

17.2.2021

Ministry of Education and Culture's Privacy Notice for data subjects: personal data processed in a sample selected for a 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 will be stored on the website of the Ministry of Education and Culture.

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
E-mail address: kirjaamo@minedu.fi
Tel. +358 295 16001 (Switchboard)

3 Contact details of the data protection officer

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

4 Purposes and legal basis for processing personal data and categories of personal data to be processed

Purposes for processing personal data:

- Personal data will be processed to select a random sample for a two-year pre-primary education trial when the trial units in the participating municipalities and the children belonging to the trial group and control group have eventually been determined. The data will be processed as laid down in the Act on the Two-year Pre-primary Education Trial (1046/2020). The data to be processed will comprise register data.
- The data will be processed on behalf of the Ministry and in order to conduct the statutory trial. Consequently, the lawfulness of the processing is assessed on the basis of Article 6(1) of the General Data Processing Regulation.
- By processing personal data, the socio-economic operating environments of pre-primary education units can be standardised, and each child in the target group can be placed in either the trial group or the control group.
- Ensuring that the trial group and control group are commensurate is vital as this makes it possible to monitor the effectiveness of two-year pre-primary education. By selecting trial group and a control group whose background factors are as similar as possible, and thus minimising the 'background noise', the specific impacts of the trial activities on the trial group can be investigated.

- Accurate sampling makes it possible to select individuals for the trial based on precise criteria and to obtain results that can be generalised. The results will support policy-making and promote the realisation of rights to education.
- Providing the trial municipalities with identifiable unit-specific child group data and trial group and control group data formed from the data of the Finnish National Agency for Education and the Digital and Population Data Services Agency is part of the sampling work referred to in sections 4 and 5 of the Act on a Two-year Pre-primary Education Trial.

Legal basis for personal data processing:

- Government rules of procedure (262/2003)
- Government Decree on the Ministry of Education and Culture (310/2010)
- Act on a Two-year Pre-primary Education Trial (1046/2020, Government Proposal 149/2020)

Categories of personal data to be processed:

Children living in Mainland Finland who were born between 1 January 2014 and 31 December 2017 and their parents and other guardians living in the same dwelling.

Digital and Population Data Services Agency's data: Personal identity code, gender, mother tongue (exact ISO 639-1 language code), name, nationality, permanent address, address coordinates, address history, municipality of residence (municipality code and name), county, municipality of birth. For children born between 1 January 2014 and 31 December 2017, also data on the parents/guardians referred to above.

Tax Administration data: Tax data on the parents and other guardians of children living in Mainland Finland who were born between 1 January 2014 and 31 December 2017 living in the same dwelling.

Data produced by Statistics Finland: Educational level data on the parents and other guardians of children living in Mainland Finland who were born between 1 January 2014 and 31 December 2017 and those living in the same dwelling.

Finnish National Agency for Education's data: Data in Varda and Koski repositories on participation in early childhood education and care, pre-primary education and first grade of school from 2018–2020 (units which each child has attended).

Municipalities' data: Data corresponding to the Finnish National Agency for Education's data from municipalities which have not saved the data to the repositories.

Combination data: Based on the data cited above and other similar data, the operating environments of pre-primary education units can be taken into consideration, and the early childhood education and care unit which each child attends or close to which he or she lives will be determined.

Information to be sent to the trial municipalities:

Unit location information for early childhood education and care and pre-primary education (OID, name, address, and whether early childhood education and/or pre-primary education is organised in the unit)

Information on children born in 2016 or 2017 grouped based on units (name, personal identity code, address, whether the child is in the trial group or control group)

5 Processors and recipients of personal data

The personal data are processed by:

Designated researchers at Aalto University and VATT Institute for Economic Research

CSC – IT Center for Science Ltd

Trial municipalities

Finnish Tax Administration

Statistics Finland

6 Transfer of personal data to third countries or international organisations

Personal data are not transferred to third countries or international organisations.

7 Personal data retention periods

Under the Act on a Two-year Pre-primary Education Trial, the data sample will be retained until sampling has been completed for children born in 2017. It is estimated that this will take place by March 2022.

8 Data subject's rights

Data subjects and their parents and other guardians 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 concerning themselves
- correction or erasure of personal data which are inaccurate or out of date

If the data subject finds that the personal data concerning them has been processed unlawfully, they have the right to lodge a complaint with the Data Protection Ombudsman.

9 Source/s of personal data

The sources of personal data are:

- Digital and Population Data Services Agency
- Tax Administration
- Statistics Finland
- Finnish National Agency for Education
- Trial municipalities

10 Automated decision-making

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.

11 Securing the processing 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.