Information notice for Headmasters and School Evaluators taking part in the LET'S CARE Safe School Label pilot

Responsible LET'S CARE partner:

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Hi there, dear Headmaster, dear School Evaluator,

You are receiving this information because your school has been invited to take part in the pilot of the LET'S CARE Safe School Label, a self-evaluation tool that helps schools understand and improve their own environment.

LET'S CARE aims to comprehensively understand and improve the caring dimension of educational inclusion and school success.

With the information below, we want to make sure that you understand the purpose of the pilot, how information about you is used and what your rights are.

Please read all information carefully and do not hesitate to ask any question you might have to the national coordination team members.

Please note that your agreement to take part is not collected through this notice. It is recorded separately, in the participation form displayed in the LET'S CARE hub before the questionnaire is opened.

Information sheet

1. Do I have to participate? What happens if I say no, and can I change my mind?
2. What is the LET'S CARE project?
3. What is the Safe School Label pilot? What is its goal?
4. Is there a benefit for me in participating?
5. Is there a risk involved for me in participating?
6. What information will you collect about me?
7. Why do you need that information?
8. What will you do with that information? Who has access to my information?
9. How long will you keep that information?
10. Do I have rights? How can I exercise them?
11. What happens to my school's report?
12. What do I do if I have questions?

1. Do I have to participate? What happens if I say no, and can I change my mind?

No. Taking part in the pilot is voluntary, both for your school and for you. Your school decides whether to take part, and nothing will happen if it says no.

This means that you can:

- Decline to complete the questionnaire.
- Stop at any time before submitting the questionnaire. In that case none of your answers are stored.
- Ask for your school account and the answers already submitted to be deleted at any time while the pilot is running.

Your decision will not affect your employment, professional standing or relationship with your school in any way. Your school may also withdraw from the pilot at any time without consequence. If your school withdraws while the pilot is running, the school account and any answers already submitted are deleted on request. Otherwise, they are separated from the account at the end of the pilot, like all other answers, and kept as described in Section 9.

Note that you do not have to tell us why you do not want to participate or want to stop (but you can if you want).

2. What is the LET'S CARE project?

LET'S CARE is a European research project. The main goal of this project is to comprehensively understand and improve the caring dimension of educational inclusion and school success with a particular focus on how socio-emotional (in)security impacts educational opportunities and outcomes from early childhood through secondary education and beyond.

The project aims to identify what are the factors that affect student security and how these factors cause underachievement, disengagement, and school dropout, at four (4) different levels: individual, relational, community, and political. Moreover, it aims to explore strategies to create safer school environments for the benefit of students, teachers, and staff.

Based on the results of the research, LET'S CARE will create a theoretical model to foster Safe Learning, Safe Teaching, Safe School, and Safe Education at each of the above-mentioned levels, with the purpose to break the chain of transmission of educational and social exclusion.

3. What is the Safe School Label pilot? What is its goal?

The Safe School Label is a self-evaluation instrument developed in LET'S CARE to help each school understand and improve its own environment. It is formative. It is not used to hold schools to account, to rank them or to compare them. The questionnaire contains 110 statements about your school, such as its teaching and learning practices, rules, relationships, resources and structures, answered on rating scales or with yes or no. It has no free-text fields and asks for no personal information about you, your staff, students or families.

The national coordination team invites your school, and the Headmaster signs a commitment form designating a School Evaluator. Headmasters are trained at national level on how to use the tool and read the results. Fachhochschule Vorarlberg (FHV), the partner that develops the tool, creates an account for your school in the LET'S CARE hub, and the national coordination team sends the login credentials to the School Evaluator. When the questionnaire is submitted, the

answers are scored automatically and a private report is generated for your school. Every school that completes the self-evaluation receives a recognition of participation, which carries no level, grade or score. At the end, School Evaluators are invited to answer a short evaluation and feedback questionnaire. The goal of the pilot is to test the instrument in real school settings, in particular its usefulness, usability and novelty, and how it supports schools in their improvement process.

4. Is there a benefit for me in participating?

Your school receives a private report on its strengths and priorities for improvement, which it can use for its own reflection and planning, and a recognition of participation. If your school wishes, it can also ask the national coordination team for a support session to read and interpret the report. There are no other benefits involved.

The benefit for us in LET'S CARE is that we will learn how the Safe School Label can best support schools in becoming safer and more caring environments.

5. Is there a risk involved for me in participating?

We do not expect any significant risks from your participation in this pilot.

The questions concern your school, not you personally. The report may show areas of difficulty, but it is private to your school. It is not published, ranked or shared with education authorities, and the national coordination team does not see it unless your school chooses to share it. If your school downloads, prints or e-mails the report, that copy is under your school's own control (see Section 11).

The questionnaire must be completed in a single session, because answers are not saved until you submit them. Please plan enough time before you start, and keep your login credentials confidential. Moreover, you will be asked to change your password the first time you log in to your account. This ensures a higher protection for your personal data.

Your participation, non-participation or withdrawal from the pilot will not affect your employment, professional standing or relationship with your school in any way.

6. What information will you collect about me?

The following information will be collected and processed:

- From the commitment form signed by the Headmaster: The Headmaster's name and signature, the School Evaluator's name and institutional e-mail address, and the school contact e-mail address;
- Account data in the LET'S CARE hub: Username, school contact e-mail address, School Evaluator role and assigned school;
- The answers to the questionnaire, stored with the school account, the date and time of submission (the web address from which it was submitted), and the version of the questionnaire and scoring;
- A record of the School Evaluator's agreement to take part, with its date and time;
- Attendance at the national training and, if your school requests one, a record that a support session took place;

- The answers to the evaluation and feedback questionnaire. They do not include your name or e-mail address, but they do include your country, the language of completion, the education levels and size of your school, your role and whether you took part in earlier LET'S CARE activities
- Technical data recorded by the servers of the hub when it is used, such as IP addresses and the time of access, the page requested and the browser used.

Most of this information is provided by your school through the commitment form or by the School Evaluator when using the tool. If you were designated as School Evaluator by your Headmaster, your name and e-mail address come from that form. The pilot does not use any information about individual staff, students or families. Your contact details may also come from earlier LET'S CARE activities in which your school took part, such as the Community of Schools or the previous data collection. In that case they are reused only to invite your school to this pilot.

7. Why do you need that information?

We need this information to create your school's account and give the School Evaluator access to the Safe School Label, to score your school's answers and make the report available to your school, to issue the recognition of participation, to organise the training and any support session, and to evaluate the pilot and analyse its results in aggregate. Technical data are used to keep the hub secure and running.

Universidad Pontificia Comillas (COM) leads the pilot, Fachhochschule Vorarlberg (FHV) develops and operates the tool, Istituto Comprensivo di Bosco Chiesanuova (POLO) hosts the LET'S CARE hub, and respective fieldwork partner acts as the national coordination team in your country and answers requests about the information it collects. Each partner uses your information only for the pilot, keeps it secure and informs the others of any security incident. You can exercise your rights with any of the partners (see Section 10).

The involved partners process your information on the basis of their legitimate interest in carrying out and evaluating the pilot of the Safe School Label. We have assessed that this interest is not overridden by your interests or rights, because the information is limited, concerns you in your professional role and is protected by the safeguards described in this notice.

The School Evaluator's agreement to take part, recorded in the hub before the questionnaire is opened, is requested as a research ethics requirement. It is not the legal basis for the processing. Providing the account information is necessary to use the tool, while the evaluation and feedback questionnaire is voluntary.

8. What will you do with that information? Who has access to my information?

Your information is processed and analysed by authorised members of the LET'S CARE research team to help your school understand and improve its own environment by evaluating the pilot and the Safe School Label. Each partner uses your information only for the pilot and has the obligation to keep it secure.

Your school's report is available to your school only. It is not published, not used to rank or compare schools, and not shared with any education authority or other third party, including project partners that are education authorities. Within the project, only the holders of the hub's administrator accounts can access it, for technical and administrative purposes. The national coordination team does not have access to your school's results unless your school chooses to share its report for a support session.

Within the project, access is limited to what each partner needs for its tasks. The commitment form, including the School Evaluator's name and e-mail address, is collected by the national coordination team and passed to COM, which provides the details needed to create your school's account to FHV. FHV and the hub administrators, including staff of POLO (which hosts the hub), can access account and questionnaire data for technical and administrative purposes only. The national coordination team receives the login credentials only to pass them on to the School Evaluator, and deletes its copy afterwards. It also receives the list of schools in its country that completed the self-evaluation, without results, to send the evaluation and feedback questionnaire, and may receive the open answers to that questionnaire in its language, without any profile information, only to translate them. COM analyses the questionnaire answers only after they have been separated from the school account. The evaluation and feedback questionnaire is done through Microsoft Forms, within the institutional Microsoft 365 environment of COM. The form does not ask you to sign in and does not record your name or e-mail address. Microsoft processes the responses as a service provider (processor), under the standard data protection terms of Microsoft 365, which allow Microsoft to use the data only to provide the service and require it to protect them.

Research findings may be included in scientific publications, reports, presentations, conference papers, project deliverables and other dissemination materials. Results are presented only in aggregate, and results for any group of fewer than five schools are suppressed or merged, so that no school or person can be identified. Only aggregated data of this kind may be deposited in open access. The separated research dataset may be shared with other researchers only under restricted access and a written agreement prohibiting re-identification.

Your school's answers are scored automatically against fixed criteria. No person reviews or approves the result, and the score is not used to take any decision about you or your school.

All LET'S CARE partners are located in the European Union and your information is stored in the European Union. In limited cases, for example to secure its services, Microsoft may transfer some data to the United States. Such transfers are protected by the EU-US Data Privacy Framework and by the standard contractual clauses approved by the European Commission.

9. How long will you keep that information?

Your school account is kept until the end of the pilot, March 2027, and then closed. At that point the questionnaire answers are separated from the account and from your school. The separated research dataset, and the answers to the evaluation and feedback questionnaire, are kept until five (5) years after the end of the project, which ends in March 2027, so until March 2032, and are then deleted. The commitment form, the record of the agreement to take part, training and support records and the list of participating schools are also kept for five years after the end of the project. We will keep it for so long because we have a contractual obligation to do so. Technical data are kept for fourteen days and backups are taken every night and overwritten each time, so a deletion takes effect in the backups within twenty-four hours. While it is kept, the separated research dataset is stored apart from the commitment forms and participation records, only authorised researchers can access it, and no attempt is made to identify any school or person. Copies of open answers sent to the national coordination team for translation are deleted once the translation is delivered.

For as long as we use your information, we will respect the laws that tell us what we can and cannot do with it. We keep it in a secure manner and only give access to the people who strictly need it.

10. Do I have rights? How can I exercise them?

Yes, of course. You have the right to:

- Ask us for more information about the pilot;
- Ask us what information we have about you and obtain a copy;
- Ask us to correct information that is inaccurate;
- Ask us to delete your information, and in particular the school account and answers at any time while the pilot is running;
- Ask us to limit how your information is used, where applicable;
- Object at any time to the use of your information, on grounds relating to your particular situation;
- Lodge a complaint with a data protection authority, as explained below.

These rights continue to apply after the answers have been separated from the school account at the end of the pilot. Because the separated data no longer contain your account or your school, we may ask you for information that allows us to find the relevant record, and the same applies to the evaluation and feedback questionnaire, which is not linked to any account. We may refuse a request to delete research data where this would seriously impair the research, and we may refuse an objection where we can show compelling legitimate grounds for continuing.

If you want to exercise your rights or have questions, you can contact the national coordination team or Universidad Pontificia Comillas:

Universidad Pontificia Comillas: C/Alberto Aguilera, 23, 28015 Madrid +34915422800 email: letscare@comillas.edu

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- Mercedes Fernández García – mercedes@comillas.edu
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- **Bulgaria:** Iglika Angelova (angelovaiglika@gmail.com)
- **Lithuania:** Inga Zilinskiene (inga.zilinskiene@gmail.com) or Jurgita Vaitiekuniene (jurgita.vaitiekuniene@prsc.lt)
- **Italy:** POLO (poloeuropa@gmail.com)

If you are not happy with our answer, you can submit a complaint to the data protection authority of the country where you live or work (in Italy, the Garante per la protezione dei dati personali, https://www.garanteprivacy.it; in Portugal, the Comissão Nacional de Proteção de Dados – CNPD, https://www.cnpd.pt; in Lithuania, the State Data Protection Inspectorate, https://vdai.lrv.lt; in Poland, the Personal Data Protection Office – Urząd Ochrony Danych Osobowych, UODO, https://uodo.gov.pl; and in Bulgaria, the Commission for Personal Data Protection,

https://www.cpdp.bg), or to the Spanish Data Protection Agency (https://www.aepd.es/en). Nevertheless, we will always try to avoid that you need to do this, by answering your questions and helping you out whenever we can.

11. What happens to my school's report?

The report is generated on request and can be viewed in your school's profile in the hub, downloaded as a PDF or sent by e-mail to the school contact address given in the commitment form. It is intended for your school's internal reflection and planning.

If your school downloads, prints or circulates the report, that copy is under your school's control and responsibility. If your school asks the national coordination team for a support session, it shares the report voluntarily and keeps custody of it. The facilitator does not keep the report, the support template or any record of your school's scores, and only records that the session took place.

No one in the LET'S CARE project reviews your school's results or takes any decision about your school on the basis of the report. Because the questionnaire concerns the school as a whole and asks for no information about individual staff, students or families, the pilot is not expected to reveal information about any individual. In the open questions of the evaluation and feedback questionnaire, please do not mention the names of any persons or of your school.

12. What do I do if I have questions?

If you have any questions or suggestions, you can ask the national coordination team or contact us at:

- **Spain:** JEX – Miguel Méndez Pérez (miguel.mendez@gpex.es)
- **Portugal:** UCP – Pedro Dias (pmbdias@ucp.pt)
- **Poland:** ARID – Maciej Dymacz (lacjum@lacjum.org)
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