

Privacy Notice for evaluation of HFL Education's Making Fluent and Flexible Calculators Programme.



HFL Education's Making Flexible and Fluent Calculators Programme (MFFC) is a whole-class intervention for Year 7 students designed to run alongside the KS3 maths curriculum. It focuses on securing foundational learning and explicitly teaching additive calculation strategies and the connectedness between calculations. HFL Education is partnering with the Education Endowment Foundation (EEF) and The Policy Institute, King's College London, to invite state-funded mainstream schools in England with low prior attaining Year 7 students in 2025 to take part in an evaluation of the programme.

This Privacy Notice explains why and how Herts for Learning Limited t/a HFL Education ('the Company', 'we', 'us' or 'our') collect, use and process Personal Data for the Making Flexible and Fluent Calculators intervention evaluation, and ensure that it is kept safe. It is also designed to let you know your rights and what you can do if you have questions about Personal Data.

This document sets out the types of Personal Data (meaning information about an individual from which that individual can be personally identified) we handle, the purposes of handling those Personal Data and any recipients of it.

For the purposes of data protection laws the Company is the data controller.

We are committed to ensuring that the privacy and security of your personal information is always protected. Any personal information that you provide us with will be handled in accordance with this Privacy Notice.

1. Our details

We are Herts for Learning Limited t/a HFL Education (HFL)

Address: 1st Floor West, Abel Smith House, Gunnels Wood Road, Stevenage, Hertfordshire SG1 2ST

Information Commissioner's Office Registration Number: ZA154308

Our Data Protection Officer is Lynette Dexter, Company Secretary

Email address for the Data Protection Officer: dp.foi@hfleducation.org

Please note that for the purpose of this trial, Kings College London are data controllers in relation to personal data of the children participating in this trial. Their use of data is separate from that of HFL Education. Please see the **Kings College London Privacy Policy** for more information about data sharing with them.

2. What Personal Data will we collect?

For the purpose of this Project HFL will collect the following personal data:

- Name of lead teacher and email address (to be shared with Kings College London via Consent Form).
- Name of participating teacher / member of staff and email address (HFL only).
- Name of HFL Adviser and email address (to be shared with school by HFL).
- Non-optional pupil demographical information; school name, FSM or non FSM.
- Optional pupil demographic information; gender, EAL, SEND/EHCP.

3. What do we do with the information we collect?

The purpose for which HFL is processing your personal data is:

- To enable effective communication with named project participants.
- To evaluate the impact of the programme on identified students.

4. Legal basis for processing Personal Data

The legal basis for collecting and using the personal information specified in this Privacy Notice for the purposes of legitimate interests (as per Article 6 (1) (f) of the UK GDPR) and we have considered that your interests and fundamental rights do not override those legitimate interests.

5. Who will have access to your Personal Data

Personal Data will be accessible by members of HFL Education staff involved in the delivery and administration of the Project. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

6. Is Personal Data being transferred internationally?

Your personal information will not be transferred outside of the European Economic Area (“EEA”) by HFL. References in this Notice to the EEA include the UK, even where the UK is no longer a member of the European Union / European Economic Area.

7. Where we store Personal Data and how we keep Personal Data secure

We are committed to ensuring that the data you provide is handled securely and have put in place suitable physical, electronic and managerial processes to safeguard your information.

Collected data will be securely stored on HFL’s OneDrive. Access to folders on the HFL OneDrive is limited to relevant HFL personnel. HFL has Cyber Essentials certification, which is reviewed and renewed annually, and all internal IT systems sit behind a Palo Alto firewall. BitLocker encryption is configured on all HFL laptops and multi-factor authentication is enabled on all HFL staff accounts.

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

8. Retention periods

We will only retain Personal Data processed by us for as long as is considered necessary for the purpose for which it was originally collected. The data will only be retained for as long as necessary to fulfil the purposes it was collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For this Project this is likely to be no more than two years. Once the retention period concludes Personal Data is securely and safely destroyed / deleted.

9. Your data rights

The General Data Protection Regulation and associated data protection law gives you rights in relation to Personal Data held about you. These are:

- **Right to be informed:** you have the right to be informed about the collection and use of your data. This Notice contains information in relation to the collection of your Personal Data, however, if we collect additional data for other purposes, we will inform you about this.
- **Right of Access:** if your Personal Data is held by us, you are entitled to access your Personal Data (unless an exception applies) by submitting a written request. For further details please refer to our Subject Access Request (SAR) procedure (Section 13).
- **Right of Rectification:** you have the right to require us to rectify any inaccurate Personal Data we hold about you. You also have the right to have incomplete Personal Data we hold about you completed. If you have any concerns about the accuracy of Personal Data that we hold then please contact us.
- **Right to Restriction:** you have the right to restrict the manner in which we can process Personal Data where:
 - the accuracy of the Personal Data is being contested by you;
 - the processing of your Personal Data is unlawful, but you do not want the relevant Personal Data to be erased; or
 - we no longer need to process your Personal Data for the agreed purposes, but you want to preserve your Personal Data for the establishment, exercise or defence of legal claims. Where any exercise by you of your right to restriction determines that our processing of particular Personal Data are to be restricted, we will then only process the relevant Personal Data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.
- **Right to Erasure:** you have the right to require we erase your Personal Data which we are processing where one of the following grounds applies:
 - the processing is no longer necessary in relation to the purposes for which your Personal Data were collected or otherwise processed;
 - our processing of your Personal Data is based on your consent, you have subsequently withdrawn that consent and there is no other legal ground we can use to process your Personal Data;
 - the Personal Data have been unlawfully processed; and
 - the erasure is required for compliance with a law to which we are subject.
- **Right to Data Portability:** you have the right to receive your Personal Data in a format that can be transferred. We will normally supply Personal Data in the form of e-mails or other mainstream software files. If you want to receive your Personal Data which you have provided to us in a structured, commonly used and machine-readable format, please contact us via the details in this Notice.
- **Right to object:** you have the right to object to the processing of your Personal Data where one of the following grounds apply:
 - the processing is based on legitimate interests or the performance of a task in the public interest;
 - the processing is for direct marketing; or
 - the processing is for the purposes of scientific/ historical research and statistics.

You can find out more about the way these rights work from the website of the Information Commissioner's Office (ICO).

10. Making a complaint

If you are unhappy with the way we have dealt with any of your data protection concerns, you can make a complaint to the Information Commissioners Office (ICO), the supervisory authority for data protection issues in England and Wales. We would recommend that you complain to us in the first instance, but if you wish to contact the ICO you can do so using the details below. The ICO is a wholly independent regulator established to enforce data protection law.

ICO Concerns website: www.ico.org.uk/concerns

ICO Helpline: 0303 123 1113

ICO Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11. Changes to this Privacy 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 providing you with an updated version of this Privacy Notice or by contacting you directly.

This Privacy Notice was last updated on 24th February 2025.