by ensuring that those transfers are made in compliance with all relevant data protection laws. Generally, this means

where UCL transfers your personal information to a third party that is located in a country which does not have adequate privacy protection, UCL will put in place a contract with the third party that includes the standard international data transfer contractual terms approved by the European Commission. For further information on the measures in place, please contact UCL using the details set out in the '*Who do I contact with questions?*' section below.

### IOP

- There are circumstances in which IOP may transfer your personal data outside the EEA, e.g. where IOP uses a third party cloud services provider based outside the EEA to store personal data.
- Where IOP transfers your personal information across national boundaries to a third party, such as one of our service providers, IOP will protect your personal information by ensuring that those transfers are made in compliance with all relevant data protection laws. Generally, this means where IOP transfers your personal information to a third party that is located in a country which does not have adequate privacy protection, IOP will put in place a contract with the third party that includes the standard international data transfer contractual terms approved by the European Commission. For further information on the measures in place, please contact IOP using the details set out in the '*Who do I contact with questions?*' section below.

### ● **Your Rights**

Subject to certain conditions, under data protection law, you have rights in relation to your personal data that can be exercised against the controller of your personal data. As noted above, UCL and IOP are separate controllers of data, as we separately decide on the purpose and means of using certain data collected as part of the project, and so are responsible separately for the personal data we collect and hold about you when acting as a data controller (please see the section above on purposes for more information). Please consider, when making your request, which of us (or both of us) you wish to make the request to. Details of how to make a request can be found in the section entitled "*How can I access my personal information and exercise my rights*" below. These rights are as follows:

- **Right 1:** A right to access personal data held by the controller about you (please see section entitled "*How can I access my personal information and exercise my rights*" below).
- **Right 2:** A right to require the controller to rectify any inaccurate personal data held by it about you.
- **Right 3:** A right to require the controller to erase personal data held by it about you. This right will only apply where, for example, the controller no longer needs to use the personal data to achieve the purpose it was collected for; or where you withdraw your consent if the controller is using your personal data based on your consent; or where you object to the way the controller processes your data (in line with Right 6 below).
- **Right 4:** A right to restrict the controller's processing of personal data held by it about you. This right will only apply where, for example, you dispute the

accuracy of the personal data held by the controller; or where you would have the right to require the controller to erase the personal data but would prefer that its processing is restricted instead; or where the controller no longer needs to use the personal data to achieve the purpose it was collected for, but the controller requires the data for the purposes of dealing with legal claims.

- **Right 5:** A right to receive personal data which you have provided to the controller in a structured, commonly used and machine readable format. You also have the right to require it to transfer this personal data to another organisation.
- **Right 6:** A right to object to the controller's processing of personal data held by it about you.
- **Right 7:** A right to withdraw your consent where the controller is relying on it to use your personal data. Note that a withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- **Right 8:** A right to ask the controller not to use information about you in a way that allows computers to make decisions about you and ask it to stop.

It is important to understand that the extent to which these rights apply to research will vary and that in some circumstances your rights may be restricted. In certain circumstances, the controller may also need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and its interests (e.g. the maintenance of legal privilege).

- **Keeping personal data up-to-date**

Data protection law requires us to take reasonable steps to ensure that any personal data we process is accurate and up-to-date. Please help us to do this by advising us of any changes to your personal data.

- **How can I access my personal information and exercise my rights?**

**UCL**

As noted above, you have certain rights, including the right to access information held, by UCL, about you. Your rights can be exercised, at any time, by contacting UCL at [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) or Data Protection Officer, UCL Gower Street, London WC1E 6BT. Details are set out in UCL's [Data Protection Policy](#).

**IOP**

Your rights, including the right of access to information held, by IOP, about you can be exercised, at any time, by contacting IOP at [governance@iop.org](mailto:governance@iop.org) or Governance and Compliance Manager, Institute of Physics, 37 Caledonian Road, London N1 9BU.

- **Automated processing**

We do not use automated processing and decision making without manual intervention.

- **Who regulates the use of my personal information?**

### UCL

UCL maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the UK's data protection laws. Our registration number is Z6364106 and this registration sets out, in very general terms, the full range of purposes for which we use personal data.

### IOP

IOP maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the UK's data protection laws. Its registration number is Z6802378 and this registration sets out, in very general terms, the full range of purposes for which we use.

- **Who do I contact with questions?**

If you have any questions about your personal data that are not answered by this privacy notice then please consult:

- UCL's data protection web pages [here](#), where further guidance and relevant UCL policy documentation can be found; or
- IOP's privacy notice [here](#), where further information can be found.

If you need further assistance, please contact, as appropriate, UCL or IOP:

- UCL's Data Protection Officer: [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) or Data Protection Officer, UCL Gower Street, London WC1E 6BT; or
- IOP's Governance and Compliance Manager, responsible for IOP's data protection management, who can be contacted at [governance@iop.org](mailto:governance@iop.org).

If UCL and or IOP (as relevant) are unable to adequately address any concerns you may have about the way in which it uses your data, you have the right to lodge a formal complaint with the data protection authority in your country or with the Information Commissioner's Office (both UCL and IOP's main data protection regulator). Full details may be accessed on the complaints section of the Information Commissioner's Office website.

Once again, we are extremely grateful to you for supporting this project. We hope to learn a lot about the role supporting ECTs of Physics can play in aiding teacher retention and well-being as well as supporting pupils' learning.

Yours sincerely,

David Wilkinson  
UCL Institute of Education