

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

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

For students of the researched teaching group  
in comprehensive and upper secondary school

Drafting date: 4.9.2023

English translation date: 16.11.2023

### **FOR RESEARCH PARTICIPANTS**

This document contains information about the study and processing of personal data as part of the research project IMPROVISATION AS TRANSFORMATIONAL MOMENTUM FOR SAFETY AND EQUITY IN THE 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 collection of data during the academic year 2023-2024 associated with the activities of the music teaching group in upper secondary and comprehensive schools. The study will be based on observations, interviews, and video and audio recordings of the activities that take place during the music teaching. The data will be used to explore the development of the music teacher's own work, the music teaching process, and the social learning environment. The data will be used to investigate how improvisation practices can support the building of a safer and more equal school community.

This document provides information about the study and processing of personal data: how the personal data will be collected, managed, and used in the study. The rights of the data subjects are set out in more detail at the end of this document. Participation in the study and the provision of personal data is voluntary. Participants have the right to withdraw at any time, without explanation and without consequences. Withdrawal and refusal to participate can be reported to the researcher at: [eeva.k.siljamaki@jyu.fi](mailto:eeva.k.siljamaki@jyu.fi). Data collected up to the point of withdrawal may be used for research purposes, 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](mailto:tietosuoja@jyu.fi), +358 40 805 3297.

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@jyu.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@jyu.fi](mailto:eeva.k.siljamaki@jyu.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@jyu.fi](mailto:tietosuoja@jyu.fi), tel. +358 40 805 3297.

## **4. DESCRIPTION OF THE RESEARCH PROJECT**

The data collected in this study enables us to examine music teaching from the learner's perspective and, consequently, to promote the development of a music learning environment. This study is part of a wider research project to develop the social learning environment in music education. The project aims to support the building of social security and the holistic growth of learners in music education, and to enable each 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 allow students to move from the role of experienter 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 is potential discomfort for the respondent in the time needed to participate in the interviews. The presence of the researcher and the video recording during the music lessons of the study group may initially cause discomfort, until the participants get used to the researcher and the video recording as part of the music lessons. In the classroom situation, creative methods are developed to support a sense of community and safety. Learning new creative techniques may involve experiencing momentary feelings of discomfort that, based on general life experience, do not pose a particular risk to the subject or guardian. The aim of the study is to build a sense of community and safety, which will be monitored by collecting immediate feedback from pupils and by unpacking and addressing perceived experiences of discomfort.

The project will produce research articles in Finnish and English, as well as seminar and conference presentations, over the next 10 years. The results of the research project will be used in teaching and research and applied to the development of practical approaches in music education and wider school communities. The results of the research project can be used in the academic business activities of the members of the research team.

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

One music teaching group from comprehensive school (students under 15 years old) and one music teaching group from upper secondary school (students over 15 years old) will be invited to participate in the study. The research data containing personal data will be collected during the academic year 2023-2024 in the context of music lessons and related activities, in a way that does not interfere with normal teaching activities.

Personal data will only be collected to the extent necessary to carry out the research. Personal data will be collected through the following methods: interviews, photographing, videotaping, recording, researcher and teacher observation notes, teacher's diary of the development work, and researcher's research diary.

The audio and visual material will be used to support the teacher's development work, and to explore interactions and pedagogical practices in music-making. During data collection, care will be taken to ensure that only consenting participants appear in the visual and audio material. Visual or audio material may be used as a stimulus for interviews if the interviewee has been involved in the music teaching. In the researcher's and teacher's notes and diaries, respectful language is used for all subjects and direct identifiers are avoided.

The interviews aim to capture students' views and experiences of improvisation/music making and the social environment in music education. The duration of the group or individual interviews is approximately 1 hour and take place at a time convenient to the volunteer participants, in a music classroom or other nearby space. During the interview, extracts from the research material (video, photo, or audio recordings of music lessons in which the volunteer has participated) may be viewed. In this case, the extract from the research material (photo or audio recording) will serve as a stimulus for discussion. Respondents will be instructed during the interview that the answers should not contain personal or sensitive information. Interviews will be conducted 1-3 times during the academic year. All interviews will be audio-recorded and converted into a text file as soon as possible after the interview, after which the audio-recording will be destroyed. Group interviews may be videotaped, and the videotape may be used to identify the speaker when converting the audio recording into a text file. The video recording will be destroyed as soon as possible after the identification of the speakers, but no later than 9/2024.

Direct quotations or responses from respondents in the data, in whole or in part, may be used in research publications, research-based educational materials, and teaching, but any information that could lead to the identification of the respondent will be removed. The presentation of research results may also use still images of the subjects taken in the context of music lessons, which will be pseudonymized. The images will be processed in such a way that individual identification is unlikely; the images will be processed using Microsoft Word artistic effects, cropping, color changing or scaling, and adjusting brightness, contrast, and sharpness to make it unlikely that an individual can be identified. Altered images with modified identification data (pseudonymization) are kept separately from the originals. The original unedited images will be destroyed after analysis of the active data, no later than 12/2025.

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

- Members of the research team.
- The electronic service Wilma, which is used to inform parents about the survey.
- The 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 RESEARCH**

From the outset, personal data will be collected only to the extent necessary for the purposes of conducting the research. Your personal data will be processed for research purpose as described in this document.

The following personal data may be collected from subjects: name, contact details, name and contact details of guardian(s), school, class, city, gender, audio and video recordings of music lessons and interviews, researcher and music teacher notes, observations and diary entries of music lessons and related activities.

Informing the minor's guardian(s) of participation in the study will be done primarily through the electronic service Wilma, where the music teacher will see the name and contact information of the subject and his/her guardian(s). The music teacher, who has access to the subject's personal data in the course of his/her employment, will not share personal data (e.g. name, e-mail, telephone number) of the subject or his/her guardian(s) with the research team until the consent to share contact information has been obtained from the guardian(s). The guardian(s) may also be informed by telephone, email, or in person about matters related to consent and the study.

In the case of minors under 15 years of age, the subjects and their guardians will be asked for their consent to participate in the study.

In the case of minors over 15 years of age, the right to autonomy is respected and consent is sought only from the subject. A guardian of a minor over 15 years of age has the possibility to prohibit the collection of direct personal data (photo, voice, interview) or to prohibit the student from participating in the study by contacting the researcher in charge: [eeva.k.siljamaki@jyu.fi](mailto:eeva.k.siljamaki@jyu.fi)

The contact details of a subject under 15 years of age and their guardian, which are necessary for the conduct of the survey, will be kept separately from the survey data. Contact details (name, telephone number, and/or e-mail) of a minor subject over 15 years of age may be collected from the subject themselves. This contact information will be used to arrange interviews. The contact details will only be used to contact the minor subject and/or the guardian(s) of the minor subject under 15 years of age during the data collection period, i.e. the school year 2023-2024. No special categories of personal data will be processed in the study. The contact data will be used to create a personal data register managed by the researcher in charge, which will record the name and possibly the telephone number and/or email of the subjects, and the name, telephone number, and/or email of the guardian(s) of the subject under 15 years of age.

Personal data will not be used for marketing. The processing of data does not involve profiling or automated decision-making. The purpose of processing personal data for research purposes is not to assess personal characteristics, but to assess personal data and characteristics in the context of broader scientific research.

This privacy notice has been published on the research website and a direct link to this information has been provided to the respondent with the research information sheet in a Wilma message or as a hard copy delivered at home.

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

The 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**

The personal data contained in the research data is processed and stored in a secure manner, so that only those who need to access it have access to it. The data will contain direct and indirect identifiers. Image and

audio files containing direct identifiers will be transferred from the memory card to a secure service and copied to an external hard drive immediately, or as soon as possible, after data collection, after which the memory cards will be erased. Memory cards, external hard disks, and manual data (e.g. in paper or other tangible forms) are protected in the following ways. Data processed in information systems are protected by the following means: username and password.

Audio and video recordings are processed on the responsible researcher's computer, which is protected by the following means: username and password. Processing (listening, viewing) takes place in a physical space where there are no persons outside the study.

Image and audio files are converted into text format, in which case direct identification data are removed or modified as a protective measure (pseudonymized data, in which case identification can be restored by means of a code or similar information so that new data can be associated with the data).

During the active analysis process, the textual data is processed on a secure service and on the researcher's computer, protected by a personal password. The data processed in the information systems will be protected by the following means: username and password

Indirect identification may be possible on the basis of the data collected from the subject. The contact information (name, telephone number, and/or e-mail address) of the subject and the guardian(s) of the subject under 15 years of age, necessary for the conduct of the research, will be kept separately from the research data and be protected by a password or lock.

Members of the research team have undergone training on data protection in the processing of personal data. An ethical review of the research project 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 the location of storage or processing. 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. PROCESSING OF PERSONAL DATA AFTER THE RESEARCH HAS BEEN COMPLETED**

The duration of the data processing:

- After active analysis of the material, the video recordings of music lessons will be destroyed by 12/2025 at the latest.
- Audio recordings of interviews and memory cards will be destroyed by 09/2024 at the latest.
- Audio recordings of music lessons, excluding extracted collective pieces, will be destroyed by 09/2024 at the latest.
- The musical events in the audio recordings of music lessons, i.e. the collective pieces, will be extracted and stored for further research until 01/2033, after which they will be destroyed.
- The pseudonymised textual material will be stored for further research on a password-protected external hard disk, which will be kept in a locked cabinet until 01/2033, after which it will be destroyed.
- Data on school, grade level, and municipality will be stored separately from the research data and destroyed by 01/2033 at the latest.

The research team may continue to use the stored pseudonymized textual material and collective pieces under the supervision of the researcher in charge. In reporting the research, collective pieces may be used where it is highly unlikely that individuals can be identified.

The guardian(s) or a subject over 15 years of age can choose on the consent form whether the contact information (name, email, phone number) collected for the purpose of the study will be destroyed at the end of the active data collection (6/2024) or at the end of the time reserved for the follow-up study, which is no later than 1/2033. The latter option will allow the submission of a privacy notice for the follow-up study.

A new privacy notice will be sent to the data subjects on any new use of the research data, unless the controller is no longer able to identify the data subjects from the research data. In addition, a notification of any new research may not 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)

## 12. 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  
Postal address: P.O. Box 800, 00531 Helsinki, Finland  
E-mail: tietosuoja(at)om.fi  
Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768