

## **SCIENTIFIC RESEARCH PRIVACY POLICY/NOTICE**

(EU 2016/679) ARTICLES 13, 14 and 30

For survey participants in comprehensive  
and upper secondary school

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### ***FOR RESEARCH PARTICIPANTS***

This document contains information about the survey, and the processing of personal data in the survey, that is part of the research project IMPROVISATION AS TRANSFORMATIONAL MOMENTUM FOR SAFETY AND EQUITY IN SCHOOL COMMUNITY. This project stems from concerns over the increasing malaise in school communities and the realization of educational equity. The three-year (2023-2026) research and development project will explore how improvisation practices in music education can be transformative in efforts to build an environment of safety and equality in school communities. The project aims to promote social safety and well-being in the school community, and to enable each learner to exercise their individual and equal rights to well-being and musical competence.

This document concerns the survey, which will be carried out three times in the academic year 2023-2024. The answers to the questionnaire will be used as data to investigate the social learning environment and experienced safety in both the school community and more particularly in music education. The data generated by the questionnaire responses will be used to describe students' perspectives on the social environment of the school community over the course of one academic year. The questionnaire responses are intended to provide an overall picture and not to focus on individuals. The questionnaire does not ask for direct personal data, but it is possible that the open-ended responses provided by respondents may contain identifiable information.

This document provides information about the survey and the processing of personal data: how the personal data will be collected, managed, and used. The rights of the data subject are explained in more detail at the end of this document. Participation in the survey and the provision of personal data is voluntary. Respondents may withdraw from the survey at any time without giving any reason, and will not be penalized if they subsequently withdraw from the survey. The data collected in the survey up to that point may be used for the purposes of the survey as indicated in this document. There will be no remuneration for participation in the research.

The research is funded by the Kone Foundation and carried out by Eeva Siljamäki, the researcher in charge of the project, together with a research team consisting of researchers from the University of Jyväskylä and a lecturer from the University of the Arts Helsinki (as an independent researcher in the project).

### **1. DATA CONTROLLER(S)**

The controller is responsible for the lawfulness of the processing of personal data in the survey.

The controller of this survey is: University of Jyväskylä, Seminaarinkatu 15, PL 35, 40014 University of Jyväskylä. Business ID 0245894-7. University of Jyväskylä Data Protection Officer: tietosuoja@jyu.fi, +358 40 805 3297.

## Survey - GDPR

If you have any questions about the rights of data subjects, please contact the University's Data Protection Officer. All requests concerning the exercise of rights should be sent to the University of Jyväskylä Registrar's Office. Registrar's Office and Archives, P.O. Box 35 (C), 40014 University of Jyväskylä, tel. 040 805 3472, e-mail: [kirjaamo@ju.fi](mailto:kirjaamo@ju.fi). Visiting address: Seminaarinkatu 15 C-building (University main building, 1st floor), room C 140.

### 2. CONTACT PERSON AND RESEARCHER IN CHARGE

Eeva Siljamäki, Postdoctoral researcher, Faculty of Humanities and Social Sciences, Department of Music, Art, and Culture Studies, University of Jyväskylä

Email: [eeva.k.siljamaki@ju.fi](mailto:eeva.k.siljamaki@ju.fi)

Phone number: +358 50 3424 644

### 3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The University of Jyväskylä's Data Protection Officer can be contacted at the following e-mail address: [tietosuoja@ju.fi](mailto:tietosuoja@ju.fi) , tel. +358 40 805 3297.

### 4. DESCRIPTION OF THE RESEARCH PROJECT

This survey is part of a wider research project aiming to develop learning environments for music education. The project aims to support the building of social safety and the holistic growth of learners in music education, and to enable every learner's right to musical development.

The project will provide tools for the school community to introduce new artistic practices, expand and liberate artistic expression, foster artistic polyphony, and move from the role of experiencer to that of creator. The results of the project will help to develop the social learning environment of music education and the school community, as well as safer and more equitable music education in the wider Finnish education system.

There will be no remuneration and no specific benefit to your child for their participation in this research. The results of the study will be used in teaching and research and applied to develop practical approaches in music education and school communities more widely in Finnish education. The research will result in scientific publications, through which new knowledge will be disseminated over the next 10 years. Presentations and teaching on the subject will also be given. The project is funded by the Kone Foundation and will end in February 2026.

### 5. THE COLLECTION OF AND PURPOSE OF PROCESSING PERSONAL DATA

A total of approximately 230 primary and secondary school students will be asked to participate in the survey during the academic year 2023-2024.

The survey will take approximately 10 minutes and will be completed during the school day, a total of three (3) times during the school year. The questionnaire will be completed on a smart phone, tablet, or computer using Webropol. The survey does not ask for direct personal information, but it is possible that the open-ended responses provided by respondents may contain personally identifiable information. Respondents are instructed in the introduction to the questionnaire that responses should not contain personal data or sensitive information. In research publications, research-based educational materials, and teaching, direct contributions or responses from respondents may be quoted in the data, in part or in full, with any information that could lead to the identification of the respondent being removed.

The data generated by the survey responses are intended to capture students' perspectives on the social environment of the school community over the course of one academic year. The questionnaire responses will be analyzed both quantitatively and qualitatively. Quantitatively, the points of emphasis that emerge at the level of the whole group of respondents will be examined. The open-ended responses will be analyzed qualitatively. In research publications, research-based educational materials, and teaching, some or all of the answers to the questionnaire may be quoted, but any information that could lead to the identification of the respondent will be removed.

### **6. PROCESSORS OF PERSONAL DATA**

- Members of the research team
- The electronic service Wilma, which is used to inform parents about the survey
- Webropol service to carry out the survey
- University of Jyväskylä's secure Nextcloud/CsC service and Microsoft 365 O service, where the data will be processed during the active research process
- SPSS software and Atlas.ti service used for data analysis

### **7. PERSONAL DATA PROCESSED IN THE SURVEY**

From the outset, personal data will be collected only to the extent necessary for the purposes of conducting the research.

No special categories of personal data will be processed in the survey. Personal data will not be used for marketing or direct marketing purposes. The processing does not involve profiling or automated decision-making. The purpose of the processing of personal data in this study is not to assess personal characteristics, but to assess personal data and characteristics in the context of broader scientific research.

The survey does not ask for direct personal data, but it is possible that the open-ended responses provided by respondents may contain identifiable information. To compare the survey results with previous studies, respondents will be asked to answer a background question on gender. This information will be used in general terms and will not be linked to individual responses.

The survey will be conducted as an anonymous online survey on Webropol. The minor's guardian(s) will be informed of the survey through the electronic service Wilma. The music teacher will see the name of the participant and their guardian(s). The music teacher who carries out the information in the comprehensive school is also part of the research team. No personal data of the subjects or their guardians will be shared with the rest of the research team, nor will names be collected in separate files. At the time of the information session, the guardians will be given the opportunity to refuse their student's participation in the study by contacting the researcher in charge: [eeva.k.siljamaki@jyu.fi](mailto:eeva.k.siljamaki@jyu.fi)

This privacy notice has been published on the study website, and a direct link to this information has been provided to the respondent via an electronic questionnaire.

### **8. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA IN RESEARCH/ARCHIVING (ARCHIVES ACT 831/1994)**

The data processing is necessary for scientific, artistic, or historical research purposes, or for statistical purposes, and it is proportionate with consideration to the aim of the public interest pursued (section 4 (3) in the Data Protection Act (1050/2018)).

## **9. TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA AREA**

In the research, your data will not be transferred outside the EU/EEA area.

## **10. PROTECTION OF PERSONAL DATA AND DE-IDENTIFICATION**

Personal data obtained and processed in the research will be protected.

The textual data will be processed on the researcher's computer in a secure service, protected by a personal password and user ID during the active analysis process.

Manual data (e.g. in paper or other tangible form) will be protected in the following ways: the data will be stored in a locked (physical) space and access will be monitored.

Identification data in the survey will be processed as follows:

- Personal data will be collected without direct identification data.
- Direct identifiers will be deleted when the data are generated.

The members of the research group have completed data protection training, where they have learned about the processing of personal data. An ethical review of the research has been carried out. A separate Data Processing Impact Assessment (DPIA) has been carried out for the study, and the Data Protection Officer has been consulted on the DPIA.

The research team is committed to complying with the applicable legislation and the data security and data protection principles in force at the time. Subjects will be informed of any future changes to the privacy notice and of any change in the software used or change of storage or processing location. The data subject will be informed separately of any future changes to the privacy notice if the change is significant from the data subject's point of view. The information will be provided via the project website, e-mail, and/or the electronic service Wilma.

## **11. ANONYMISATION**

Direct identifiers are not asked for, or are removed as a safeguard at the time of compiling the material. Individual survey responses will not be combined using indirect and direct identifiers for identification purposes. No special categories of personal data will be processed in the survey. Indirect identification may be possible on the basis of information known about the respondent (school, grade, municipality) and the data collected (gender).

## **12. PROCESSING OF PERSONAL DATA AFTER THE RESEARCH HAS BEEN COMPLETED**

The pseudonymized textual data will be stored for further research until 01/2033. Data on school, grade level, and municipality will be stored separately from the survey data and destroyed by 01/2033 at the latest. A new privacy notice will be sent to the data subjects on the new use of the survey data, unless the controller is no longer able to identify the data subjects from the survey data. In addition, no notification of the new research may be sent to the data subject if the provision of the data would be impossible, or would involve a disproportionate effort, or would prevent or seriously impair the achievement of the purposes of the research (Article 14(5)(b) of the GDPR).

For more information on archiving, contact the researcher in charge: [eeva.k.siljamaki@jyu.fi](mailto:eeva.k.siljamaki@jyu.fi)

### **13. RIGHTS OF THE DATA SUBJECT**

The contact person for matters relating to the rights of the data subject is the person mentioned in section 1 of this notice.

#### **Rights of the data subject**

According to the GDPR, the data subject has the right to:

- have access to the data
- rectify the data
- ensure data erasure, and the right to be forgotten
- restrict the processing of data
- the transfer of data from one system to another
- object to the processing of data
- not be subject to automated decision-making

However, not all rights can be exercised by the data subject in all situations. For example, the grounds on which personal data are processed may affect the situation.

More information on the rights of data subjects in different situations can be found on the Office of the Data Protection Ombudsman website: <https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>

#### **Application of rights**

For the purposes of this survey, the processing of personal data does not require the identification of the data subject and the controller is not able to identify the data subject. Thereby, the rights of access, rectification, erasure, restriction of processing, notification, and portability do not apply unless the data subject provides additional information that allows identification (Article 11 of the GDPR).

#### **Derogation from rights**

The Data Protection Regulation and the Finnish Data Protection Act provide for derogation from certain rights of the data subject where personal data are processed for scientific research purposes and the exercise of the rights would prevent or seriously impair the achievement of the purposes of the processing. The need to derogate from the data subject's rights is always assessed on a case-by-case basis.

#### **Right of appeal**

You have the right to lodge a complaint with the Office of the Data Protection Ombudsman if you consider that the processing of your personal data infringes the applicable data protection legislation.

Contact information:

Office of the Data Protection Ombudsman  
Visiting address: Lintulahdenkuja 4, 00530 Helsinki

## Survey - GDPR

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