



Education Endowment Foundation (EEF) Adventure Learning Evaluation: Commando Joe's Inspire to Achieve Programme

Privacy Notice

The following privacy notice explains how data will be collected, used, and stored for the independent evaluation of the Commando Joe's (CJ's) programme, funded by the Education Endowment Foundation (EEF).

Data Controllers and Processors:

- Department of Education, University of York: Evaluator and Data Controller for research data
- Commando Joe's (CJ's): Delivery Partner and Data Controller for programme delivery and quality assurance data.
- FFT Education Ltd: Data Processor on behalf of the University of York, responsible for data linkage
- Department for Education (DfE): Data Controller for National Pupil Database (NPD) data

Please see Commando Joe's Privacy Notice [here](#) for details specific to their own data processing.

1. Why we are collecting data

This project is part of an Education Endowment Foundation (EEF) funded evaluation of the Commando Joe's programme. The study aims to understand whether the programme improves pupils' self-regulation, resilience, teamwork, wellbeing, and longer-term attendance and attainment. To evaluate both the impact and implementation of the programme, data will be collected from schools, pupils, and CJ's delivery staff. Participation in the evaluation is voluntary. Schools and participants may withdraw at any time before data are anonymised. Once anonymised, individuals can no longer be identified and withdrawal is no longer possible.

2. Legal basis for data processing

University of York processes data under Article 6(1)(e) of the UK GDPR (public task) for research carried out in the public interest.

Commando Joe's processes data under Article 6(1)(f) (legitimate interests) to support safe delivery, quality assurance, and programme improvement.

3. What data will be collected

From schools (shared with the University of York):

- Pupil names, dates of birth, gender, unique pupil numbers (UPNs), and postcodes
- Year group and school ID
- Attendance and attainment data (via the National Pupil Database)

From Commando Joe's (for programme delivery and quality assurance):

- Pupil names, dates of birth, and gender
- Session attendance and participation logs
- Delivery records and implementation data (e.g., lesson completion, duration, group details)
- Quality assurance data (e.g., delivery monitoring forms, fidelity checks, facilitator reflections, and internal delivery ratings)
- School contextual information (e.g., cohort details, lead teacher contact)

For evaluation (University of York):

- CJ Staff focus groups, teacher focus groups from a small number of schools, and pupil interviews from a small number of schools (audio-recorded with consent, then transcribed and pseudonymised).
- Pupil questionnaires on self-regulation, reliance, peer and teach relationships, and mental wellbeing.

CJs will share only pseudonymised data (e.g., school or group codes, summary information) with the University of York for evaluation purposes.

Identifiable delivery data remain securely within CJ's systems and are not shared with the University.

4. How data will be collected and stored

- Pupils at school will enter questionnaire data directly into secure Qualtrics links hosted by the University of York.
- CJ's will collect delivery and quality assurance data through its internal secure databases and pseudonymise these before sharing.
- Identifiable information (e.g., names and postcodes) will be replaced with study IDs and stored separately from research data.
- Data are stored on secure servers managed by the University of York, FFT, and CJ's.

5. Who data will be shared with

- FFT Education Ltd acts as Data Processor, matching study IDs to DfE's National Pupil Database. FFT will securely transfer pupil identifiers (UPN, name, date of birth, postcode) to the DfE to request matched data. The matched dataset returned to the University of York will not contain direct identifiers.
- Department for Education (DfE) provides pupil background, attendance, and attainment data from the National Pupil Database.
- Education Endowment Foundation (EEF) receives anonymised data for evaluation oversight and archiving in their secure Evaluation Database.

No identifiable data will be shared with the EEF or any other third parties.

6. How long data will be kept

- Identifiable and pseudonymised data will be deleted by the University of York and Commando Joe's within six months of project completion (estimated early 2030).
- Questionnaire and interview transcripts will be securely deleted within 6 months of publication of the final report.
- Anonymised data (from which no individual can be identified) will be archived indefinitely in the EEF Evaluation Database.

7. How we ensure data security

- Electronic data are held on secure servers managed by the University of York, Commando Joe's, or FFT.
- All transfers use secure, password-protected or encrypted channels.
- Access is limited to authorised personnel.
- Paper records are kept in locked cabinets in restricted-access areas.

8. Rights of data subjects

Under UK GDPR, schools and pupils have the right to:

- Access the personal data held about them
- Request correction of inaccurate information
- Restrict or object to processing (where lawful)
- Request deletion of data before anonymisation

Once data are anonymised, individuals can no longer be identified, and these rights no longer apply.

To exercise these rights, please contact the University's Data Protection Officer using the details below.

9. Contact information

For questions about this project or data processing, please contact:

Department of Education, University of York

Evaluation Team: adventure-learning-education-project@york.ac.uk.

Data Protection Officer: dataprotection@york.ac.uk

Education Ethics Committee: education-ethics@york.ac.uk

Commando Joe's

Project Manager: Jimmy Thorpe, email: thorpe.j@commandojoes.co.uk

If you have concerns about data handling, you can contact the University's Data Protection Officer or the Information Commissioner's Office (ICO).