

# Efficacy Trial of the Rehearsal Room Writing Programme

## Privacy Notice for Parents and Carers

### 1 Why are we collecting this data?

The National Foundation for Educational Research (NFER), in collaboration with the University of Exeter, is processing personal data to evaluate the Royal Shakespeare Company's (RSC) Rehearsal Room Writing (RRW) programme using a randomised controlled trial (RCT). The Education Endowment Foundation (EEF) has commissioned the NFER to carry out an independent evaluation of the RRW programme. The funding for this project and evaluation is from the Department for Education (DfE)'s Accelerator Fund, which aims to expand the use of evidence-based programmes. The RSC will oversee the delivery of the intervention. The evaluation will take place between February 2025 and May 2028.

NFER is the data controller for the evaluation and will make decisions about how and what personal data is used for the evaluation. The University of Exeter is a data processor for the evaluation. No More Marking will also be a data processor for the evaluation; their platform will be used to mark the writing task.

RSC will process personal data to deliver the RRW programme. They are the data controller for the delivery of the RRW programme (making decisions about what data is required and how it is processed for intervention delivery).

This privacy notice covers pupil data collected for the purpose of the evaluation. School staff data collected for the evaluation is covered by a separate [privacy notice for school staff](#). Data collected by the RSC for the purpose of programme delivery is covered in the [RSC's privacy notice](#).

All data will be treated with the strictest confidence – your child's data, their teachers or their school will not be identified in any report arising from the research.

### 2 What is the legal basis for processing activities?

The legal basis for processing personal data is covered by:

- Article 6 (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

A legitimate interest assessment has been undertaken. It demonstrates that it is within NFER's interests in undertaking this evaluation to collect and analyse data on the effectiveness of implementation and outcomes. The evaluation fulfils one of NFER's core business purposes (undertaking research, evaluation, and information activities). It has broader societal benefits and will contribute to improving the lives of learners by providing evidence about impact on pupils' writing ability, enjoyment of writing, their belief in their writing ability, as well as the teachers' perception of their ability to teach writing. The research cannot be done without processing personal data, but processing does not override the data subject's interests.

### 3 How will personal data be obtained?

NFER will collect details of participating pupils from their school. NFER will use these pupil details to obtain background characteristics (see section 4 for full details) from the DfE's National Pupil Database (NPD). Any personal pupil data provided directly by a school will be shared via NFER's secure online portal.

Pupils will complete paper-based surveys and writing assessments before and after the programme is delivered. These will be administered by either their class teacher or one of NFER's test administrators and returned to the NFER via secure courier.

Pupil focus groups will be conducted in a small number of schools by NFER researchers to gather pupils' views and perceptions of the RRW programme.

### 4 What personal data is being collected by this project?

If your child is participating in the trial, the following types of information about them will be collected:

- Name, date of birth, FSM status and unique pupil number (UPN)
- Views on their enjoyment of writing, writing self-efficacy and speaking confidence
- Responses to two writing tasks prompts

When matching the trial pupils' data to NPD, the following types of information about your child will be collected:

- Free school meal eligibility (FSM) status
- Key Stage 2 assessment scores for writing, reading and mathematics

Your child may be asked to participate in an in-person focus group with an NFER researcher. In this case, further information will be provided to you, and your child will only participate with your agreement.

NFER researchers will observe programme delivery at a small number of schools. Your child may be observed as part of this activity, but no additional personal data will be collected.

### 5 Who will personal data be shared with?

Schools and NFER will share pupil data with each other.

Pupils' writing responses will be scanned into the No More Marking (NMM) platform to use Comparative Judgement to mark the writing task. Only pseudonymised<sup>1</sup> data will be shared with NMM and NMM will not be able to be able to link writing assessments to individual children. NMM's privacy notice can be found [here](#).

Some pseudonymised writing task responses will be shared with the University of Exeter.

Microsoft's Copilot will be used to aid transcription of a sample of pseudonymised pupil writing assessments. All transcripts will also be reviewed by a researcher. The data will

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<sup>1</sup> Pseudonymisation is a technique that replaces or removes information that identifies an individual (like names or other meaningful identifiers) in a data set.

remain within NFER's private digital network. This means that it will not leave NFER's Microsoft tenancy or be used to further train the software.

NFER will share writing assessment scores with schools at the end of the trial. If any safeguarding concerns arise from pupils' written responses NFER will share these with schools.

Pupils' full name, date of birth and UPN will be shared with the DfE's NPD team to request background data such as FSM eligibility where required for the analysis.

Three months after the publication of the evaluation report, pseudonymised matched pupil outcome data will be added to the EEF archive, which is managed by the Fischer Family Trust on behalf of the EEF and hosted by the Office of National Statistics (ONS). This will enable the EEF and other research teams to use the pseudonymised data as part of subsequent research through the ONS Approved Researcher Scheme. At this point, the EEF becomes the data controller and is responsible for taking decisions about the means and purposes of data processing. Further information about the EEF archive is available [here](#). See the [EEF's privacy notice](#) for more information on how the EEF processes and uses your data.

Pupil focus group data and notes from the lesson observations will not be shared outside the NFER research team.

## 6 Is personal data being transferred out of the UK?

NFER only stores personal data in the UK. While Microsoft Copilot primarily retains data in the UK (where our tenancy is located) some processing may take place in third countries. Any such transfer is safeguarded by appropriate safeguards, for example, an adequacy decision or contractual obligation to protect your information to the standard required in the UK.

## 7 How long will personal data be retained?

Any personal data collected for evaluation purposes will be deleted by NFER and data processors within one year of publication of the final longitudinal report, which is scheduled for May 2028. At the latest, all personal data will be deleted by May 2029.

## 8 What are my rights with respect to personal data?

NFER handles personal data in accordance with the rights given to individuals under data protection legislation. Under certain circumstances data subjects have the right:

- to request access to information that is held about them (a data subject access request)
- to have personal data rectified if it is inaccurate or incomplete.
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- to restrict processing of personal data (for example, permitting its storage but no further processing).
- to object to processing
- to data portability
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This helps us ensure that personal information is not disclosed to any person who has no right to receive it.

To exercise any of these rights, please contact the NFER's Compliance Officer at [compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk).

Although we value your child's participation in this evaluation and contribution to important findings, you can withdraw your child from the evaluation activities at any time. If you withdraw, unless otherwise instructed, we will use any data we have collected up to that point. Please note that withdrawing your child's data will not be possible once data analysis has commenced (from September 2026). Withdrawing your child from the trial will not impact on your child's participation in the RRW programme. If at any time you wish to withdraw your child from the evaluation activities, or withdraw your child's data or correct errors in it, please contact: [RRW-trial@nfer.ac.uk](mailto:RRW-trial@nfer.ac.uk)

## 9 Who can I contact about this project?

NFER is responsible for the day-to-day management of the evaluation. Please contact the evaluation team at: [RRW-trial@nfer.ac.uk](mailto:RRW-trial@nfer.ac.uk)

If you have any questions about the way NFER processes personal data, please contact the Compliance Officer using the email address provided above, or you can make a complaint as outlined in our [Complaints Policy](#).

After we have responded, if you remain dissatisfied, you have the right to raise a complaint about data protection issues with the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at <https://ico.org.uk/concerns/>

Further information on this project, including information sheets and privacy notices can be found [here](#).

## 10 Updates

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. The date when this privacy notice was last updated is shown in the footer at the bottom of this document.

**June 2026: Updated to reflect the planned use of Microsoft's Copilot in transcription and how to make a data protection complaint.**

**July 2026: This change updates the process for managing data protection complaints to comply with the 2025 Data (Use and Access) Act.**