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## FFT Tutoring with the Lightning Squad Evaluation Privacy notice for parents and carers

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Your child's school is 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 your child 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 data collected will also be used to assess pupils experiences of the programme. The delivery of the programme will take place from September 2025 to July 2026.

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 data collected or shared about your child as part of the evaluation of the programme.

### 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. 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 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 and teachers by providing evidence about the impact of tutoring

programmes 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.

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.

## How will personal data be obtained?

FFT will collect pupil data from schools, and this will then be shared with NFER. We will also access background data for your child from the Department for Education’s (DfE) National Pupil Database (NPD) via the Office of National Statistics Secure Research Service.

In addition, your child may be selected to complete assessments of their reading skills and a paper-based survey about their attitudes towards reading both before and after programme delivery. The assessment and survey before programme delivery will be administered by a staff member at your child’s school, and after programme delivery by one of NFER’s Test Administrators.

An NFER researcher will observe, and video-record a tutoring session with a small number of pupils. These pupils will also be invited to participate in an audio-recorded focus group. A member of school staff will be present during these observations and focus groups. Participation in these additional elements is optional and parents of children in the relevant schools will be contacted in advance to **opt in** to these activities. Your child will also be asked whether they wish to participate.

Any personal child data that schools share with NFER – whether via FFT, the online platform or directly – will be transferred using NFER’s secure online portal

## What personal data is collected for this project?

If your child’s school is participating in the trial, the child’s name, date of birth, UPN, gender\*, SEN\* and EAL status, free school meal eligibility, year group and details of any other intervention they may be taking part in will be received from FFT and/or from the NPD.

If your child is one of the around 30 children in year 3 or year 4 nominated by their school to be assessed for the trial, they will complete FFT’s online reading Assessment Programme in September 2025.

If your child is one of the eight pupils in year 3 or year 4 selected for the trial based on their Reading Assessment Programme scores and they are in the intervention year group, FFT will collect the following data and share it with NFER:

- Online reading assessment data on the tutoring platform to determine their starting point on the programme in November 2025.
- Tutoring platform usage data throughout the course of programme delivery.

If your child is one of the eight pupils in year 3 or year 4 selected for the trial based on their Reading Assessment Programme scores (i.e. intervention or control year groups), NFER will collect the following data from pupils:

- Your child’s scores on the Woodcock Reading Mastery Tests 3<sup>rd</sup> edition (WRMT-III) at the endpoint in June/July 2026.
- Your child’s attitudes towards reading and the nature of their home learning environment if they are in year 4 via a paper-based survey in September 2025 and in June/July 2026.
- Your child’s attendance at each of the assessments above will be recorded by the NFER Test Administrator on a paper-based attendance register.

In a small number of schools delivering the FFT Tutoring with the Lightning Squad programme, one tutoring session will be observed by an NFER researcher. One pair of pupils will be video recorded during this session. These pupils will also be invited to take part in a focus group which will be audio recorded. Observations and focus groups will collect data about children’s experiences of the programme, their attitudes towards reading and the nature of their home learning environment. Participation in these additional elements is optional. Further information will be provided to parents of the children concerned in advance of these additional activities, and parents will be required to opt in to these activities for their child to participate.

\*considered to be special data.

### Who will personal data be shared with?

Pupil personal data collected by FFT will be shared with NFER using NFER’s secure online portal.

No pupil 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 pupils will not be published in any report arising from this research.

At the end of the evaluation (i.e., after publication of the final report), NFER will share pseudonymised pupil reading assessment (WRMT-III) scores with FFT for use in their own research on the impact of their programmes. Please refer to [FFT’s privacy policy](#) on how this data will be used. At this point, FFT will become the sole independent data controller.

Three months after the publication of the evaluation report, a pseudonymised pupil-level dataset 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](#) 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 as the designated EEF archive evaluator. See [EEF’s privacy notice](#) for more information on how EEF processes and uses your data.

Observation and focus group data will not be shared with EEF or archived.

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

## Is personal data being transferred outside of UK?

NFER only stores personal data in the UK.

## How long will personal data be retained?

NFER will delete any personal data (including transcriptions) within one year of publication of the final report, expected to be May 2027. Audio recordings of the sessions and focus groups will be deleted once the transcriptions are finalised. This is currently planned for June 2026.

## 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.

## Who can I contact about this project?

NFER is responsible for the day-to-day management of the project. 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.