

# What Works for Children's Social Care

## Privacy Notice for the 'Ministry of Defence Staff Inspiring the Next Generation Project' Evaluation

### Introduction

What Works for Children's Social Care and its affiliates, subsidiaries and related entities ("WWCSC", "we", "our") is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services ("you/your").

The purpose of this privacy notice is to explain what personal data we collect about you when we conduct research for the Ministry of Defence Staff Inspiring the Next Generation ("MOD-ING") evaluation project. When we do this, we are the data controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at [dpo@theevidencequarter.com](mailto:dpo@theevidencequarter.com) quoting "**Ministry of Defence Staff Inspiring the Next Generation Project**" or "**MOD-ING**" in the subject or body of the email.

### Personal data we collect

- Pseudonymised Identifier (provided to WWCSC by the MOD)
- Health data related to your well-being at work
- Your tenure (i.e. length of employment)
- Your number of sickness absence days
- Your gender
- Work-related data
- Behaviour related data
- Your turnover status (i.e. whether or not you have left the organisation over the course of the study)
- Any personal data voluntarily provided as an answer to an interview question
- Any personal data voluntarily provided as an answer within a survey free text capture filed

### How we collect information about you

We shall collect personal data in a variety of ways and at a variety of times throughout the research study being conducted. We refer to "primary data collection" when data is collected directly from you and we refer to "secondary data collection" when the data is not collected directly from you).

- From yourself via an online survey we have sent you (primary data collection)
- From yourself within an online interview with WWCSC researchers which will be recorded (primary data collection)
- From your organisation via individual-level administrative data sent to us stripped of any personal identifiers (secondary data collection)

## Purposes for which we use personal data and the legal basis

When conducting the research study, we may use your personal data for the following purposes and on the following lawful bases. The table below is relevant to all data subjects involved in the research study:

Purpose	Lawful Basis for Processing
To assess the potential of the project for creating positive working environments for public-sector employees.	Processing is necessary for the performance of a task carried out in the public interest.
To conduct the project evaluation based on the data you have provided.	
To allow the MOD to identify your administrative data to be shared with WWCSA for the purposes of the evaluation.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.
For the MOD to contact you to participate in an interview as part of the evaluation (not all participants will be contacted).	
To transcribe the audio captured from any recorded interviews we have with you (not all participants will be interviewed).	
To match data collected via a survey with administrative data passed to WWCSA by the MOD.	
To identify whether you have agreed to participate in the survey.	
To identify your data, which would be deleted where possible, should you no longer agree to have your data processed for the purpose of conducting the evaluation.	
To gather your insights regarding the effectiveness of the project within a recorded interview which shall be used to improve any subsequent and similar projects to the one you have been a part of.	

<p>To be pseudonymised so data can be put into an archive database for it to inform further research and secondary studies for the betterment of society. (At this point the data could no longer be deleted.)</p>	<p>Archiving is for societal benefit and therefore processing is necessary for the performance of a task carried out in the public interest, also known as “public task” under UK GDPR Article 6.1(e).</p>
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## Sharing your data

The MOD will share pseudonymised data with WWCS in order for WWCS to align the survey links and WWCS will share these links with the MOD who will send the surveys to their staff. The MOD never shares the key to identify their member of staff with WWCS.

WWCS captures the data from their survey platform and aligns the outcome answers to the pseudonymised ID originally provided by the MOD. WWCS will conduct their evaluation based on the answers captured via the survey although the answers will never be shared with the MOD on an individual basis. Only the outcome of the evaluation as a whole shall be shared publicly and with the MOD. There will be no individual survey answers, or any data captured via an interview, outside of anonymised quotations, shared with the MOD or publicly.

This project has been subject to two ethics board approvals these include MOD Research Ethics Committee and the University of East Anglia Research Ethics Committee although no project data outside of the publicly available outcome report, which does not contain any personal data, shall be shared with either.

It is unlikely that we'll ever share your personal data outside the UK. If, however, it becomes necessary for the purposes of conducting our research we will only share it with organisations in countries benefiting from a European Commission adequacy decision or on the basis of Standard Contractual Clauses approved by the European Commission (both of which are recognised by the UK) which contractually oblige the recipient to process and protect your personal data to the standard expected within the UK.

Any data shared with the below categories of recipients is the minimum necessary for the task they have been instructed to carry out on our behalf or in conjunction with us. Each category of recipient is subject to pre-approved review to ensure comparative technical and organisational measure for keeping the data secure.

1. Pre-approved transcription vendors.
2. Pre-approved online survey platform providers.
3. Archiving location within the Office of National Statistics 'Secure Research Service'

The anonymised research data shall be transferred to our secure data archive. This archive is hosted and stored by the Office of National Statistics 'Secure Research Service' (“ONS SRS”) on our behalf, we are the data controller and access to any data stored within the archive is controlled by the ONS and WWCS only. The duration of retention is indefinite. Further information on how the ONS SRS keep data secure can be found by following this [link](#).

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies or public

authorities in order to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

We may also share your personal data if we choose to sell, transfer, or merge parts of our business and/or group, or our assets in the future. Or we may seek to acquire other businesses or merge with them. During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private. If a change to our group happens, then other parties may use your data in the same way as set out in this notice.

## **How long we keep your data**

Transcription vendors are instructed to confirm deletion of interview recordings and any copies of transcriptions of interviews within 7 days of delivery of the transcription to WWCS.

WWCS shall delete all associated Personal Data approximately 24 months after the delivery of the final report. The agreed final date for WWCS's deletion of all personal data used in the evaluation and research shall be 30 December 2024.

WWCS shall retain the results data in an anonymous form by deleting the randomised pseudonymous ID provided by MOD-DI.

WWCS shall become sole controller of the anonymised data which shall be held indefinitely within the ONS SRS database for further research to be conducted for the benefit of society as a whole. All data held on the ONS SRS is subject to rigorous quality assurance, de-identification and access certification processes in accordance with the requirements of the Digital Economy Act 2017.

## **How we protect your data**

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction. Data protection assessments are conducted for each research project and all recipients of data used within any research data.

Your information is securely stored on a dedicated drive, and access is controlled by WWCS's secure access policy for the duration of the research study period.

We will always keep these under review to make sure that the measures we have implemented remain appropriate.

Any personal data is not subject to any automated decision-making.

## **Your rights and options**

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.

- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal information because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so.
- You can ask us to restrict the use of your personal data if:
  - It is not accurate,
  - It has been used unlawfully but you do not want us to delete it,
  - We do not need it any-more, but you want us to keep it for use in legal claims, or
  - if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data and request a machine-readable copy of your personal data to transfer to another service provider.
- You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, please contact us at [dpo@whatworks-csc.org.uk](mailto:dpo@whatworks-csc.org.uk).

## How to Complain

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://ico.org.uk/concerns/>.

## Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact:

Project: **Ministry of Defence Staff Inspiring the Next Generation Project**  
Organisation: What Works for Children's Social Care  
Address: The Evidence Quarter, Albany House, Westminster, SW1H 9EA

Alternatively, you can email us at [dpo@whatworks-csc.org.uk](mailto:dpo@whatworks-csc.org.uk)

## **Changes to this privacy notice**

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify you of the changes where required by applicable law to do so.

Last modified Wednesday 3 June, 2021.