

Early Intervention Foundation

Privacy Notice for the “Virtual and Digital Review Update 2022” research

1. Introduction

The Early Intervention Foundation (“EIF”, “we”, “our”) are conducting an update on EIF’s 2020 report into the [‘Evidence, challenges, and risks relating to virtual and digital delivery’](#). This work aims to update the evidence for the effective use of virtual and digital components in the delivery of services and interventions, identifying research that has been published in the previous two years during the Covid-19 pandemic. A core element of this work involves mapping the existing use of virtual and digital components across local areas and in intervention programmes in addition to investigating the challenges posed by the use of virtual and digital components and strategies used to overcome these. Please note, EIF is collaborating with the Anna Freud Centre (“AFC”) to disseminate a survey as a part of this project, however at no point will the two organisations share the personal data of data subjects held by each organisation independent of the other.

EIF is committed to protecting the privacy and security of the personal data we collect about our research participants (“you/your”). The purpose of this privacy notice is to explain what personal data we collect about you when we conduct research for this project.

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. We may anonymise your data before we begin our analysis activities meaning we would not be able to identify you from the data we have, shortly after you have supplied your information to us. 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 quoting “Virtual & Digital Review Update 2022” in the subject or body of the email.

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 different categories of data subjects (people). These are intervention providers and practitioners or service providers working in local areas or Family Hubs. The types of personal data we will collect and process are listed below:

- Your name (optional)
- Your email (optional)
- Your place of work
- Your occupation

3. How we collect information about you

For this project, we collect personal data only directly from you. 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). The ways in which we collect your personal data for this Project include:

- From yourself when you have accepted to participate in the project via an online survey (primary data collection)

4. 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:

4.1 Purpose	4.2 Lawful Basis for Processing
To conduct the Project based on the data you have provided on virtual and digital aspects in intervention programmes.	Processing is necessary for the performance of a task carried out in the public interest.
To collect ethical informed consent for participation in the research (you are able to withdraw this consent at any time and where possible the Collaborators will delete your data).	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.
To make further contact with you to clarify or expand upon something you commented upon in the survey which is of particular relevance to this research.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.
To identify your data, which would be deleted where possible, should you no longer agree to have your data processed for the purpose of producing the Guidance.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.
For EIF to contact you to ask if you would like to participate in any new projects as a participant (you can opt out anytime), or if your Local Area/Family Hub would have any interest in participating in another project.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.

5. Sharing your data

Your personal data will be processed in the United Kingdom (UK), for the survey only your data may be processed 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. In this case we have entered into a contract that concludes prior to September 2022 and relies on statutory contractual clauses.

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. Online Survey Platform Providers
2. Contacts database management system (professional information only)

3. Secure Cloud Storage Providers
4. Secure Email Service Providers

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 (EIF) 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

Data shall be reduced, redacted, de-identified and deleted at appropriate times so we retain the minimum amount of data possible throughout the Project. Where we need to retain your personal data for the purposes of subsequent Project reviews or analysis, we shall keep your information for 2 years after the final date of completion of the Guidance. The delivery of the report is currently scheduled for the end 2022.

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.

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.

The Research Team hold your information on password protected secure dedicated drives on an encrypted laptop and secure cloud backup server. Access is controlled by EIF's secure access policy and Confidentiality and Data Protection policy respectively.

The final report will not contain any personal data unless you have granted express permission to us to be identified by name. This may include using quotes or other references to yourself. Without having this permission in place pseudonyms will be used, and you will not be identified by the way you speak or the things you say. .

EIF will always keep these 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

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/>.

10. Contact us

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

Project: "Virtual and Digital Review Update 2022 - Research"
Organisation: Early Intervention Foundation
Address: The Evidence Quarter, Albany House, Westminster, SW1H 9EA

Alternatively, you can email us at 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 21 June 2022.