

# Data privacy notice for the EXODUS research

This is a data privacy notice for the EXODUS research. This is for young people and their parents and carers to read when considering if they want to take part in the research.

<u>Coram</u> who lead the research, <u>UpskillU</u> who deliver EXODUS and the <u>Youth Endowment Fund</u> who fund the research ("we", "us", "our") are committed to protecting the privacy and security of the personal data we collect about our participants ("you/your").

As required by law, the purpose of this data privacy notice (DPN) is to explain what personal data we collect about you (young people aged 11 to 17 years old who take part in the research) when we conduct the evaluation of EXODUS ("the evaluation").

When we do this, we are the data controller.

Please read this DPN carefully. It provides important information about your rights and how we handle your personal information.

This DPN should be read with the EXODUS research information sheet and consent form.

## How we collect information about you

We will collect personal data in a variety of ways and at a variety of times throughout the research.

We refer to "direct data collection" when data is collected directly from you. We refer to "indirect data collection" when the data is not collected directly from you. This data may include:

- Data shared with to Coram from UpskillU or your local youth offending service (indirect data collection)
- Data from yourself in an in person, online (video) or telephone interview with a Coram researcher if you agree to take part (direct data collection)

#### Indirect data collection

If you decide to take part in the research, we will collect indirect data about you from UpskillU and local youth offending service and/or police team. UpskillU and your local youth offending service and police team use this data as regular part of their work. We make the data we are using within the evaluation

**pseudonymised** (meaning your name is not used and is replaced by a unique ID number). We will not be able to identify you when we do our analysis.

The personal data we will **indirectly** collect about young people who consent to take part in the research is:

- Your first and last name
- Your postcode
- Your date of birth and age
- Your gender and ethnicity
- The main language you speak (and any second languages)
- Whether you are a migrant or refugee
- Whether you have any mental health problems
- Whether you have any special educational needs or disabilities and if you have an Education
  Health and Care Plan (EHCP) to support with this
- Whether you are eligible for free school meals
- If you are or ever have been in care, or receive any support from your local authority's children's services (like being on a Child in Need Plan or a Child Protection Plan)
- If you are receiving any support from Child and Adolescent Mental Health Services (CAHMS), the Child Criminal Exploitation (CCE) team, the Child Sexual Exploitation (CSE) team or the Behaviour Support Service
- The main reason you have been referred to EXODUS
- Whether you are known to be currently offending
- Whether you are have high, medium or low risk factors associated with offending, exploitation,
  and/or victimisation and your level of risk of causing serious harmful behaviour in the future
- If you are currently in or leaving custody
- Any risks to your safety and wellbeing.

#### We will also receive some indirect data about your parent or carer. This is:

- The first and last names of your parent or carer
- Their parental responsibility status (e.g. mum, dad, foster carer)
- The parent or carer's main language (and any second languages they speak).

#### **Direct data collection**

Direct data collection only applies if you agree to take part in an interview or a focus group discussion with a Coram researcher. There is a separate information and consent form for this, which we will provide later in

the research. If you take part in an interview or a focus group, you will be providing direct data. You may talk about sensitive information if you choose to. Taking part in an interview or focus group discussion is voluntary. We will use another external organisation to transcribe your interview. This means we will send another organisation the audio or video recording of your interview and they write everything you have said into text. We would only do this with your consent.

# Purposes for which we use personal information and the lawful basis

Some of the data above is **special category data**. We will process your data under these lawful bases:

- Personal data will be processed under the basis of Public Task under UK General Data Protection Regulation Article 6.1(e)
- 2. Special category personal data being processed for research purposes is under GDPR Article 9.2(j) and DPA18 Schedule 1 Part 1.4(a), (b)&(c) for special category data including data considered to be a protected characteristic under the UK Equality Act 2010.

## **Sharing your data**

We will not share your personal data outside of the UK. There may be scenarios where we have a legal obligation to disclose or share your personal data, for safeguarding reasons, as required by law, if we believed you or someone you mention is at risk of harm (for example they were going to be attacked). We will only ever disclose your personal data to these third parties to the extent we are required to do so by law. In the very rare occasion this might happen, the researcher would always aim to talk to you about what information would be shared as well as how and when they are going to share this with others.

#### How long we keep your data

We will keep your personal information for the least amount of time necessary and reduce the amount of personal information to the minimum required. Where there may be a need to revisit this research we keep your personal information for a further period of 2 years before secure deletion of your personal information.

The final report will be published in 2028. We will keep your data for 2 years after the report is published.

## **Archiving your data**

At the end of the research study some of your data (your name, gender and date of birth) will be archived by the Youth Endowment Fund (the funder), who will become the data controller. The Youth Endowment Fund wants to know whether taking part in the research study prevents children from being involved in crime and violence as they grow older. To do this, the Youth Endowment Fund will keep information about the young people who have taken part in an archive so that more research can be done in the future. Once it is transferred it will be permanently deleted from Coram's data storage systems.

To archive your data the **Department for Education**<sup>1</sup> will match this data to your Pupil Matching Reference number and then pseudonymised it - meaning your name and personal information identifying you are removed. From this point on, it will no longer be possible to identify you from the information. The pseudonymised data will be linked to other data collected during the research study as well as data held by the **Department for Education** and **Ministry of Justice**<sup>2</sup> and held in the Youth Endowment Fund's secure archive with the **Office for National Statistics**<sup>3</sup> and held indefinitely under the basis of **Public Task** under UK General Data Protection Regulation Article 6.1(e). This will make it possible to carry out research into the long-term impact that the projects funded by the Youth Endowment Fund have on reducing children and young people's involvement in crime. The youth Endowment Fund will only allow information to be used for research in accordance with the **Five Safes Framework** (https://ukdataservice.ac.uk/help/secure-lab/whatis-the-five-safes-framework).

Please see the Youth Endowment Fund's data archive privacy notice here for further details: https://youthendowmentfund.org.uk/wp-content/uploads/2021/07/YEF-Data-Guidance-Participants.pdf

# How we protect your data

We implement appropriate technical and organisational measures to protect your data that we process from unauthorised disclosure, use, alteration or destruction. We have completed a **data protection impact assessment** to make sure your personal information is secure and protected at all times throughout this research study. Your information is securely stored on a dedicated drive, and access is controlled by Coram only in accordance with Data Sharing Agreements in place between the Youth Endowment Fund, Coram and UpskillU and the referral partners. We will always keep these Data Sharing Agreements under review to make sure that the measures we have implemented remain appropriate.

# Your rights and options

Your rights relating to your personal data include:

 You have the right to access your personal data and can request copies of it and information about our processing of it

<sup>&</sup>lt;sup>1</sup> Department for Education - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>2</sup> Ministry of Justice - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>3</sup> Home - Office for National Statistics (ons.gov.uk)

- 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 you can object to us using it this way
- · We are not using your personal information for direct marketing purposes

#### Contact us

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

**Project**: EXODUS

**Organisation**: Coram

Address: 41 Brunswick Square, London, WC1N 1AZ

Email: research@coram.org.uk

**Call or text:** 07805 813 071



## How to complain

You can lodge a complaint with the Information Commissioner's Office:

Address: Wycliffe House, Water Lane, Cheshire, SK9 5AF

Helpline phone number: 0303 123 1113

ICO website: <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>

# Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown in the footer. We will notify you of the changes where required by applicable law to do so.