

**DATA PROTECTION DECLARATION  
PIRLS 2026 EARLY LEARNING SURVEY AND PUPIL QUESTIONNAIRE**

The information provided below applies to PIRLS 2026 data and National Comparison Study data. Ireland will participate in the National Comparison Study as part of the Main 2026 Data Collection.

**Identity and Contact Details of Controllers**

Educational Research Centre  
DCU St Patrick's Campus  
Drumcondra Road Upper  
Dublin 9  
Ireland  
Telephone: +353 1 837 3789  
Email: [pirls.ireland@erc.ie](mailto:pirls.ireland@erc.ie)

and

Stichting I.E.A. Secretariaat Nederland (hereinafter "IEA")  
Keizersgracht 311  
1016 EE Amsterdam  
The Netherlands  
Telephone: +31 20 625 3625  
Email: [secretariat@iea.nl](mailto:secretariat@iea.nl)

The Educational Research Centre (ERC) and IEA have concluded a joint controller agreement, which regulates their respective roles and responsibilities in the processing of personal data.

**Data Protection Officer**

ERC's Data Protection Officer can be reached at: [data.protection@erc.ie](mailto:data.protection@erc.ie)

IEA's Data Protection Officer can be reached at: [dataprotection@iea.nl](mailto:dataprotection@iea.nl)

**For which purposes are data collected and processed?**

The data collected during the Progress in International Reading Literacy Study (PIRLS) 2026 will be used exclusively for scientific research purposes. PIRLS is an educational research project sponsored by the International Association for the Evaluation of Educational Achievement (IEA).

The National Comparison Study is offered as a national option for countries that wish to conduct an additional comparison study between the digital and paper formats. The study consists of administering a smaller, paper assessment, based on trend texts and items that were administered in PIRLS 2021, to a comparable sample of pupils from the same target population as the digital assessment.

The Educational Research Centre (ERC) is administering PIRLS in Ireland at the request of, and on behalf of, the Department of Education and Youth. This is in accordance with one of the functions ("carrying out national and international assessments of the attainment levels and

academic achievement of pupils and reporting on such assessments to the Minister") set out in the ERC's Establishment Order as a statutory body (which can be viewed in full at: <http://www.irishstatutebook.ie/eli/2015/si/392/made/en/print>). The ERC's legal basis for processing personal data as per GDPR (Article 6) is "processing is necessary for compliance with a legal obligation and in line with the functions of the ERC".

### **Which information is requested?**

The parents or legal guardians of Fourth class pupils in the participating classes are invited to complete the PIRLS 2026 Early Learning Survey/Home Questionnaire in order to provide the study with information about early learning activities and the language at home, the first language of the child, the occupation and educational background of the parents/guardians, home resources, and opinions regarding the child's school.

Pupils in the participating schools are invited to complete the PIRLS 2026 Pupil Questionnaire in order to provide the study with information about pupils' gender, month and year of birth, home resources, their reading outside of school, the language(s) spoken at home, and their opinions regarding the school environment and literacy lessons, as well as how often they feel happy, motivated, or sad at school.

- In order to ensure that PIRLS is based on scientifically selected samples of pupils and schools, schools are expected to cooperate with the administration of PIRLS in their school where requested to do so (Department of Education Circular 0040/2024).
- Parents/guardians or pupils will not be disadvantaged in any way by non-completion of the questionnaire, and respondents are permitted to skip individual questions or to discontinue answering the questions at any time.
- By filling in and returning a completed questionnaire, a study participant agrees to the collection and processing of their data within the questionnaire.
- Withdrawal of agreement to the processing of data without stating any reason can be made by any participant up to 4 weeks after the tests have been administered.
- Any participant who wants to remove or amend their information can contact the Educational Research Centre (at [pirls.ireland@erc.ie](mailto:pirls.ireland@erc.ie)). If an individual withdraws from the study, no additional data will be collected from that individual. Some information on withdrawals and exclusions is retained to validate the sample and to inform future administrations (e.g., to see if boys are more likely than girls to withdraw from participation in the study). Any such retained data cannot be linked back to individuals.
- Queries related to how personal information is protected can be directed to the ERC's Data Protection Officer ([data.protection@erc.ie](mailto:data.protection@erc.ie)).

### **What kinds of data are collected?**

Data from the answers to the questions from pupils participating in PIRLS 2026, and from their parents/guardians, are collected and stored. This is in the form of numbers representing selections (e.g., a multiple-choice question or yes/no selection). If the survey is administered electronically (rather than on paper), there is further logging information stored regarding the first and latest log-in time, clicks on navigation buttons, and whether or not the questionnaire has been submitted. In addition, the following log data is captured: all navigation events; each

click on a checkbox/radio button; each selection in a drop-down; focus (putting the cursor into the box) and blur (putting the cursor outside the box).

This information cannot, in and of itself, be used to identify individual respondents by name; however, a Pupil ID is recorded to uniquely identify each pupil. The relationship between this ID and the pupil's name is known to the school coordinator, and to the Educational Research Centre, and may be known to the ERC's subcontractors (e.g. our data entry partners). It is not, however, shared with the IEA or any other third parties.

### **Where, how, and for how long are data from PIRLS 2026 stored?**

PIRLS 2026 data are stored securely in a pseudonymous form, that is, processed in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information (any such additional information being kept separately and subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person). These data cannot be accessed by any external persons or systems.

Moreover, any ERC or IEA employees who access the data for processing have been suitably briefed on what constitutes an acceptable treatment of data and have signed a confidentiality agreement.

The data are stored as follows:

Response data are stored indefinitely so that they remain available for analyses. These responses eventually result in a database that allows researchers to compare education systems worldwide (see public accessibility below).

Digital response data are collected and stored at two locations.

- 1) Student achievement data (RM Education Limited) is collected and stored (including backups) on AWS servers in Europe.
- 2) Questionnaire data (IEA) are collected and stored (including backups) on Microsoft Azure servers in Amsterdam, the Netherlands.

The IEA SharePoint server where WinW3S data and data from paper instruments is uploaded by countries is hosted by Microsoft within the European Union.

All data are submitted without names—only the pupil ID numbers are shared with IEA.

### **At the ERC, the data are stored as follows:**

Data linked to individual pupils are stored until the international database is released (expected to be December 2027 for this cycle of PIRLS). At that point (or earlier in the cycle where possible), all data are anonymised so that there is no possibility of an individual study participant being identifiable.

### **With whom and how are data from PIRLS 2026 shared?**

As part of initial processing, the ERC shares some data from PIRLS with its subcontractors (e.g. for data entry for paper questionnaires). All subcontractors have signed a Data Processing Agreement and confidentiality agreement with the ERC.

PIRLS 2026 is directed by the international study center (ISC) based at Boston College, USA, and most of the data analyses occur there. Response data are required for the analysis but are sent to the ISC, via a secure SharePoint server, in a pseudonymous form. ISC employees who access the data for analyses have signed a confidentiality agreement and have received comprehensive training on data protection and privacy.

IEA has performed the required data transfer impact assessment for the transfer of personal data outside of the European Economic Area. The IEA relies on European Commission Standard Contractual Clauses (Module II: Controller-to-Processor transfers) in transferring the pseudonymized personal data to the USA. IEA has also concluded a data processing agreement with the ISC in Boston College.

The data are also reshared, again over secure SharePoint server, with the ERC.

For PIRLS 2026, the ISC in collaboration with IEA will implement AI-based automated scoring (AS) for a subset of constructed-response (CR) items in parallel with the human scoring conducted within each country/education system. The AI-based tool for language processing is provided by OpenAI, LLC. The ISC has obtained a formal GDPR-compliant Data Processing Addendum to their agreement with OpenAI. This is a contract that OpenAI will not use or store the data for model training or improvement. It offers clear terms for processing, access control, and data deletion in adherence with GDPR.

The OpenAI sub-processor is provided only with responses to the CR items, without any personally identifiable information (PII).

## **Related Data**

Along with the Early Learning Survey for parents/guardians and the Pupil Questionnaire, teachers and principals are also asked to complete a questionnaire. Information coming from these sources is linked to that from pupils in the final international research database (IDB).

## **Public Accessibility**

The final IDB will be accessible to the public from the following sites:

<https://www.iea.nl/index.php/data-tools/repository> (Hamburg, Germany)

<https://timssandpirls.bc.edu/index.html> (Boston, USA)

All data in the database are pseudonymous and, as such, cannot be linked to individuals without the use of additional information, which is kept separately, and its security is ensured by using appropriate technical and organisational measures.

## **Automated Decision-Making and Profiling**

No automated decision-making, including profiling, referred to in Article 22 GDPR is conducted.

## **Rights of Data Subjects**

The GDPR grants the following rights to you as a data subject:

- Right to withdraw consent, if processing is based on consent—Article 7 GDPR
- Right to Information—Articles 13 and 14 GDPR
- Right of Access—Article 15 GDPR

- Right to Rectification—Article 16 GDPR
- Right to Erasure—Article 17 GDPR
- Right to Restriction of Processing—Article 18 GDPR
- Right to Data Portability—Article 20 GDPR
- Right to Object—Article 21 GDPR
- The right not to be subjected to decisions only based on automated decision making of profiling—Article 22 GDPR
- Right to lodge a complaint with a supervisory authority—Article 77 GDPR

Data Subjects have the right to lodge a complaint with a supervisory authority. The relevant authority in Ireland is:

Data Protection Commission  
6 Pembroke Row  
Dublin 2  
D02 X963  
Website: [www.dataprotection.ie](http://www.dataprotection.ie)