

What Works for Children's Social Care Privacy Notice for Stakeholder within the "Kinship Care & Special Guardianship Orders" Project

1. Introduction

What Works for Children's Social Care ("WWCSC", "we", "our") is committed to protecting the privacy and security of the personal data we collect about evaluation participants ("you/your").

The purpose of this privacy notice is to explain what personal data we collect about you when we conduct research for the *Kinship Care & Special Guardianship Orders* project ("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 quoting "*Kinship Care & Special Guardianship Orders*" or "#3035" in the subject or body of the email.

2. Personal data we will collect

- Your name
- Your email address
- Your telephone number
- Your place of work
- Your occupation/job title
- The council borough in which you work (may be the same as your place of work)
- Recorded interview answers that will be transcribed

3. How we will collect information about you

- From yourself when you volunteer via email to us to take part in an interview
- From yourself within an online/telephone interview
- From yourself within any further correspondence we have with you

4. Purposes for which we use personal data and the legal basis

When conducting the Project, 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:

4.1 Purpose	4.2 Lawful Basis for Processing
To gain information from you about <i>Kinship Care & Special Guardianship</i>	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.

Orders within the Local Authority you represent/work for/are associated with.	
To understand your interest in volunteering to participate and possibly send you an anonymous survey link and send you an invitation to take part in an interview with you which will be transcribed.	
To identify your data and take relevant action should you submit a data subject rights request.	The lawful basis we shall be relying on is for the compliance with a legal obligation. The legal obligation is the UK General Data Protection Regulation to uphold your data protection rights.
For WWCS to contact you to ask if you would like to participate in any new projects as a participant where we think you may be a stakeholder / Subject Matter Expert relevant to the topic area of a new project (you can opt out anytime).	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.

5. Sharing your data

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 UK or European Commission adequacy decision, or on the basis of International Data transfer Agreements, European Commission Standard Contractual Clauses with a UK required addendum (both of which are recognised by the UK) which contractually obliges 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. Digital communications and cloud storage service providers (Gmail, Zoom, Teams etc.)
2. Pre-approved transcription vendors.

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. This relates to any instance where the organisation (WWCSC) merges or gets acquired by another organisation, and all documents including any personal data change ownership (organisational ownership).

6. How long we keep your data

We shall keep your personal data up to 24 months after the end of the research study in case we need to reach out to you again about this Project or if a problem occurs after the Project is complete.

From interactions with you we may identify you as someone we would like to contact in the future for another project we are undertaking for societal benefit. If we do identify you as a potential future stakeholder we will keep your personal data on file indefinitely unless you tell us otherwise. We will not re-use your personal data for any other reason than to make contact about further research in which we feel you may be a knowledgeable stakeholder.

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 WWCSC.

7. 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 risk 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 WWCSC's secure access policy for the duration of the Project period.

Once your personal data has been used it will be removed from the information we have captured from you therefore rendering the data de-identified and/or anonymous. It may not be completely anonymous due to the uniqueness of your job title when associated with a Local Authority although if we suspect there is a clear possibility of identifying you we will update your job title within the information to be more generic and therefore less identifiable.

For any interviews with you we have recorded we shall delete the recording once we have had the interviews transcribed by a trusted partner. The partner is instructed to delete the recordings 7 days after successfully completing and sharing the transcript with us.

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.

8. 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.
- We never use your personal data for direct marketing, including profiling for direct marketing purposes. If an organisation does so you can object to this use of your data.
- 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.

9. 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/>.

Please make contact with us before launching any complaints with the ICO as we would like the opportunity to resolve the matter with you as best we can.

10. Contact us

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

Project: Kinship Care & Special Guardianship Orders

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

11. 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 17 January 2023.