

More Good Days At School: Building relationships to promote health, happiness and learning

How we use and protect your child's information

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This information sheet contains more details about how we'll use and protect your child's personal information if you agree for them to take part in our study.

When we (UCL and Anna Freud) collect and use participants' personal information as part of the study, we are the controllers of the personal information, which means we decide what personal information to collect and how it is used.

The UK GDPR basis for processing these data is legitimate interest (Article 6(1)(f)) and research purposes (Article 9(2)(j)) and DPA (2018) Schedule 1 part 1 paragraph 4. This allows us to process your child's personal data for research or evaluation purposes where appropriate care is taken to manage the data securely.

1. What will happen to my child's information after the project?

a) Information controlled by Anna Freud and UCL

Surveys, data from schools, and educational records

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After the project has ended (winter 2025), we will share the information we have gathered about everyone who has taken part with the Department for Education (DfE). This is so we can look at longer-term impacts on educational records. The DfE will replace all identifying information about the young people who have taken part in the study (their name, gender, date of birth) with the young person's unique Pupil Matching Reference number in the DfE's National Pupil Database. Once this has been done, it is no longer possible to identify any individual young person from the study data. This process is called pseudonymisation. Once this has been done, we (Anna Freud and UCL) will delete identifying information, except for consent forms.

Consent forms

Consent forms (with names on them) will be held as long as the data are held, so for at least 10 years (end of 2035). They will be held securely and separately from other information about you and your child.

Audio recordings

The information from audio recordings (if your child wants to meet with one of the researchers to talk about their experiences during the study) will be kept for no longer than 9 months. We will securely share this audio recording with another organisation (the Transcription Centre: (<https://www.transcriptioncentre.co.uk/>) who will write up the discussion into text (i.e., as a transcript). As soon as the audio recordings have been written up as text, the audio recording will be deleted and it will not be possible to identify your child from the write-up. Transcripts will be held for at least 10 years (end of 2035).

b) Information controlled by Youth Endowment Fund (YEF) (the project funder)

Once we (Anna Freud and UCL) have finished our study (winter 2025) and transfer the data to the DfE - described above in 1. a) - we hand over control to the YEF for protecting your personal information. The DfE will transfer the pseudonymised information to the YEF archive, which is stored in the Office for National Statistics' Secure Research Service. The YEF is the 'controller' of the information in the YEF archive. By maintaining the archive and allowing approved researchers to access the information in the archive, the YEF is performing a task in the public interest and this gives the YEF a lawful basis to use personal information.

The Secure Research Service is an extremely protected and controlled environment - it would be technically almost impossible (and also illegal) for anyone to link the information back to an individual person. For more information on the Office for National Statistics' Secure Research Service, you can visit their website:

<https://www.ons.gov.uk/aboutus/whatwedo/statistics/requestingstatistics/secureresearchservice>

Information in the YEF archive can only be used by approved researchers to explore whether “More Good Days At School: Building relationships to promote health, happiness and learning”, and other programmes funded by YEF, had an impact over a longer period of time. Using the unique Pupil Matching Reference numbers added to the data by the DfE, it will be possible to link the records held in the YEF archive to other public datasets such as education and criminal justice datasets. This will help approved researchers to find out the long-term impact of the projects funded by YEF because they'll be able to see, for example, whether being part of a project reduces a child's likelihood of being excluded from school or becoming involved in criminal activity.

The YEF will keep information in the YEF archive for as long as it is needed for research purposes. Data protection laws permit personal information to be kept for longer periods of time where it is necessary for research and archiving in the public interest and for statistical purposes. The YEF will carry out a review every 5 years to assess whether there is a continued benefit to storing the information in the archive, based on its potential use in future research.

Once information goes into the YEF archive it can no longer be deleted as that would affect the quality of the archived data for use in future research.

2. How is information in the YEF archive protected?

The YEF have put in place strong measures to protect the information in their archive. As well as the pseudonymisation process described in section 1, the YEF archive is protected by the Office for National Statistics' 'Five Safes' framework. The information can only be accessed by approved researchers in secure settings and there are strict restrictions about how the

information can be used. All proposals must be approved by an ethics panel. Information in the YEF archive cannot be used by law enforcement bodies or by the Home Office for immigration enforcement purposes.

You can find more information about the YEF archive and the ‘Five Safes’ at:

<https://youthendowmentfund.org.uk/wp-content/uploads/2021/07/YEF-Data-Guidance-Participants>

We encourage all parents and guardians to read YEF’s guidance for participants before deciding to take part in this study.

3. Will my child’s information be shared with anyone else?

In order to ensure that all our (Anna Freud and UCL) records are accurate, we will share information about which surveys (if any) are missing from your child with your child’s school. This is so the team can make sure that everything we need from your child has been completed. We will also be sharing a survey access code linked to your child’s name with your child’s school, and the school will share the survey access code with your child for the final survey. This is so that we can link your child’s responses to the final survey with the previous surveys. We will not share with the school, nor will anyone at the school be able to access, any of the information in your child’s surveys.

As part of the study, we are inviting your child to talk to a researcher about their experiences during the study. This will be audio recorded. If your child chooses to do this, we will let the school know so that they can seek consent from you. We will not share with the school, nor will anyone at the school be able to access, your child’s audio recording. The only time that we may have to break confidentiality is if they tell us something that makes us concerned about them or others being at risk. If this happens then we will try to discuss the issue with them first.

Your child’s audio recording will be shared with a company called the Transcription Centre (<https://www.transcriptioncentre.co.uk/>) for the purposes of writing up their spoken answers into words. There will be a data sharing agreement in place before they write-up the audio

recordings. We will make sure that they keep the data safe, in line with UK data protection law. When the recording has been written up, we will replace your child's name with a number and the recording will be deleted.

We will not share your child's data with any other external partners or agencies. Generally, we will ask for your and your child's permission before we share your child's data, but in some circumstances, we are legally obliged to share information, for example under a court order. When we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision-making.

We will not be transferring any identifiable information outside the European Economic Area (EEA). We will be managing the data on secure IT systems at Anna Freud, UCL, and the Office for National Statistics' Secure Research Service based in the UK, and we will be taking appropriate measures to ensure that it always remains secure.

4. Your data rights

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the Information Commissioner's website (<https://ico.org.uk/for-the-public/>) for more detail or contact us using the details below. Your rights are:

- The right to be informed
- The right of access
- The right to correct data
- The right to be forgotten
- The right to restrict processing
- The right to data portability
- The right to object to our processing

Please contact us at dpo@annafreud.org or data-protection@ucl.ac.uk if you wish to make a request with regard to any of your rights. You are not required to pay a charge for exercising your rights. We generally have one month within which to respond to your request.

You can find further information here from UCL's privacy policy (<https://www.ucl.ac.uk/legal-services/privacy>) and from UCL's general privacy notice for participants and researchers in health and care research studies (<https://www.ucl.ac.uk/legal-services/privacy/ucl-general-privacy-notice-participants-and-researchers-health-and-care-research-studies>).

If you want to exercise any of these rights after the study has finished (i.e., after the point when information has been shared with DfE), please contact the YEF. Further information and their contact details are available in YEF's guidance for participants at the link above.

When exercising any of these data rights, we may need to ask for more information from you to help us confirm your child's identity. This is a security measure to ensure that personal information is not shared with a person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

5. Who can I speak to if I have any questions?

If you feel that we may not be handling your child's data appropriately or if you have any queries or concerns about this, you can contact us at:

- Anna Freud: Rachel Hart is the information governance manager and can be contacted on: dpo@annafreud.org
- UCL: data-protection@ucl.ac.uk

You can also, at any time, make a complaint about our processing of your child's data to the Information Commissioner: <https://ico.org.uk/global/contact-us>.

Other contact details

You can find information and other contact details of each of the data controllers on their webpages:

- Anna Freud: <https://www.annafreud.org/>
- UCL: <https://www.ucl.ac.uk/evidence-based-practice-unit/evidence-based-practice-unit-0>

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- Youth Endowment Fund: <https://youthendowmentfund.org.uk/>

6. Obligation to provide data and automated decision-making

You and your child can choose not to participate in this study, in which case we do not require your child's data. We do not use profiling or automated decision-making when processing your child's data for any purpose.

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