

Privacy Notice for Parents and Guardians

Evaluation of Peer Assisted Learning Strategies UK

About the project

This information is about the Peer Assisted Learning Strategies-UK (PALS-UK) evaluation project taking place in the 2025/26 and 2026/27 academic years. PALS-UK is a 20-week whole class structured paired reading intervention that aims to improve pupils' reading comprehension and oral reading fluency. Schools participating in the evaluation will be split into two groups, with one group implementing PALS-UK and the other group not. This is so that we can compare what happens in schools that do and do not implement PALS-UK. This evaluation is funded by the Education Endowment Foundation (EEF).

The organisations conducting the PALS-UK evaluation take privacy very seriously and, in light of the UK General Data Protection Regulations (GDPR) and Data Protection Act 2018, this document sets out how we will use and look after the personal information that we will collect about your child. For further information about the evaluation itself, please refer to the Parent Information Sheet, which you should have received alongside this privacy notice.

Details of parties who have access to the data and their roles

Manchester Metropolitan University (ManMet, Evaluation team), and Nottingham Trent University (NTU, Delivery team) are independent data controllers for this project. They make decisions about how and what personal data is used in accordance with the purposes set by the Education Endowment Foundation (EEF). The University of Birmingham (UoB), Fischer Family Trust Education (FFT) and AlphaPlus are data processors. FFT and AlphaPlus have been sub-contracted by ManMet as data collectors. The EEF will become data controller of the archived data at the end of the project.

Delivery team: PALS-UK programme will be delivered by NTU and UoB. NTU and UoB will recruit schools to the project and oversee delivery of training to participating schools, which will take place over the academic year 2026/27. The Delivery Team is led Dr Emma Vardy Associate Professor emma.vardy@ntu.ac.uk, and Professor Helen Breadmore Professor of Literacy and Psychology in Education h.breadmore@bham.ac.uk. The privacy notice relating to NTU can be found here: [Privacy Notice](#), and the privacy notice for UoB can be found here: [Privacy Notice](#)

Evaluation team: ManMet is responsible for conducting an independent evaluation of the PALS-UK programme using data and personal data collected by the Data Collection Team, the Delivery Team and the Evaluation Team. The team is led Professor Stephen Morris and Dr Helen Lawson. The Evaluation Team is an independent Data Controller in respect of any personal data of pupils/and or teachers which they process for the purposes of the project.

Data Collection team: FFT Education (FFT) and AlphaPlus will collect data and personal data from participating schools on behalf of ManMet. They will act as Data Processors as they will collect data specified by ManMet.

Funders: The EEF, established in 2011, is an independent charity focused on supporting schools, colleges, and early years settings to improve outcomes for disadvantaged children and young people through better use of evidence. The EEF will receive the results of the evaluation. At the end of the trial, the Evaluation Team will submit the data to the EEF Archive Manager, see below. The EEF become Data Controller for the pupil outcome data at the end of the project once the data is submitted to the EEF Data Archive Manager, currently FFT (Data Processor for the archive). The privacy notice relating to participating in an Education Endowment Foundation project can be found here: <https://educationendowmentfoundation.org.uk/privacy-notices/guidance-on-data-protection-for-schools-and-settings-involved-in-an-eef-funded-project>.

Data Archive Manager: The EEF Data Archive Manager is currently FFT Education. At the end of the trial, the Evaluation team will securely submit pupils' assessment data (pupil-level impact data) to the EEF Data Archive Manager for storage through the Secure Research Service offered by the Office for National Statistics. A unique identifier, the Pupil Matching Reference (PMR), is used as a pseudonym for the pupil. It is provided by the Department of Education who hold the details of who each PMR relates to. Lawful access to the archived data may be made available for future research. You can find the EEF data archive privacy notice <https://educationendowmentfoundation.org.uk/privacy-notices/privacy-notice-for-the-eef-data-archive>

Why are we collecting data from your child?

The aim of this trial is to evaluate the effects of the PALS-UK programme on reading attainment (primary outcome), and oral reading fluency and oral reading comprehension (secondary outcomes). The results of this evaluation will make an important contribution to understanding what works in teaching and learning reading. By participating in the trial, schools will contribute to furthering our knowledge of strategies for whole-class improvement in reading.

What personal data do we collect, how do we collect it, and what will it be used for?

Personal data means any information about an individual from which that individual can be identified. Personal data will be collected by the Data Collection team and the Evaluation team. The Data Collection team will share the data they collect with the Evaluation team. For the purpose of research, some personal data (your child's name and date of birth) will be shared between the Data Collectors and ManMet.

Unless you or your child chooses to withdraw from the project, the Evaluation team will collect, use, and store personal data for each child in the trial. At the end of the project, pupils' assessment data from all participating schools (scores from writing assessments and questionnaires about reading) will be archived by the EEF's Data Archive Manager, FFT Education, on behalf of EEF. FFT will match pupil records with the Pupil Matching Reference (PMR), an identifier that is stored in the National Pupil Database (NPD), and meaningless to anyone outside the Department for Education (DfE). All other personal data that can identify an individual will be deleted prior to archiving. This enables evaluation data to be matched

with other variables from the National Pupil Database in subsequent research. Further detail about the storage and use of data within the EEF archive can be found here: <https://educationendowmentfoundation.org.uk/privacy-notice/privacy-notice-for-the-eeef-data-archive>. No individual school, parent or child will be identified in any report arising from the research.

The study has received full ethical approval from ManMet. Parents have the right to withdraw their child from the project. If you choose to withdraw your child from the project, and notify us by July 24th 2027, further data about your child will not be collected by the Data Collection team or the Evaluation team. You can also request that any data already collected will be destroyed. Requests to withdraw and/or delete your child's data after this point may not be possible, but will always be considered.

Your child's data will be treated with the strictest confidence and shared and stored securely, as outlined below, in line with the UK General Data Protection Regulations (GDPR) and Data Protection Act 2018.

The table below details what data will be collected, who will collect it, who will use it, for what purpose, and how it will be collected.

Personal Information Data				
Data (what will be collected?)	Source (who will collect?)	Receiver or Permitted recipient	Purpose (what will be used for?)	How do we collect the data?
The names of pupils who are withdrawn from the data processing will be collected from parent withdrawal forms.	Your child's school (Data Controller)	ManMet (Data Controller) – names of withdrawn pupils will be shared with ManMet only if pupils withdraw after the 2 week opt-out period so Manchester Met can delete all existing data	Withdrawal forms	Paper and electronic forms
Administrative pupil data for all participating Year 4 pupils (who will be in Year 5 in 2026/27) to be requested from schools: First name, surname, Unique Pupil Number (UPN), Date of birth, Gender, Class or form, ever FSM status, SEND (EHC or support), EAL, Academic year that pupil first starts state school	FFT Education (Data Processor)	ManMet (Data Controller) AlphaPlus (Data Processor) – to receive name, UPN and date of birth only	Matching pupil records; assessment of impact on outcomes; academic publications	Electronic data transfer

Personal Information Data				
Data (what will be collected?)	Source (who will collect?)	Receiver or Permitted recipient	Purpose (what will be used for?)	How do we collect the data?
KS2 reading scores from the National Pupil Database (NPD)	ManMet (Data Controller)		Assessment of impact on outcomes	Electronic data transfer
Pupil consent forms for group interviews (small sample of Year 5 pupils, in 8 schools)	Man Met University (Data Controller)		Evidence consent to take part in the project.	Paper and electronic forms
Pupil outcome data collected pre-trial for the evaluation: <ul style="list-style-type: none"> - New Progress in Reading Assessment (PiRA). Paper-based - The Reading Engagement Scale (RSCS). Online 	AlphaPlus (Data Processor)	ManMet (Data Controller)	Assessment of impact PALS-UK on reading attainment and reading engagement for evaluation purposes, academic publications	New PiRA: paper forms to be securely shipped; scores transferred to spreadsheet and transferred via secure electronic transfer RSCS: Electronic transfer, electronic form
Pupil outcome data collected after the intervention for the evaluation: <ul style="list-style-type: none"> - New Progress in Reading Assessment (PiRA). Paper-based - The Reading Engagement Scale (RSCS). Online - The Wechsler Individual Achievement Test - Third Edition (WIAT-III), oral reading comprehension. Paper-based 	AlphaPlus (Data Processor)	Manchester Met (Data Controller)	Assessment of impact PALS-UK on reading attainment and reading engagement for evaluation purposes, academic publications	RSCS: Electronic transfer, electronic form New PiRA: paper forms to be securely shipped; scores transferred to spreadsheet and transferred via secure electronic transfer WIAT-III: administered by a trained professional, paper forms to be securely shipped; scores transferred to spreadsheet and transferred via secure electronic transfer
Interview notes and recordings with small sample of Year 5 pupils, in 8 schools	ManMet University (Data Controller)		Process evaluation	Paper and digital notes; digital recording
Field notes from a small sample of observed PALS-UK lessons	ManMet University (Data Controller)		Process evaluation	Paper and digital notes

At the end of the project, all pupil administrative and outcome data identified in the above table will be transferred to the EEF Data Archive Manager, FFT Education (Data processor), and the EEF becomes Data Controller. As described above, FFT Education will match the data to the PMR and then delete personal data (apart from a unique identifier). Pupil interview and field notes data will be anonymised and archived by Manchester Met. Data may then be used for long-term follow-up analyses.

How will personal data be stored and shared?

The Evaluation team have put appropriate security measures in place to keep personal data secure and to prevent any unauthorised access to or use of it. The Evaluation team, the Delivery Team and the Data Collection team will collect and store all evaluation data in accordance with The UK Data Protection Legislation.

Data will be transferred from FFT and AlphaPlus to ManMet via a secure transfer site. Data transferred between the Delivery and Evaluation teams will be via a secure transfer site. All research data will be held within a secure research area agreed with ManMet's Head of Information Security. Any information identifying pupils collected via interviews or observations from case study schools will be given a unique code for each participant immediately after collection and prior to analysis to reduce risk. Manchester Met will securely transfer data to the EEF's Data Archive Manager at the end of the project under EEF guidance.

No personal data for this project will be stored or transferred outside of the UK or European Economic Area (EEA).

For the purposes of archiving and further research, pupil-level impact data (e.g., reading test results) and pupils' personal data (e.g., name, date of birth, UPN) will be shared with EEF's Data Archive manager (FFT). FFT will match pupil records with the Pupil Matching Reference (PMR), an identifier that is stored in the National Pupil Database, and meaningless to anyone outside the Department for Education (DfE). All other personal data that can identify an individual pupil will be then deleted prior to archiving.

The remaining data will then be archived in the Office for National Statistics' Secure Research Service (ONS SRS). After anonymisation, data collected as part of evaluations funded by the Education Endowment Foundation (EEF) are archived in order to estimate the long-term impact of interventions. Data from interviews, questionnaires, and field notes will not be archived by the EEF.

Legal basis for processing

The data processing is necessary for the parties to undertake a research project into the effectiveness of the PALS-UK with a focus on its impact on pupils in Year 5 (as of September 2026). This project is **in the public's interest** as the results will help assess the impact of the Power of Reading programme on pupils' reading and writing.

Specifically, ManMet and NTU rely on the below processing conditions under the GDPR in order to process personal data (data which identifies someone such as name or date of

birth) and sensitive and/or special category personal data (sensitive data such as free school eligibility) under this agreement;

- Personal data: The processing is necessary for the performance of a public task (namely the performance of the University's research functions) (article 6(1)(e));
- Special category personal data: The processing is necessary for research purposes in the public interest (article 9(2)(j)).

EEF relies on the below processing condition to process personal data under this agreement

- Personal data: The processing is necessary for purposes of legitimate interests (article 6(1)(f));
- Special category personal data: The processing is necessary for research purposes in the public interest (article 9(2)(j)).

In this project, we are collecting personal data that is treated as sensitive and/or special category data by the DfE: Free School Meal eligibility, Special Educational Needs (categorised as having an Education, Health and Care plan, or Support plan) and English as an Additional Language status for pupils.

Data collected will not be used for any automated decision making or profiling.

Retention period for the data

Personal data will be used throughout the duration of the project. The researchers will send data and personal data to the EEF's Data Archive Manager, currently FFT, at the end of the project to be archived and will destroy all personal data they hold by July 31st 2029. The evaluation data in the Data Archive will be held indefinitely but as described above, all personal data will be deleted by the Data Archive Manager, once the pupil records have been matched to the DfE's Pupil Matching Reference.

At the end of the project, data collected from you and your child, from focus groups for example, will be anonymised and retained for 10 years for future research by Manchester Met (July 31st 2037).

What will happen if my child does not take part in the evaluation?

We very much hope that you will allow your child to participate in the research project and for their data to be collected and processed. If you choose to withdraw your child from the project, and notify us by August 30th 2027, further data about your child will not be collected by the Data Collection team or the Evaluation team. You can also request that any data already collected will be destroyed. Requests to withdraw and/or delete your child's data after this point may not be possible, but will always be considered. Your decision will not adversely affect your child's grades or access to services or programs at your child's school.

Subject's rights under GDPR

If you do not want your child to take part in this project, you can sign the withdrawal letter. You can also notify your school at any time during the research project if you no longer want your child to participate in data processing. Please be aware that withdrawing from the study will not affect the lawfulness of any processing we conducted prior to your withdrawal. If your child withdraws from the study after the study has commenced, you can request that any personal data collected prior to this point will be destroyed.

The GDPR provides data subjects with the following data subject rights:

- The right to be informed – this privacy notice assists with fulfilling these obligations;
- The right of access;
- The right to rectification;
- The right to erasure;
- The right to restrict processing;
- The right to object.

Please note, that these rights apply in certain circumstances, for example according to the lawful basis utilised by the Controllers. The right of access to personal information held about you exists in order to be aware of, and verify, the lawfulness of the processing. Please use the contact information below to exercise these rights.

Contacting us

For questions or concerns about this Privacy Notice, or our use of your personal information, please contact Dr Helen Lawson at ManMet in the first instance. Please contact her at h.lawson@mmu.ac.uk, or in writing to: Faculty of Health and Education, Manchester Metropolitan University, Brooks Building, 53 Bonsall Street, Manchester, M15 6GX.

For any questions or concerns about the use of your personal information and the delivery of PALS-UK please contact Dr Emma Vardy at emma.vardy@ntu.ac.uk.

You may also contact the Education Endowment Foundation with any questions about the EEF Archive at info@eefoundation.org.uk, or telephone 0204 536 3999, or in writing to: Education Endowment Foundation, 5th Floor, Millbank Tower, 21-14 Millbank, London, SW1P 4QP.

ManMet's Data Protection Officer can be contacted at dataprotection@mmu.ac.uk, or telephone 0161 247 3884 or in writing to: Data Protection Officer, Legal & Governance, Ormond Building, Lower Ormond Street, Manchester Metropolitan University, Manchester, M15 6BX.

Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) as the supervisory authority in respect of the processing of your personal data. We would encourage you to expend our internal complaints procedure through our initial contact and the



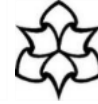
Education
Endowment
Foundation



Nottingham Trent
University
Psychology



UNIVERSITY OF
BIRMINGHAM



Manchester
Metropolitan
University

University Data Protection Officer, prior to contacting the ICO. Please contact: casework@ico.org.uk or telephone: 0303 123 1113. For any further contact information please see: <https://ico.org.uk/global/contact-us/>.

Updates to this privacy notice

We may update this privacy notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.