**Privacy Notice**

This note is to say what we do with the information that you share with us as part of this project and your rights about our use of that information. These rights are set out in the General Data Protection Regulations (GDPR) and the Data Protection Act (2018), which tell us what we have to do by law.

1. **Who we are**

Anna Freud, University College London (UCL), and the Institute for Fiscal Studies (IFS) are conducting a project, ‘*Learning about the Turnaround programme’,* funded by the Youth Endowment Fund. This notice informs you how we will use personal data collected for the purposes of conducting this project. If you have any questions about the content of this notice, then you can contact us at:

* Julian Edbrooke-Childs: [Julian.Edbrooke-Childs@annafreud.org](mailto:Julian.Edbrooke-Childs@annafreud.org)
* Write to us: Anna Freud, 4-8 Rodney Street, London N1 9JH
* Our Data Protection Officer (DPO) is Rachel Hart, [DPO@annafreud.org](mailto:DPO@annafreud.org)

1. **Purpose of data (information) processing and the lawful basis for processing**

Turnaround is a new way of providing support to children on the cusp of the youth justice system. We are consulting with experts by professional and lived experience to help understand what is Turnaround and how we could best do a bigger project to look at the impact it has on children and families.

We will hold up to three types of personal information provided by you:

* + Your name and contact details
  + Your survey responses

The UK GDPR basis for processing these data is Legitimate interest, Article 6(1)(f), specifically research purposes (Article 9(2)(j)) and DPA (2018) Schedule 1 part 1 paragraph 4. This allows us to process your personal data for research or evaluation purposes where appropriate care is taken to manage the data securely.

1. **Who we share your data with**

We will not share your data with any other external partners or agencies. The information we collect will only be available to project team members at Anna Freud and will not be shared with UCL or IFS. Generally, we will ask for your permission before we share your data, but in some circumstances, we are legally obliged to share information, for example under a court order. When we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision-making.

We will not be transferring any identifiable information outside the European Economic Area (EEA). We will be managing the data on IT systems at Anna Freud, based in the UK, and we will be taking appropriate measures to ensure that it always remains secure.

1. **How long will we retain your data?**

Your personal data (e.g., your name, contact details, survey responses) will be held securely at least until the end of the project, 31st September 2023, after which it will be securely disposed of, but we will retain your survey responses (which will be anonymised) for research purposes for a minimum of 10 years.

If we progress to the bigger project, we will retain your name and contact details after 31st September 2023 until the end of that project (end of 2026). We will let you know if this is the case, and you will be able to ask us to remove your contact details.

1. **Your data rights**

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the Information Commissioner's website [<https://ico.org.uk/for-the-public/>] for more detail or contact Rachel (Anna Freud’s DPO). Your rights are:

* + The right to be informed
  + The right of access
  + The right to correct data
  + The right to be forgotten
  + The right to restrict processing
  + The right to data portability
  + The right to object to our processing

Please contact us at [DPO@annafreud.org](mailto:DPO@annafreud.org) if you wish to make a request with regard to any of your rights. You are not required to pay a charge for exercising your rights. We generally have one month within which to respond to your request.

1. **Withdrawal from the project**

If you no longer want to participate in the ‘*Learning about the Turnaround programme’* project, then you can withdraw at any time until the end of the project on the 31st September 2023, with no disadvantage to you, and we will respect that decision and cease processing your data. You can contact us using the contact details included at the top of this notice to make such a request. Please note that once we have written the reports of the findings (by the end the project), it will not be possible to withdraw your contributions, so it is best to tell us as soon as possible if you do change your mind.

1. **Making a complaint**

If you feel that we may not be handling your data appropriately or if you have any queries or concerns about this, you can contact us at [DPO@annafreud.org](mailto: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>.

1. **Obligation to provide data and automated decision-making**

You can choose to participate in this project, in which case we do require your data. We do not use profiling or automated decision-making when processing your data for any purpose.