

Privacy Notice for the Headstart Evaluation

This notice informs you how we may use the personal data we collect about children and young people participating in the Headstart programme.

1. What is HeadStart?

HeadStart is a 7-year programme funded by The National Lottery Community Fund (TNLCF) which aims to improve the mental wellbeing and resilience of 10-16 year olds by investing in 6 local authorities or partnerships across England to implement a suite of interventions in school and community settings. HeadStart has three specific outcomes: 1) To improve young people's resilience by giving them the support and skills to cope with adversity and do well in school and life; 2) To demonstrate that investing in mental health promotion and prevention can bring savings for the public purse and for society; 3) To build an evidence base for service redesign.

2. Who are we?

The TNLCF have funded the Evidence Based Practice Unit (EBPU) to lead the evaluation of HeadStart. EBPU is a child and youth mental health research and innovation unit founded in 2006 as a collaboration between UCL Faculty of Brain Sciences and Anna Freud National Centre for Children and Families.

EBPU leads a consortium of organisations who work together in the evaluation of HeadStart on behalf of the TNLCF, who is the Data Controller for this research.

The Headstart consortium members named below are Data Processors of your data. Address and contact details here:

- **Evidence Based Practice Unit (EBPU):**
Dr Polly Casey, Anna Freud National Centre for Children and Families,
Jordan House, 4-8 Rodney Street, London N1 9JH.
Headstart@annafreud.org
020 7794 2313
- **Manchester Institute of Education, University of Manchester**
Lawrence Wo, School of Education, B4.10 Ellen Wilkinson Building,
University of Manchester, Oxford Road, Manchester, M13 9PL
0161 275 3415
headstart@manchester.ac.uk.

3. What personal data do we collect about young people involved in the HeadStart evaluation?

Personal data, or personal information, means any information about or relating to an individual from which that person could be identified. It does not include data where the identity has been removed (anonymous data).

The aim of the of this research is to investigate changes and development in young people's mental health and wellbeing over time and the factors that predict this, with a specific emphasis on interventions implemented to foster resilience, improve wellbeing and prevent mental health problems. In order to do this, each year we ask young people in HeadStart schools to complete an online survey called the Wellbeing Measurement Framework (WMF). The WMF asks them questions about how they feel about their school, friends, and themselves.

We may collect, use, store and transfer different kinds of personal data about pupils who complete the WMF. This may include :

Type of data	Source	Use
Pupil name (forename and surname), unique pupil number (UPN) gender, date of birth, school name and year group	National Pupil Database (DfE)	To create unique passwords for each pupil taking part in the Wellbeing Measurement Framework survey. Passwords are used by pupils to log in to the online WMF, and mean that we can link their survey data to other sources of data detailed below, and over time.
Ethnicity, English as an additional language (EAL), special education needs (SEN), free school meal eligibility (FSM), child looked-after status (CLA), child in need status (CIN), income deprivation affecting children index (IDACI), attainment, attendance, exclusions	National Pupil Database (DfE)	To understand more about different characteristics of young people completing the survey and understand whether support provided to children and young people help them feel better.
Wellbeing Measurement Framework survey data	Completed by young people online, held by the University of Manchester	To understand more about young people's mental health and wellbeing, to investigate changes and development over time, the factors that predict this and the impact of HeadStart support
Name of any HeadStart support received (e.g. peer mentoring, 1:1 counselling) since the programme began in the 2016/17 academic year. First contact date with the service Last contact date with the service Number of sessions the child/YP attended Reason for intervention ending	Individual local authorities in HeadStart areas	To provide the research team with information about support received, dosage and type as part of the HeadStart research project. Using this, we can understand more about different groups of young people completing the questionnaire and understand whether HeadStart support they may have received helped to make them feel better.

4. Who will we share the personal data with?

Your child's identifiable personal data will be collected and processed by our data manager at the University of Manchester, one of the research consortium members involved in the evaluation of HeadStart.

We will share pseudonymised Wellbeing Measurement Framework survey data with your Local Authority. This means that survey data will be shared with your Local Authority along with a unique identifier, called a Unique Pupil Number (UPN). With these data they can carry out their own analysis on the aggregated dataset (groups of young people) and link survey data to other datasets that they might hold, **they will not use these data to identify individual young people.**

We require all data recipients to respect the security of your personal data and to treat it in accordance with the law and use it only for the stated purpose(s).

In some circumstances we are legally obliged to share information, for example under a court order. Where we do share we satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

What is our lawful basis for processing personal data?

Our lawful bases for processing these data, as set out in the General Data Protection Regulation (GDPR), are

- **Article 6(1)(e)** "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller": We are conducting research which will help to establish which mental health support is most effective for young people, information which will be used for wider public benefit.
- **Article 9(2)(j), Sched 1 Part 1 of the Data Protection Act (DPA) 2018** "processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.": This basis is what we rely upon to process Special Category data about you, such as your ethnicity or whether you have received any kind of help related to mental health difficulties.

5. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

6. How do we keep the data secure?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach.

7. How long do we keep personal data for?

Your data is held during the term of the evaluation, which is seven years. At that point the original identifiable research data will be securely disposed of though we may use a completely anonymised version of the data, from which no one individual will be identifiable, for further research activity.

8. What are your rights?

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

- **Your right of access**

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. You can read more about this right [here](#).

- **Your right to rectification**

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can read more about this right [here](#).

- **Your right to erasure**

You have the right to ask us to erase your personal information in certain circumstances. You can read more about this right [here](#).

- **Your right to restriction of processing**

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this right **here**.

- **Your right to object to processing**

You have the right to object to processing of your data. You can read more about this right **here**.

- **Your right to data portability**

This only applies to information you have given us and where we rely upon your consent to process the data, so does not apply in this case. You can read more about this right **here**.

You are not required to pay any charge for exercising your rights. We have one month to respond to your request.

Please contact us at DPO@annafreud.org if you wish to make a request with regard to any of your rights.

You can read more about these rights on the Information Commissioner's website: <https://ico.org.uk/your-data-matters/>

9. Ethical consent

In addition to these data protection rights we also consider your **ethical rights**.

This evaluation has been approved by the University College London (UCL) Research Ethics Committee and as part of that approval process we are required to have your consent for your child's participation in this evaluation. This is the opt-out consent that we ask for in the information letter that your school will have given you.

Ethical governance is designed to protect the dignity, rights, safety and wellbeing of research participants. For example, we must seek to inform parents about whether any part of the research process is potentially harmful to young people, or whether any of the questionnaires might be upsetting or embarrassing for young people if they take part. Your consent is sought on the basis of this information and aspect of the research.

Ethical consent does not refer to the **processing** of your child's data- a separate aspect of the research- and therefore doesn't fall under the remit of GDPR. This is why we can ask for opt-out consent.

If you or your child want to withdraw from the evaluation at any time we will respect that decision and cease to use your data. You can contact us using the contact details included below to make such a request.

10. Contacting us

If you have any questions about the content of this notice you can contact us at:

Dr Polly Casey:

- Anna Freud National Centre for Children and Families, 4-8 Rodney Street, London N1 9JH.
- Headstart@annafreud.org
- 020 7794 2313

Our Data Protection Officer is Susan Henry:

- DPO@annafreud.org
- 020 7794 2313

11. How can you make a complaint?

If you feel we may not be handling your data appropriately or if you have any queries or concerns about this you can contact us, dpo@annafreud.org.

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