

Ministry of Education and Culture Privacy Notice to Data Subjects

Personal data to be processed in the follow-up and assessment of the two-year pre-primary education trial

1 General information

This Privacy Notice contains the information to be provided for the data subject (natural person) required under Articles 13 and 14 of the EU General Data Protection Regulation (EU) 679/2016. This notice, in its original form (28 September 2021), was given to the parents and other custodians of children participating in assessments before personal data were collected and it has been available on the website of the Ministry of Education and Culture. On 1 November 2021, the notice was made more specific with regard to data collected on the staff in early childhood education and care, pre-primary education and primary and lower secondary education. The updated version has been delivered to the staff in early childhood education and care, pre-primary and primary and lower secondary education, to up-to-date contact persons in municipalities and made available on the Ministry of Education and Culture's website.

2 Identity and contact details of the controller

Ministry of Education and Culture
Visiting address of the Registry: Ritarikatu 2 b, Helsinki
Postal address: PO Box 29, 00023 GOVERNMENT
Email address: kirjaamo@minedu.fi
Tel. +358 295 16001 (Government switchboard)

3 Contact details of the data protection officer

Data protection officer of the Ministry of Education and Culture
Email: okmtietosuojavastaava@minedu.fi
Postal address: Ministry of Education and Culture, PO Box 29, FI-00023
GOVERNMENT

4 Purposes for processing personal data

Personal data will be processed to carry out the follow-up and assessment referred to in section 10 of the Act on a Two-year Pre-primary Education trial (1046/2020).

The realisation of the two-year pre-primary education trial's objective will be examined in the follow-up study by monitoring and assessing the trial's implementation, target group, pedagogical and action-based practices of the trial, and the trial's core curriculum as well as local curricula. This will provide information and experiences on how successful the practical arrangements for the two-year pre-primary education were in the pilot municipalities and whether the children, families and educational staff were satisfied with it, for example.

The follow-up study compares the test group and the control group and examines the effects the two-year pre-primary education had on children in the test group. The results of the follow-up and assessment will produce research-based knowledge to support decision-making.

5 Basis for processing personal data

Under Article 6(1)(c) of the EU General Data Protection Regulation, the processing of personal data is based on the Ministry's statutory duties.

- Sections 3 and 10 of the Act on a Two-year Pre-primary Education Trial (1046/2020)
- Sections 11 and 18 of the Government Rules of Procedure (262/2003)
- Section 1 of the Government Decree on the Ministry of Education and Culture (310/2010)

6 Categories of data subjects to be processed, categories of personal data and sources of personal data (data content)

Children participating in the trial activities and the control group are evaluated using surveys based on both previous Finnish surveys and questions used in international contexts. The purpose is to survey children's linguistic and mathematical abilities, social skills, self-esteem and wellbeing. Information is collected by means of three surveys given to the trial group, one at the beginning of two-year pre-primary education, another one at the beginning of the second year of two-year pre-primary education and the third one at the beginning of comprehensive school. Similar surveys are simultaneously given to the control group, one in early childhood education and care, another one at the beginning of the one-year pre-primary education and the third one at the beginning of comprehensive school. In addition, separate follow-up surveys may be carried out for some children later during comprehensive school education.

Under the Act on a Two-year Pre-primary Education Trial, the trial register maintained by the Finnish National Agency for Education is used for carrying out the survey. The names of the children participating in the survey, their national learner ID and the information on the ECEC unit or school are extracted from the trial register. The Finnish National Agency for Education submits the information to the Centre for Learning Analytics at the University of Turku, which conducts the surveys electronically together with the staff of the ECEC unit or school. All information is handled in a secure environment, and only a limited group of people are allowed to access it, who are bound by the non-disclosure obligation.

The data collected in the survey will be supplemented with survey data collected from early childhood education and care, pre-primary, primary and lower secondary education staff, municipal officeholders and persons responsible for early childhood education and care as well as register-based data. Register-based information on each child is based on the register for the two-year pre-primary education trial maintained by the Finnish National Agency for Education and the database for early childhood education and care (Varda), the National Registry and Data Transfer Service for Study Rights and Completed Studies (Koski service), registers maintained by schools and register-based research materials maintained by Statistics Finland. The following

register-based background and monitoring information on the child may be included in the survey data:

- mother tongue, place and date of birth, gender, indicators describing places of residence (source: Statistics Finland)
- indicators for units and groups in early childhood education and care, pre-primary education, primary education and lower secondary education (sources: Varda and Koski data repositories and the register for the two-year pre-primary trial)
- grades, absences and disciplinary measures in comprehensive school (source: registers maintained by schools and Koski service).

In addition to register data, data collected through online surveys intended for local government officeholders responsible for early childhood education and care, teachers of early childhood education and care and parents and other custodians of children participating in the trial activities and belonging to the control group are also used to compile key indicators describing premises and places of residence. In addition, register-based research data maintained by Statistics Finland includes background information on the child's parents or other custodians and the staff members of early childhood education and care, pre-primary, primary and lower secondary education. These data are used for statistical analysis to create greater statistical impact and to target the analysis. The background information comprises: gender, mother tongue, place and time of birth, time when the person moved to Finland (if the person was born abroad), key indicators describing work and places of residence, income, occupation, education and training as well as the number of children in the family, their gender and dates of birth. Personal identity codes are processed when combining register data. The source of personal identity codes for the staff in early childhood education and care, pre-primary education and primary and lower secondary education derives from those representing their employer. The personal identity codes of parents are obtained from the Digital and Population Data Services Agency.

The survey data and register-based data are combined together by Statistics Finland. After the data have been combined, the individuals' names, national learner IDs, personal identity codes and any other direct identifiers are replaced with a 'pseudo identifier'. This makes it impossible to identify individual children based on direct identifiers. The data on direct identifiers are stored separately from other data sets, and they can only be accessed by those staff members of Statistics Finland whose work tasks include the processing of data of this type.

The research group analyses the pseudonymised research data in Statistics Finland's secure remote user interface, to which only researchers who have received a research permit for this project can log in. Individual persons, early childhood education and care units or schools cannot be identified from the published research results.

Following the completion of the follow-up study laid down in the Act on a Two-year Pre-primary Education Trial, the research data will be archived based on a screening decision made by the National Archives of Finland. It is estimated that the experiment will produce significant research material, even by international standards. It is possible that longitudinal studies on archived trial data might be carried out and the data might be combined with other survey and register data. Register-based monitoring data on the children may be collected throughout their life. The survey and register data could be used to study the schooling of the children who participated in the survey when they are in primary and lower secondary education as well as their educational and occupational choices after school, as well as their employment, income and family situation.

7 Processors and recipients of personal data

The personal data are processed by:

- Research group carrying out the follow-up and assessment study
- Statistics Finland
- Trial municipalities

It is possible that the archived data might be disclosed to other research projects at a later date.

8 Transferring personal data outside the EU or the EEA or to international organisations

The personal data will not be transferred outside the EU or the EEA or to any international organisations.

9 Personal data retention periods

A final report on the follow-up and assessment of the trial will be drawn up for the Government and Parliament in 2025. The follow-up and assessment material are stored until the final report is published.

Following the completion of the follow-up study laid down in the Act on a Two-year Pre-primary Education Trial, the research data will be archived based on a screening decision made by the National Archives of Finland. The National Archives of Finland will assess the content of the material to be archived, taking into account the needs of the studies and the obligations of data protection regulations. Archived data sets are protected as required by statutes.

10 Data subject rights

Data subjects and their parents and other custodians have the right to obtain information from the controller on whether or not personal data concerning them are being processed.

Data subjects also have the right to request from the controller:

- access to the personal data on themselves
- correction or erasure of personal data which are inaccurate or out of date
- restriction of the processing of personal data

If data subjects discover that their personal data have been processed unlawfully, they have the right to lodge a complaint with the Data Protection Ombudsman.

11 Automatic decision-making and profiling

The personal data will not be used for automated decision-making or profiling that would have an effect on the data subjects' rights or freedoms.

12 Protection of personal data

In its capacity as the controller, the Ministry of Education and Culture has taken the necessary technical and organisational measures to ensure that the data are secure and also requires this of the processors of personal data.