

# Privacy notice

## Talking Time evaluation

### Introduction

Your child's early years setting is participating in a research project testing the impact of a programme called 'Talking Time'. Talking Time includes activities and games designed to develop children's speaking and listening skills.

The Talking Time project is a collaboration between the Education Endowment Foundation (EEF), the Thrive Together Early Years Stronger Practice Hub (SPH), the Liverpool City Region and Beyond Early Years SPH, the REACHout Early Years SPH, A Brighter Start Early Years SPH, the University of Oxford, University College London (UCL) and the Institute of Education and the National Institute of Economic and Social Research (NIESR). Together, these parties (with the exception of the EEF and the SPHs) are referred to as the 'Research Team' in this Privacy Notice. The roles of each of these organisations are:

- The EEF and the SPHs named above are the funders of the project.
- As part of the [Department for Education's Early Years Recovery Programme](#), Stronger Practice Hubs and the EEF are working together to fund Early Years settings' access to evidence-informed programmes and study the programme's influence on practice and children's outcomes. This initiative aims to support education recovery following the pandemic, whilst also developing our understanding of effective professional development in the early years. The SPHs taking part in Talking Time are named above.
- The University of Oxford and UCL Institute of Education will be responsible for designing and delivering the programme.
- NIESR will evaluate the impact of the programme on children's outcomes, supported by a team from another research organisation, Qa Research. They will also explore practitioners' experiences of the programme and their perceptions of its impact.

This privacy notice sets out how the Research Team will collect and use your personal data.

After your child's setting has shared personal data of children taking part in the project with the Research Team, each member of the Research Team will become an independent data controller of this personal data in order to perform their roles (set out above).

**Your child's data will be treated with the strictest confidence and processed in accordance with the GDPR and the Data Protection Act 2018. We will not use your child's name or the name of the school in any report arising from the research.**

If you have any questions about this privacy notice, including any requests to exercise your legal rights in relation to your personal data, please contact NIESR in the first instance.

**NIESR**

NIESR, 2 Dean Trench Street, Smith Square, London, SW1P 3HE  
**Email:** TalkingTime@niesr.ac.uk

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, we might be able to address your concerns, so please contact NIESR first.

We promise to respect any of your personal data which is under our control and to keep it safe. This privacy notice sets out what we will do with the data, and we will let you know of any material changes to this notice.

The Research Team deals with and shares your personal data according to a data sharing agreement between the Research Team members. The agreement sets out the purposes for which we may process and share your personal data and our agreement to cooperate to protect your personal data and deal with any requests you may have.

### What kind of information do we collect?

Your child's setting will share the following information with the Research Team

- Child name
- Setting name
- Date of birth
- Gender
- Eligibility for the Early Years Pupil Premium
- Additional needs e.g. whether they need any extra support with their oral language or have language-related SEND
- Records of attendance at Talking Time sessions
- The main languages spoken at home and whether English is an Additional Language (EAL) for your child

NIESR will access and link the above data to background and setting data held on the National Pupil Database (NPD). The NPD data to be requested will include whether or not a child is eligible for the Early Years Pupil Premium as well as their gender.

NIESR will match the information listed above to data on child outcomes. This will include data from assessments carried out as part of the project. These are standard assessments of language skills. These assessments will be administered by a team from Qa Research. These assessments will only be used to enable the research team to identify whether the Talking Time programme has an impact on the oral language skills of young children.

As part of the project, but only with your explicit consent, your child might be involved in:

- Audio recordings of two book sharing sessions (two at the start and two near the end of the project)
- Video recordings of Talking Time sessions as part of the mentoring and feedback to practitioners that forms part of the programme; and to see how the programme is implemented in settings.
- Implementation records, including weekly records of Talking Time sessions attendance.

Where parents have given consent for audio **and video recordings** of their child, these recordings **will only be created and shared with** the University of **Oxford** team **where parents have given consent**. As UCL is a joint data controller with the University of Oxford for the audio recording, the Oxford team may share these data with the team at UCL for the purposes of research.

## What do we do with the information we collect?

Each organisation will use the data for different purposes:

### University of Oxford and UCL Institute of Education

- To run the programme in early years settings and understand how it is implemented
- To act as the main point of contact for settings
- To assess the impact of the programme on practice in early years settings, exploring whether the programme has an impact on the way in which practitioners speak with children
- To contact settings when the evaluation report is published
- To contact settings with programme updates and future Talking Time events, if the setting indicated its consent to being contacted after the programme delivery

### NIESR

- To monitor and evaluate the implementation of Talking Time
- To conduct the randomisation of settings (i.e., to randomly allocate settings to receive or not receive the programme)
- To match data received from settings to NPD data and child outcome data
- To contact settings about staff participating in interviews, and to conduct those interviews
- To instruct and liaise with Qa, whose independent trained staff will carry out the tests and to oversee the collection of data on children's outcomes
- To evaluate the impact and effectiveness of the programme and prepare a report about the project

### EEF

- At the end of the project, child outcome data will be submitted to the EEF's data archive which is managed by the Fischer Family Trust (FFT). At this point, EEF will become a data controller and FFT will be a data processor

We will only use your child's data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

For the purposes of research and archiving, outcome data will be linked with information about the children from the National Pupil Database (NPD) and shared with the University of Oxford, University College London, the Department for Education, the EEF, the EEF's archive manager, the Office for National Statistics and potentially other research teams. Further matching to NPD and other administrative data may take place during subsequent research.

### **What is the lawful basis for processing your personal data?**

We will only use your personal data where we have a lawful basis for doing so.

- NIESR's legal basis for processing personal data is 'legitimate interests'. The evaluation of Talking Time fulfils one of NIESR's core purposes (undertaking research, evaluation and information activities) and is therefore in our legitimate interest, that processing personal information is necessary for the conduct of the evaluation. Our condition for processing special category personal data is that this is necessary for scientific research purposes and is in the public interest.
- The University of Oxford and UCL Institute of Education's lawful basis for processing data is 'public interest task.'
- When the EEF becomes data controller at the end of the project as the child outcome data is submitted to the data archive, the legal basis for processing personal data is 'legitimate interests'. These legitimate interests include gathering data about what educational interventions work best, under what conditions, for which pupils, with a view to increasing attainment and reducing educational disadvantage.

### **Who else has access to your information?**

The Research Team may disclose your information to third parties in connection with the purposes of processing your personal data set out in this notice. These third parties may include suppliers, research assistants, trusted academic partners and subcontractors who may process information on behalf of the Research Team to carry out such work as administering tests, undertaking interviews, transcribing interviews and archiving data. They will also include the Talking Time mentors, who will process data for specified purposes including programme delivery and mentoring. In all cases, the Research Team will ensure that these third parties enter into appropriate data processing agreements with us and that they keep your personal data secure and confidential. Where your data is shared with third parties, we will seek to share the minimum amount necessary.

We may also disclose your personal information if required by law, or to protect or defend ourselves or others against illegal or harmful activities, or as part of a reorganisation or restructuring of our organisations.

## International Transfers

Your personal information will not be transferred outside of the EEA.

## Security

We take all reasonable steps to protect your personal information and follow procedures designed to minimise unauthorised access, alteration, loss or disclosure of your information.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data Retention

We ensure that your data is securely stored, using secure servers located within the UK. Paper copies of consent forms will always be kept in a locked filing cabinet at the Department of Education at the University of Oxford. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When it is no longer necessary to retain your personal data, it will be securely deleted.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

- € NIESR will delete any personal data six months after the completion of the project, that is, on publication of the final evaluation report
- € The University of Oxford will delete staff contact details after the delivery of the programme, unless staff members consent for their details to be kept on record for the purpose of sharing the evaluation report, details of Talking Time events and programme updates
- € The University of Oxford will keep all other personal data for three years following the publication of the final evaluation report. Thereafter, these data will be securely deleted.
- € NIESR will send the child outcome data to the Fischer Family Trust (FFT) archive within three months of project completion. FFT will keep the data on behalf of EEF, at which point EEF take responsibility for Data Protection Compliance

Please note that, under Data Protection legislation, and in compliance with the relevant data processing conditions, personal data can be kept for longer periods of time when

processed purely for archiving purposes in the public interest, scientific or historical research, and statistical purposes.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data and that of your child, including rights:

- To request access to your or your child's personal data: this enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it
- To request correction of your or your child's personal data: this enables you to have any incomplete or inaccurate data we hold about you corrected
- To request erasure of your or your child's personal data: this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it
- To object to processing of your or your child's personal data: you can object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms
- To request restriction of processing your or your child's personal data: This enables you to ask us to suspend the processing of your personal data
- To request transfer of your or your child's personal data
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you wish to exercise any of the rights set out above in connection with this research project, please contact [TalkingTime@niesr.ac.uk](mailto:TalkingTime@niesr.ac.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Changes to this Notice

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear by contacting your child's nursery setting and ensuring they provide you with an updated version of this Privacy Notice.

### **Company details for the Research Team and Funder**

- NIESR is a company listed by guarantee registered in England, and a registered charity.
  - Company Number: 341010
  - Charity registration number: 306083
  - Registered office: NESR, 2 Dean Trench Street, Smith Square, London SW1P 3HE
  - Email: [TalkingTime@niesr.ac.uk](mailto:TalkingTime@niesr.ac.uk)
- The University of Oxford is a civil corporation. The University enjoys charitable status as one of the exempt charities listed in Schedule 3 to the Charities Act 2011
  - Registered office: University Offices, Wellington Square, Oxford, OX1 2JD
  - Email: [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk)
- The Education Endowment Foundation is a charity registered in England
  - Registered office: Millbank Tower, 21-24 Millbank, London SW1P 4QP
  - Charity registration number: 1142111
  - Company number: 07587909
  - Email: [info@eefoundation.org.uk](mailto:info@eefoundation.org.uk)