

What Works for Children's Social Care

Privacy Notice for the "Putting Kitbags to Work" 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 *Putting Kitbags to Work* 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@whatworks-csc.org.uk quoting "*Putting Kitbags to Work*" in the subject or body of the email.

Personal data we collect

We shall be processing the data of several categories of data subject. Please read the section below that is relevant to you:

Children / young people

- Your date of birth
- Your gender
- Your ethnicity
- Whether you have a disability
- Whether you are an unaccompanied asylum seeker
- Information relating to your behaviour including observed behaviour
- Your interactions with Children's Social Care services
- Pseudonymised Kitbag recording notes

Social workers / family support workers

- Your email address (optional)
- Your place of work
- Your occupation
- Your sense of self-efficacy
- Information relating to your level of stress
- Number of days you've been absent due to illness
- Information within interview recordings
- Information relating to yourself within Kitbag recording notes

Foster carers/ kinship carers

- Your email address (optional)

- Gender
- Number of years experience
- Your sense of self-efficacy
- Information within interview recordings
- Information relating to yourself within Kitbag recording notes

How we collect information about you

We may 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) Please read the section below that is relevant to you:

Children / young people

- From a social worker
- From local authority partners:
 - London Borough of Bexley
 - London borough of Haringey
 - Oxfordshire County Council
 - Warwickshire County Council
- From yourself within a telephone/video interview with WWCS (primary data collection)

Social workers / family support workers

- From yourself within an online/telephone interview, with WWCS (primary data collection)
- From yourself via an online survey we have sent you (primary data collection)
- From local authority partners (secondary data collection):
 - London Borough of Bexley
 - London borough of Haringey
 - Oxfordshire County Council
 - Warwickshire County Council
- Through observation of a workshop you are attending (anonymised data)

In-house Foster carers

- From yourself via an online survey we have sent you (primary data collection)
- From local authority partners (secondary data collection):
 - London Borough of Bexley
 - London borough of Haringey
 - Oxfordshire County Council
 - Warwickshire County Council
- From yourself within a telephone/video interview with WWCS (primary 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 develop evidence of the level of effectiveness of Kitbags as a way to improve support for children who have experienced trauma or transitions.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller for societal benefit.
To develop evidence on whether Kitbags are effective in helping to develop socially and emotionally literate relationships between children/young people, professionals, and carers.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller for societal benefit.
To process special category namely ethnicity and health (disability status) within the research conducted.	The legal basis for processing this special category data is for archiving, research and statistical purposes.
To collect and use your data collected via primary data collection within the research.	<p>The data subject has given their informed consent to the processing of their data. This constitutes ethical consent for participation in the research study and consent for the processing of their personal data as part of the study.</p> <p>Should consent be withdrawn, and the analysis phase of the research study <u>not</u> be underway, all data collected at the primary and secondary data collection points shall be deleted.</p> <p>If the analysis phase is underway any deletion of data at this stage may have a detrimental effect on the research being carried out and also affect subsequent or replicable studies on the data which would be pseudonymised. The lawful basis we shall be relying on is the legitimate interest of the Data Controller for societal benefit for the processing of this data once the analysis phase has started although</p>

	<p>personal data shall be reduced and de-identified where possible.</p>
<p>To collect your data collected via secondary data collection within the research.</p>	<p>This subsequent collection of information is not directly from a data subject. We rely on our legitimate interest as a data controller to collect and analyse this data as part of the research study. We shall match this data with the data from the primary data collection points.</p> <p>Should consent be withdrawn for the primary data collection activities, and the analysis phase of the research study <u>not</u> be underway, we will match this data with the secondary data collected and delete this data.</p> <p>If the analysis phase is underway any deletion of data at this stage may have a detrimental effect on the research being carried out and also affect subsequent or replicable studies on the data which would be pseudonymised. The lawful basis we shall be relying on is the legitimate interest of the Data Controller for societal benefit for the processing of this data once the analysis phase has started although personal data shall be reduced and de-identified where possible.</p>
<p>To conduct and record interviews to be conducted over telephone or video-based platforms.</p>	<p>We shall ask for your consent to conduct and record a telephone interview relevant to the research study.</p>
<p>To transcribe the recordings of interviews conducted over telephone or video-based platforms.</p>	<p>We will rely on the lawful basis of legitimate interest to have interview recordings transcribed by ourselves or an approved transcription vendor.</p>
<p>To analyse the data collected via the telephone or video-based interview within the research study.</p>	<p>Upon collection of the interview data, we shall rely on it being within our legitimate interest to analyse the data recorded. Should there be an objection to the use of the data within the recording, unless the data is in the analysis phase of the research, we shall delete the recording any associated data on your behalf.</p>

<p>To pseudonymise and archive data collected within a central national database with the Office of National Statistics.</p>	<p>We shall rely on the legitimate interest as our lawful basis to pseudonymise personal data before it is added to any archive. This will include reducing the amount of data to be de-identifiable yet still useful for any subsequent research we may conduct.</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>
<p>To be able to enter you in a prize draw for a voucher for your participation in the survey. (Email Address only which is not used as part of the survey and is separated from the survey data upon extraction from the survey platform.)</p>	<p>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.</p>

Sharing your data

We will not share your personal data outside the UK.

Any data shared with the below categories of recipients is the minimal 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 (“ONS”) ‘Secure Research Service’

As with our other projects, we anticipate that the pseudonymised research data (all data other than name and contact details) shall be transferred to our secure data archive. This archive is hosted and stored by the Office of National Statistics (“ONS”) ‘Secure Research Service’ on our behalf, we are the data controller and access to any data stored within the archive is controlled by the ONS and WWCSC 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

Data shall be reduced, redacted, de-identified and deleted at appropriate times so we remain the minimum amount of data possible throughout the research study.

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.

Primary data collected and held by research partners is held for 12 months after the final point of collection in line with the requirements of ISO 20252 (The International Standard for Market and Social Research).

Data collected for the purposes of being entered into an internal prize will be deleted once the competition has finished and will not be retained for any period longer than needed for the prize to be delivered.

Archived data within the ONS SRS shall remain in a pseudonymised form within the archive for an indefinite period of time.

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 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:
 - o It is not accurate,
 - o It has been used unlawfully but you do not want us to delete it,
 - o We do not need it any-more, but you want us to keep it for use in legal claims, or
 - o 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.

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: Putting Kitbags to Work
Organisation: What Works for Children's Social Care
Address: The Evidence Quarter, Albany House, Westminster, SW1H 9EA
Phone: 07583 146982
E-mail: kitbag@whatworks-csc.org.uk

Alternatively, you can email us at 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 of the changes where required by applicable law to do so.

Last modified 23rd April 2021.