

# Data Protection Notice for Classroom Wellbeing Toolkit Feedback (P.123b)

## 1. Introduction

The [Early Intervention Foundation](#) (“EIF”, “we”, “our”) is collecting feedback on the Classroom Wellbeing Toolkit that we have produced in collaboration with the Anna Freud Centre (the ‘Project’).

The Classroom Wellbeing Toolkit is available for free on [www.AnnaFreud.org/classroom-wellbeing-toolkit](http://www.AnnaFreud.org/classroom-wellbeing-toolkit). The toolkit is designed for secondary school teachers without specialist mental health training. The toolkit provides practical advice on how teachers can support students’ mental health through daily interactions. The toolkit translates insights from a recent evidence review into tangible advice. The toolkit was co-produced with teachers and young people.

We seek feedback on the usability and design of the toolkit. It is likely you are being made aware of this privacy notice through your voluntary participation in the project or at the point you are deciding to volunteer to participate.

The purpose of this privacy notice is to explain what personal data we collect directly from you when conducting our research for the Project. When we do this work, we are the data controller.

Before you take part in this project, you will be asked to give your permission to participate. You are also able to remove your permission at any time. If you do decide you no longer wish to participate, let us know as soon as you can. We will remove your personal data from any locations we hold your data and delete any information you have provided to us. We will do this as soon as we can. If the analysis of the information has already progressed to a point we can no longer remove your data, we will ensure all identifiable data is removed from our records when the analysis is complete. We will inform you what action we were able to take.

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 [datasecurity@eif.org.uk](mailto:datasecurity@eif.org.uk) please quote P123b in the subject line or text body.

## 2. Personal data we collect

Personal data is any information that relates to a person (a ‘data subject’) which can be identified either directly or indirectly.

For this Project, we shall be processing the data from Classroom Wellbeing Toolkit users. The types of personal data we will collect are listed below:

- Your name and email address and job role, if you opt to provide these
- Free Text fields where you may volunteer information that could identify you
- Your IP address

## 3. How we collect information about you

We will collect your data directly from you. You may provide this information to us through completing the survey.

We may collect personal data in a variety of ways and at a variety of times throughout the research study being conducted. The ways in which we collect your personal data for this Project include:

- From yourself via a survey (primary data collection)

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

We may use your personal data for the following purposes and on the following lawful bases.

4.1 Purpose	4.2 Lawful Basis for Processing
To conduct the Project based on the data you have provided.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.
For the goal of the Project which is to understand the usability of the Classroom Wellbeing Toolkit.	
For EIF and its processors to analyse the information you have voluntarily provided via the survey	
For the Research Team to contact you to participate in an interview or focus group if you choose to be contacted for this purpose.	The lawful basis we shall be relying on is consent.

## 5. Sharing your data

EIF's Survey Platform, Survey Monkey, acts as our data processor and uses servers in the United States of America, European Union and Australia. We have entered into the relevant legal mechanism for cross-border transfers outside the UK and EEA. We download and delete all data from the survey platform when the Project is complete. Once downloaded, we will not share your personal data outside the United Kingdom (UK) or EEA.

No other processors process your data outside the UK or EEA.

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 online survey platform providers
2. Secure Cloud Storage Providers

EIF will not disclose your identity to any other parties unless you have instructed us to do so or given your permission for us to disclose your personal data. There may be times where we have a legal obligation to disclose or share your personal data. This could include sharing your data with law enforcement agencies, regulatory bodies, or public authorities to prevent or detect crime or report a safeguarding concern. 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 (EIF) merges with 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 will take steps to ensure we only keep the minimum amount of data possible throughout the Project. We shall keep your information for 2 years after the launch of the Classroom Wellbeing Toolkit.

We will delete your contact details when you tell us you want to be removed from our contact list, or when you haven't engaged with us for a reasonable amount of time. We will view our contacts list on an annual basis.

All processors working on behalf of EIF will delete their data in line with or before the dates outlined above.

## 7. How we protect your data

There are appropriate technical and organisational measures in place to protect data that we process from unauthorised disclosure, use, alteration, or destruction. We conduct data protection assessments for each research project we conduct.

We hold your information on password protected secure dedicated drives on an encrypted laptop and secure cloud backup server. Access is controlled by EIF's information security policy, password policy and Data Protection policy respectively. Any information you provide to us will be treated in the strictest confidence unless of course, it relates to a child protection or safeguarding issue.

Any summary of feedback received will only include anonymised data.

EIF will always keep our Confidentiality and Data Protection policies under review to make sure that the measures we have implemented remain appropriate.

## 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. 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,
  - 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.

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 [datasecurity@eif.org.uk](mailto:datasecurity@eif.org.uk).

## 9. How to Complain

In the first instance, you may register a complaint with us directly. Please contact [datasecurity@eif.org.uk](mailto:datasecurity@eif.org.uk), quoting the project title in the subject line. 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/>.

## 10. Contact us

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

Project: 123b  
Organisation: Early Intervention Foundation  
Address: The Evidence Quarter, Albany House, Westminster, SW1H 9EA  
Alternatively, you can email us at [datasecurity@eif.org.uk](mailto:datasecurity@eif.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 12 October 2022