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## White Rose Maths Reception Jigsaw trial (2025-26): Parents and carers privacy notice

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### 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 'White Rose Maths (WRM) Reception Jigsaw' programme, using a randomised controlled trial. The WRM Reception Jigsaw is a teacher training programme with a focus on early years maths. The programme's objective is to provide a thorough understanding of teaching methodology and subject knowledge required to support children's early mathematical development and to strengthen Reception teachers' confidence in their teaching. The trial aims to ascertain the impact of the programme on Reception pupils' mathematical attainment and will take place over the course of the 2025-26 academic year.

This document outlines how pupils' personal data will be collected and processed for the purposes of this trial.

The Education Endowment Foundation (EEF) has funded this research. For this evaluation, NFER is the data controller and White Rose Education (WRE) is the data processor. This means that NFER will determine the purposes of data processing and WRE will process this data on behalf of NFER.

White Rose Education will also process data to deliver the Reception Jigsaw programme. For this purpose, they are data controllers and are responsible for making decisions about how data is processed. Their privacy notice can be found here: <https://whiteroseeducation.com/privacy-policy>

None of the data collected will be used for any purpose other than those stated in this privacy notice.

### 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.*

The evaluation fulfils one of NFER's core business purposes (undertaking research, evaluation and information activities) and is therefore in our legitimate interest. 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 special personal data is:

*GDPR Article 9 (2) (j) - processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.*

The research should not cause damage or distress to the data subjects. Its outcomes will help to build an evidence base for the use of the Reception Jigsaw programme in Reception and 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 schools participating in the project using NFER's secure online portal. The data will be collected for all pupils enrolled in participating Reception classes in the 2025/26 academic year.

To reduce data collection burden, the trial will measure a sample of children rather than the whole reception year group. NFER will sample up to 24 pupils from each school from the pupil lists provided. The attainment of these pupils will be measured as part of the trial. NFER will inform schools which pupils have been sampled. An observational baseline measure will be completed by Reception teachers for the sampled pupils in September 2025. The data will be submitted by Reception teachers to NFER using an online survey tool called Tivian. Links to each sampled pupil's baseline measure will be shared with schools by NFER via a secure online portal.

20 of the 24 sampled pupils will be selected by NFER to take a maths test (using the Early Years Toolbox app) in June/July 2026. NFER Test Administrators will administer the test with the pupils using an iPad. Pseudonymised<sup>1</sup> assessment data will be stored on password protected iPads, this data will then be transferred to NFER via the NFER school portal.

Further pupil personal data will be obtained indirectly from the National Pupil Database (NPD), via the Office for National Statistics (ONS) Secure Research Service using the Department for Education's (DfE's) secure exchange portal and the Office of National Statistics' secure access procedures. To obtain the information from NPD, NFER will provide the Data Sharing Team at the DfE with the names of the sampled pupils, their dates of birth and UPNs, allowing a match to the National Pupil database (NPD). After the matching process has taken place, NFER will then analyse this data using the Secure Research Service (SRS) based at the ONS. NFER will access the data for analysis through the SRS secure online system. The SRS system does not allow users to remove or copy data from its servers.

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<sup>1</sup> Pseudonymisation is a technique that replaces or removes information (like names or other meaningful identifiers) in a dataset that identifies an individual – in this case pupil names will be replaced by an NFER id. The key linking identifiers to individuals will be stored separately and access will be restricted to authorised NFER staff.

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

We will collect the following personal data about each child enrolled in Reception in 2025/26 directly from the participating school:

- Full name,
- Date of birth,
- Free School Meal (FSM) status.

In addition, we will collect the following personal data about each of the up to **24 sampled children**,

- Unique Pupil Number (UPN),
- Responses to the baseline Observational Checklist (completed by their teacher from the school).

For 20 pupils selected for endpoint testing, we will collect the following additional data:

- Responses to the Early Years Toolbox (EYT) Early Numeracy app (completed with an NFER Test Administrator)
- Early Years Foundation Stage Profile outcomes (EYFSP), sex, eligibility for Free School Meals (FSM), absence and SEN status\* from the DfE's National Pupil Database (NPD) at the end of the Reception year.

\*considered as special category data

## 5 Who will personal data be shared with?

The baseline observational checklist data is collected using online survey software provided by Tivian which stores responses in Azure and Amazon Web Services (AWS) data centre infrastructure in the European Union. Tivian's privacy notice is available here:

<https://www.tivian.com/uk/privacy-policy-2/>

The pseudonymised endpoint assessment data collected using the Early Years Toolbox app will be stored in a password protected iPad.

NFER will share the full name, date of birth and UPN of sampled children with the DfE's NPD team to request the additional background data listed above.

### Data archiving

Three months after the publication of the evaluation report, pseudonymised 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 (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, EEF will become the data controller and is responsible for taking decisions about the means and purposes of processing. NFER will no longer be responsible

for the data and will no longer be the data controller. **FFT Education** (<https://fft.org.uk/about-fft/>) and the designated EEF archive evaluator will act as data processors for the archive.

Further information about the EEF archive is available here:

<https://educationendowmentfoundation.org.uk/projects-and-evaluation/evaluation/evaluation-guidance-and-resources/evaluation-data-archive>

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

When NFER use Tivian to administer the baseline observational checklist, data is securely stored in the European Union (EU). Only personal data required for, and collected as part of, the baseline observational checklist (children's names, dates of birth and responses to the checklist) will be stored outside of the UK.

## 7 How long will personal data be retained?

NFER will delete all data from the App and the iPads by the end of September 2026.

NFER and White Rose Education will delete any personal data after one year from the publication of the final report (due to be published May 2027). Once NFER delete the data, EEF will retain sole data controller responsibility for the archived data.

The deletion process is currently planned for May 2028.

## 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.

Although we value your child's participation in this evaluation and their contribution to important findings, you can withdraw their data 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 in our analysis. Please note that withdrawing your child's data will not be possible once data analysis has commenced (from September 2026). Withdrawing your child's data will not impact the participation of your child's school in the WRM Reception Jigsaw programme. If at any time you wish to withdraw your child's data from the evaluation activities, or correct errors in it, please contact: [jigsawRCT@nfer.ac.uk](mailto:jigsawRCT@nfer.ac.uk).

## 9 Who can I contact about this project?

Any queries about the day-to-day management of the data processing outlined in this privacy notice, please contact the project team at [jigsawRCT@nfer.ac.uk](mailto:jigsawRCT@nfer.ac.uk).

If you have concerns about the way NFER processes personal data, please raise your concern by contacting the Compliance Officer: [compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk).

If you remain dissatisfied, you have the right to lodge 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/>.

## 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.

**Updated May 2025:** To reflect a change in the Early Years Toolbox assessment database.

**Updated July 2025:** To reflect a change in the number of pupils to be assessed as part of this trial.

**Updated January 2026:** To reflect the collection of additional variables (absence, SEN status) from the National Pupil Database.

**Updated April 2026:** To reflect change in the transfer of data from the iPad to NFER.