



# Privacy Notice

31/03/2025 Version 0.7

## 1. Background

The Education Endowment Foundation (EEF) is funding a research study looking at Writing Roots, a whole-school programme designed to improve children's writing.

Delivered by Literacy Tree, Writing Roots is a whole-school book-based curriculum and professional development programme aimed at improving writing outcomes for pupils aged 4–11 (Year 1 to Year 6). Through daily one-hour lessons, pupils engage with diverse texts and explicit teaching of writing conventions, as an alternative to the conventional 'genre-based' approach to teaching writing, to improve confidence, motivation and stamina whilst developing their writing skills. Writing Roots aims to raise the profile of writing in schools more generally, encouraging schools to consider how they foster a writing culture and make pupil writing visible, with the idea that motivation and engagement are pre-requisites to the development of writing skills.

## 2. About the research project

RAND Europe and the School of Education at the University of Leeds are the independent researchers.

The aim of the research project is to understand if Writing Roots improves children's writing outcomes, by comparing data from children in schools that take part in Writing Roots to similar children in schools that did not take part in the programme. The intended outcomes of the programme include writing skills and writing self-efficacy—pupils' beliefs in their own writing ability. The research is therefore expected to make an important contribution to understanding what works in developing children's writing and pupil attainment, as well as effective teaching strategies.

This privacy notice is for the parents/guardians of children who Year 2 and Year 5 in the 2025/26 academic year in schools which are participating in the Writing Roots research project. It sets out the ways in which RAND Europe and the University of Leeds, use, store, and share your child's data. It also sets out how long we keep this data and what rights you have in relation to this data under the General Data Protection Regulation (GDPR).

## 3. Who is involved in the research study?

The research is being funded by the EEF, an organisation that funds research into education. RAND Europe and the University of Leeds are doing the research. RAND Europe and the University of Leeds will collect and analyse data on child outcomes through child-friendly writing tasks and validated tools of writing self-efficacy. In summer 2025, your child's teacher will ask them to complete a writing task which will be shared with researchers. In summer 2026, in coordination with the classroom teacher, assessment administrators

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trained by the University of Leeds will visit the school to administer a second writing task with all Year 5 and Year 2 pupils. They will also administer a survey on writing self-efficacy with pupils in Year 5. This means that they will not have direct contact with your child without the presence or awareness of the teacher or a staff member from within the school. Some schools will be selected to take part in case studies. In these schools, researchers will conduct a focus group with selected children to hear their views on their writing lessons. All researchers and data collectors will have completed safeguarding and data protection training, and undergone all the necessary checks including a recent Disclosure and Barring Service (DBS) certificate check. Literacy Tree have designed the programme and are responsible for its delivery (the 'delivery team').

#### **4. Where do we get your data from and what data do we collect?**

The researchers collect personal data<sup>1</sup> about your child for the purposes of conducting the research, to evaluate the impact and effectiveness of the Writing Roots programme, as well as to prepare a report about the study.

Your child's school will share the following information about your child:

- Full name
- Date of birth
- Gender
- Unique Pupil Number
- School Unique Reference Number
- Writing sample based on a prompt given by the evaluation team, administered by the class teacher.

This information will be collected from the National Pupil Database (NPD):

- Free School Meals (FSM) status
- English as an Additional Language (EAL) status
- Special Educational Needs (SEN) status
- Key Stage 2 outcomes for Year 5 pupils when they are in Year 6

This data will be matched to the following child outcomes, which will be collected from participating children via assessments conducted by trained assessment administrators from the University of Leeds:

- Writing sample based on a prompt given by the evaluation team
- Writing self-efficacy measure (for children in Year 5)

A Data Sharing Agreement (DSA) will be put in place with your school, University of Leeds, RAND Europe, and Literacy Tree before any data is collected. The DSA will fully specify the data to be collected and for what purpose, who will collect it, how it will be shared, how it will be stored, who will have access to it and how long we will keep it for.

#### **5. Who will hold your child's data?**

During the period of the research project, no one outside the research team will have access to your child's data. RAND Europe and the University of Leeds will act as joint controllers for the data throughout the evaluation period. This means that both parties will share responsibility for ensuring your child's data

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<sup>1</sup> By 'personal data', we mean any information about you or your child which could be used to identify you, such as your name.

remain protected throughout the research project, including making sure that it is stored and shared securely. After the end of the research project, the DfE and EEF will become sole controllers of the data.

RAND Europe and the University of Leeds will be joint controllers of the data and will make decisions about how and what personal data is used, in accordance with the purposes agreed with the EEF. RAND Europe will lead on the processing of the pupil data – that is, they will be the main point of contact for any matters relating to the protection of all personal data. Literacy Tree (the delivery team, funded by the EEF) will act as data processors throughout the evaluation period and will process the data, in accordance with the ways and purposes set by the joint controllers.

RAND Europe and the University of Leeds are both registered with the Information Commissioner's Office. RAND Europe's registration number is Z6947026, and the University of Leeds' registration number is Z553814X.

## 6. How will we collect, share and use your data?

As part of the research, RAND Europe and University of Leeds will collect information from schools about children that take part in Writing Roots (as specified in Section 4). Schools will provide this information by using an Excel data collection form provided by researchers. This form will be shared via secure file transfer (e.g., Egress). Schools will also administer a writing task at the beginning of the evaluation (summer 2025) and share this with researchers. The University of Leeds will send assessors to administer a second writing task and a self-efficacy survey to children in your child's year group in all schools at the end of the research project. Writing samples will be sent to RAND Europe securely (e.g., via courier if paper, or secure file transfer if digital). Writing samples will be stripped of names (i.e., pseudonymised) and marked automatically by Artificial Intelligence (AI) with servers hosted in the US. No personal, identifiable data will be shared outside the EU in line with GDPR. The researchers will use the data provided by schools on children and collected by the University of Leeds to compare the results of children in Writing Roots schools to similar pupils that did not receive the programme to measure if there is any difference between the two groups.

At the end of the study, RAND Europe will submit the data to the Office for National Statistics Secure Research Service (ONS SRS). Personal data will then be stripped of any identifying information for archiving in the EEF data archive (managed by EEF's archive manager).<sup>2</sup> This data will only be identifiable to the DfE and may be matched to the National Pupil Database (NPD) and other administrative data during subsequent research. The EEF and DfE will act as data controllers for the archive, along with contractors appointed to manage the archive. **No individual will be named in any report or other output for this project.**

## 7. What is our legal basis for processing your data?

The legal basis for RAND Europe to process your child's personal data is legitimate interests, as detailed in Article 6(1)(f) of the UK GDPR. The legal basis for processing your child's special category data<sup>3</sup> is because it is necessary for archiving purposes in the public interest, scientific, or historical research purposes as detailed in Article 9(2)(j) respectively of the UK GDPR. To ensure that all processing is fair and lawful, RAND Europe have also completed a Legitimate Interest Assessment and a Data Protection Impact Assessment, in addition

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<sup>2</sup> You can find more information about the EEF archive on the EEF's website:

<https://educationendowmentfoundation.org.uk/privacy-notices/privacy-notice-for-the-eef-data-archive>.

<sup>3</sup> 'Special category' data is personal data that needs more protection because it is sensitive, for example health or ethnicity data.

to the completion of an application to the RAND internal review board for ethical approval (see Section 8 below). RAND Europe will process only what is required to meet these legal bases and will ensure security and safeguards are in place to protect the information.

The legal basis for the University of Leeds, EEF and DfE to process your child's personal data is where it is necessary for the performance of a task carried out in the public interest as set out in Article 6(1)(e) of the UK GDPR. The specific legislation which allows this is Section 10 of the Education Act 1996. The legal basis for processing special category data is for reasons of substantial public interest as detailed in Article 9(2)(g) of the UK GDPR.

## **8. Ethical Approval**

The study has received ethical approval from RAND Europe's internal review board [granted 24/02/2025, ref: 022807.021]. It has also received ethical approval from the University of Leeds Cross-Faculty Research Ethics Committee (Faculties of Business, Environment & Social Sciences) (Ref: 2583).

## **9. How do we keep your data secure?**

RAND Europe and the University of Leeds takes information security extremely seriously and have implemented appropriate technical and organisational measures to protect personal data. RAND Europe and the University of Leeds will process all personal data in accordance with the Data Protection Act 2018 and EU & UK GDPR 2016 requirements.

Data will be held on a server located in RAND Europe's Cambridge, UK office. Backups taken for disaster recovery purposes will be encrypted and stored in a secure site within the UK. No personal data will be transferred outside the EU and all measures will be taken to ensure that data going to US servers as part of the writing script marking by AI will be stripped of personal data and managed appropriately, following established RAND Europe guidelines.

University of Leeds will not process special category data collected for use in this study (i.e., SEND or EAL status). Access to information is restricted on a need-to-know basis and security arrangements are regularly reviewed to ensure their continued suitability. No personal information collected as part of University of Leeds's analysis will be transferred outside of the European Economic Area (EEA).

For further information about how we will share your data, please refer to Section 6 above.

## **10. How long will we keep your data?**

All individually identifiable data held by RAND Europe and the University of Leeds will be destroyed one year after the end of the study in December 2029. Data in the EEF's archive in the ONS SRS will include data only individually identifiable to the Department for Education (DfE), the government department responsible for children's services and education, and is kept indefinitely for the purposes of future research.

## **11. What rights do you have in relation to your data?**

Under the General Data Protection Regulation, you have rights in relation to yours and your child's data, including a right of access to the data (Article 15 of the GDPR), a right to rectification (Article 16 of the GDPR), erasure (in certain circumstances; (Article 17 of the GDPR)), restriction (Article 18 of the GDPR) and objection (Article 21 of the GDPR).

You are free to withdraw your child's data from the study at any time before the end of the study (December 2028) (information already collected about your child will be removed from our datasets). In this event, please tell your child's school who will communicate this to the research team, or you can contact us directly using the details below. Your child can still participate in the programme even if you withdraw your child from the study.

If you wish to exercise any of the rights set out above in connection with this research project, please email us or write to us at the contact addresses below.

## **12. Right to complain**

If you are unhappy with the way in which the research team has handled your child's personal data, we ask that you contact us in the first instance, to enable us to resolve your concerns. If you remain dissatisfied, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, by emailing [casework@ico.org.uk](mailto:casework@ico.org.uk). Further information about how you can exercise your right to complain is available at [www.ico.org.uk](http://www.ico.org.uk).

## **13. Changes to our privacy notice**

We may change this Privacy Notice from time to time. If we make any changes in the way we treat your child's personal information, we will make this clear by contacting schools and ensuring they provide you with an updated version of this Privacy Notice.

## **14. How to contact us**

If you have any questions about this privacy notice or concerns about how your child's data is being processed, you can get in touch by:

- Contacting RAND Europe at [WritingRoots-research@randeurope.org](mailto:WritingRoots-research@randeurope.org)
- Contacting RAND Europe's Data Protection Officer, Rani Viknaraja ([rviknara@randeurope.org](mailto:rviknara@randeurope.org)) and quoting Ref: 022807.021 "Writing Roots" or in writing to Data Protection Officer, RAND Europe, Eastbrook House, Shaftesbury Road, Cambridge, CB2 8DR, United Kingdom.