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## FFT Tutoring with the Lightning Squad Evaluation Privacy Notice for School staff

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This privacy notice is for schools participating in the Evaluation of FFT Tutoring with the Lightning Squad. This is an online reading catch-up programme which aims to help pupils improve their reading skills.

This privacy notice explains what and how data about school staff members will be collected and used as part of the evaluation of the Tutoring with the Lightning Squad programme.

All parties will comply with GDPR requirements and have robust GDPR procedures in place.

### Why are we collecting this data?

The Education Endowment Foundation (EEF) has commissioned the National Foundation for Educational Research (NFER) to evaluate the FFT (Fischer Family Trust) Tutoring with the Lightning Squad programme using a randomised controlled trial (RCT). This trial will assess the impact of the programme on reading abilities of pupils in years 3 and 4. The delivery of the programme will take place from September 2025 to July 2026. The data collected will be used to assess teachers experiences of the programme and any changes to classroom practice as a result of the programme.

NFER is the data controller for the evaluation and will make decisions about how and what personal data is used for the RCT. FFT is supporting the evaluation of the Tutoring with the Lightning Squad programme and acts as a data processor for the RCT.

FFT also processes personal data to deliver the Tutoring with the Lightning Squad programme. In this context, FFT is the data controller and is responsible for making decisions about how that data is processed.

This privacy notice covers any school staff members' data collected or shared as part of the evaluation of the programme.

### What is the legal basis for processing data?

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. Our legitimate interest in processing personal data for this trial is to both administer the RCT and to analyse the data that is collected as part of this RCT. The trial 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 and teachers by providing evidence about the impact of tutoring on learning outcomes and classroom practice. This research

cannot be done without processing personal data, but processing does not override the data subject's interests.

## How will personal data be obtained?

FFT will collect staff personal data via an online Memorandum of Understanding (MoU) when the schools sign up to participate in the programme. This data will be shared with NFER via NFER's secure portal. For further details please refer to the FFT [privacy notice](#).

Nominated school coordinators will be asked to respond to one online survey before the programme starts and another after the programme has ended. These surveys will ask about usual practice in relation to literacy interventions and their experience of implementing the programme for their class. Teaching assistants (TAs) taking part in the programme will be asked to respond to one online survey at the end of programme delivery about their experience of delivering the sessions.

A small number of schools will be invited to participate in case studies. These will involve interviews with the school coordinator and participating TA(s) and observations of programme session delivery. Participation in these additional activities is optional. Interviews will be video recorded, with the participant's permission.

An NFER researcher will also observe one online workshop for school coordinators and one online training for TAs, both of which may include elements of school staff participation.

## What personal data is collected for this project?

FFT will share school details (including personal data for relevant staff members) for all schools agreeing to take part with NFER. The personal data shared with NFER will include the full name, contact details and job roles for the headteacher, key contact, school coordinator (if different from the key contact) and Teaching Assistants (TAs) delivering the programme.

Participant perceptions and experiences of the training and programme delivery will be collected as part of the online surveys, training observations and case studies.

## Who will personal data be shared with?

Staff personal data collected by FFT will be shared with NFER using NFER's secure online portal. NFER will store all data securely with only members of the project team having access.

No staff personal data will be shared with anyone beyond the project team at NFER and the project team at FFT.

The name of the school and participating staff members will not be published in any report arising from this research.

Specific variables from the TA survey to be included in the analysis may be linked to the pupil-level dataset. This includes pupil-level data that will be shared with DfE for matching into the National Pupil Database (NPD). This dataset will not contain any teacher personal data. For information, three months after the publication of the evaluation report, pseudonymised data will be added to the EEF archive, which is managed by the FFT on

behalf of EEF and hosted by the Office of National Statistics. Note that the archiving service provided by FFT to EEF remains separate from its role as delivery partner in this evaluation. 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 the statement on page 5 of this [document](#). At this point, EEF will become the data controller for the archived data and is responsible for making decisions about the means and purposes of processing. [FFT Education](#) (FFT) will act as data processors for the archive. See [EEF's privacy notice](#) for more information on how EEF processes and uses your data.

School coordinator and TA interview data will not be shared with EEF or archived.

The survey will collect information from teachers about their experience with the programme. The online survey data is collected via Tivian which stores survey responses in Azure and AWS data centre infrastructure in the European Union. Tivian's privacy notice is available [here](#).

Microsoft Teams or Zoom may be used for interviews which cannot be undertaken in person. Privacy notices for both online communication tools are available below:

Microsoft Teams – <https://docs.microsoft.com/en-us/microsoftteams/teams-privacy>

Zoom - <https://explore.zoom.us/en/privacy/>

All personal data will be kept strictly confidential and only used for delivering and evaluating the programme.

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

NFER only stores personal data in the UK. When we use Tivian to administer online surveys, data is stored in the EU.

## How long will personal data be retained?

NFER will delete any personal data within one year of publication of the final report, planned for May 2027. For information about data retained by FFT please refer to the [FFT privacy notice](#).

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

NFER handles personal data in accordance with the rights given to individual 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.

## Who can I contact about this project?

NFER is responsible for the day-to-day management of the trial. If you have any queries about this trial, please contact NFER, by e-mail at [TWLtrial@nfer.ac.uk](mailto:TWLtrial@nfer.ac.uk).

FFT is responsible for delivery of the programme. If you have any questions about the programme, please contact FFT by e-mail at [twltrial@fft.org.uk](mailto:twltrial@fft.org.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/>

Further information on this trial and all privacy notices can be found [here](#).

## Last updated

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.