

# Parent and carers privacy notice for the effectiveness trial of Mathematical Reasoning in Year 2

## 1 Why are we collecting this data?

The Education Endowment Foundation (EEF) has commissioned the National Foundation for Educational Research (NFER) to carry out an evaluation of the Mathematical Reasoning programme, developed and delivered by the University of Oxford. The purpose of this evaluation is to understand whether the Mathematical Reasoning programme will help to improve pupils' mathematical attainment. More information about what the programme and evaluation will involve can be found [here](#).

The trial will take place over the course of the 2024-25 academic year. Teachers will deliver the Mathematical Reasoning sessions once a week to pupils in Year 2 between November 2024 and April 2025.

This document outlines how pupils' personal data will be collected and processed for the purposes of this evaluation. Your child's data will be treated with the strictest confidence and processed in accordance with the GDPR and the Data Protection Act 2018. We will not use your child's name in any report arising from the research.

NFER is the data controller for the evaluation and will make decisions about what personal data is used and how in accordance with the objectives of the study set by the EEF. University of Oxford is the data processor for the evaluation. This means that they will process some of the data collected in order to support the evaluation, but their access is restricted to anonymous data collected from the children.

The University of Oxford is the data controller for the programme delivery and has produced a separate privacy notice to cover how personal data is processed for it. This is available on our [project webpage](#). They will also collect data from the teachers and their mentors about the programme implementation, but not about individual children for their own research purposes.

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

The legal basis for processing personal data is covered by GDPR Article 6 (1) (f):

*Legitimate interests: the processing is necessary for your (or a third party's) legitimate interests 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. 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 the impact of teaching techniques used in the classroom. Research cannot be done without processing personal data, but NFER will ensure your child's rights are respected at all times.

The legal basis for processing pupils' special personal data is covered by GDPR Article 9 (2) (j) which states that *'processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) (as supplemented by section 19 of the 2018 Act) based on domestic law which shall be proportionate to the aim pursued, respect the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject'*.

We do not believe this processing will cause damage or distress to the pupils. The outcomes of the evaluation will not result in the creation of measures or decisions being made about individual pupils.

### 3 How will personal data be obtained?

NFER will collect personal pupil data from all participating schools using NFER's secure online portal. All assessment papers will be sent out from and returned to NFER using a secure courier.

NFER will collect background data including gender, Free School Meal (FSM) eligibility and Special Education Needs (SEN) status for the trial pupils from the Department for Education's (DfE) National Pupil Database (NPD) using the DfE's secure exchange portal and the Office of national Statistics' secure access procedures.

In addition, eight schools will be selected to participate in anonymous case studies. This will involve a visit from the NFER research team to observe how the programme sessions work in practice. Your child may be observed as part of this, but no further personal data will be collected. Four pupils from each case study school will also be invited to share their views about the programme by participating in a short child-friendly focus group with the teacher present. If your child is selected to participate in a focus group we will contact you in advance to provide you with more information and ask for your permission to invite your child to take part.

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

The following data will be collected for the pupils in each class participating in the study:

- Full name
- Unique Pupil Number (UPN)
- Date of birth
- Gender
- Free School Meal (FSM) status

- Progress Test in Maths (PtM) assessment scores (prior to and following programme delivery)
- Attendance at programme sessions  
Number of programme computer games played, their scores achieved in the games and the time at which they started playing them

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

- Gender
- English as an Additional Language (EAL) status\*
- Eligibility for Free School Meals (FSM)  
Special Educational Needs (SEN) status\*

Pupils selected for focus groups will be asked about their attitudes towards mathematics and their experiences of the programme.

\*considered to be special category personal data

## 5 Who will personal data be shared with?

NFER will share your child's full name, date of birth and UPN with the DfE's NPD team to request the additional background data listed above. NFER will also share this data with GL Assessment to enable marking of the PtM assessments. Your child's assessment score in 2025 will also be shared with their school.

Anonymised pupil assessment scores will be shared with the University of Oxford team after the evaluation report has been published. The University of Oxford will then match this data with pseudonymised teacher data and school IDs that they will collect and hold. Further details around the University of Oxford's research can be found in their Privacy Notice, available on NFER's [project webpage](#).

Three months after the publication of the evaluation report, pseudonymised<sup>1</sup> matched outcome data will be added to the EEF archive, which is managed by the Fischer Family Trust on behalf of EEF and hosted by the Office of National Statistics. 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. Further matching to NPD and other administrative data may take place as part of this research, as per statement on page 5 of [this document](#). At this point, EEF will become the data controller and is responsible for taking decisions about the means and purposes of processing. [FFT Education](#) (FFT) and the designated EEF archive evaluator will act as data processors for the archive. Further information about the EEF archive is available [here](#).

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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 dataset.

We will not name any of the children in any report for this project, nor will we include any information that might mean someone else may be able to identify them.

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

No personal data will be stored or transferred outside of the UK by NFER.

GL Assessment may transfer personal data outside of the UK. However, this is safeguarded by the appropriate contractual safeguard.

## 7 How long will personal data be retained?

NFER will delete any personal data collected as part of the evaluation within one year of publication of the final report. This deletion process is currently planned for March 2027.

Focus group recordings will be deleted as soon as the interview notes / transcripts have been finalised.

## 8 Can I stop my personal data being used?

NFER handles personal data in accordance with the rights given to individuals under data protection legislation. If at any time you wish us to withdraw your data or correct errors in it, please contact the project team, by email at [MR-Y2@nfer.ac.uk](mailto:MR-Y2@nfer.ac.uk).

In certain circumstances, data subjects have the right to restrict or object to processing. They also have the right to make a subject access request to see all the information held about them. NFER will cooperate fully when a subject access request (SAR) is made of them as a data controller. To exercise these rights, please contact NFER's Compliance Officer at [compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk).

## 9 Who can I contact about this project?

NFER is responsible for the day-to-day management of the evaluation. If you have any queries about the project, please contact the NFER project team by email at [MR-Y2@nfer.ac.uk](mailto:MR-Y2@nfer.ac.uk).

If you have a concern about the way this evaluation processes personal data, we request that you raise your concern with us in the first instance (see details above). Alternatively, you can contact the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at <https://ico.org.uk/concerns/>.

## 10 Updates

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

**8 March 2024: Information about the EEF archiving process added.**

**31 October 2024: Clarification added about English as an Additional Language being classified as special category data.**