

## Data archive privacy statement

Guide to how we'll use and protect your data

# About the Youth Endowment Fund and the data we collect from our projects

The Youth Endowment Fund (YEF) is an independent charity with a £200m endowment and a mission that matters. We're here to prevent children and young people becoming involved in violence. We do this by finding out what works and building a movement to put this knowledge into practice. In building and sharing knowledge about what works, we'll help people in power make good decisions based on evidence.

To make sure we can understand which approaches are most effective, we'll need to collect and store sensitive personal data so that we can follow-up on children's progress in the future. We'll keep the results of our project evaluations in a secure archive, so that approved researchers can use it to better understand children and young people's involvement with crime in the future.

Data in the YEF archive will be linked with official crime records, so we can see if participation in a project leads to lower offending. There are many safeguards in place to protect this data and to ensure individuals' identities won't be known to those using the data.

This document explains in detail how we'll protect and use your data and your rights.



### Overview of the evaluation and archiving process

You can find a diagram showing how your data is used in the evaluation and archiving process in the Annex.

## The evaluation process in more detail

Every time YEF supports a project we ask an independent organisation to evaluate the impact of the project. Evaluation can involve:

- initial tests to find out how and whether the project can be delivered, and the views and experiences of those taking part;
- further investigation to see whether the project has the potential to improve outcomes;
- more in-depth analysis that allows us to confidently say whether or not a project has reduced incidences of crime and violence.

If you take part in a project that YEF supports, you will be given information about the organisation that will carry out the evaluation and what personal information will be shared with the evaluator.

You can choose whether you want to take part in the evaluation. If you do take part, it is likely that the evaluator will ask you to complete a questionnaire or interview. They will use the information collected from you as part of their evaluation.

Once the evaluation is complete, the independent evaluator will write a report which will be published on our website. The report will not contain any personal data about the people who took part in the project and it will not be possible to identify individuals from the report.

We might also ask parents or guardians of people who take part to complete a survey, which could include information about the young person taking part in project or information about the parent or guardian themselves. Our research is focused on young people and we're not looking to identify individual family members. This data is only collected so we can better understand the lives of the young people we support and what works to improve their outcomes.

### The YEF archive in more detail

We want to know whether taking part in one of our funded programmes prevents children from being involved in crime and violence as they grow older. To do this, we will keep information about the young people who have taken part in an archive so that more research can be done in the future. In some cases this might include information from their family members or guardians as well.

YEF will take steps to protect the information in our archive:

### Step 1 - Pseudonymisation

The YEF will ask evaluators to send the personal data about the young people who have taken part in a project (name, gender, date of birth, and in some cases home address), to the Department for Education (DfE).

The YEF has a contract with the DfE instructing them to match each young person with their unique Pupil Matching Reference number, which is held in the DfE's National Pupil Database (NPD).

Once this has been done, the DfE will delete the personal data that they received from the evaluators. From this point on, it will no longer be possible to identify an individual young person from the information. This process is called 'pseudonymisation'.

#### Step 2 - Secure storage

Once the information has been pseudonymised, YEF will instruct the DfE to transfer it to our secure archive with the Office for National Statistics (ONS). Here it will be combined with all the other data collected during the evaluation. The ONS will hold the data in the archive on behalf of YEF in its Secure Research Service (SRS).

#### Step 3 – Linking NPD data with information in the Police National Computer

The DfE links information held in the NPD (for example, information about educational attainment information, and about truancy and exclusions) with criminal justice information stored by the Ministry of Justice (MoJ) in the Police National Computer (PNC).

The DfE will transfer this linked data to the SRS so that it can be linked with the pseudonymised data held in the YEF archive. This will make it possible to carry out research into the long-term impact that the projects funded by YEF have on reducing children and young people's involvement in crime.

### Step 4 – Access to the YEF archive for research

YEF will only allow information in the archive to be accessed and used for research in accordance with the ONS's 'Five Safes' framework:

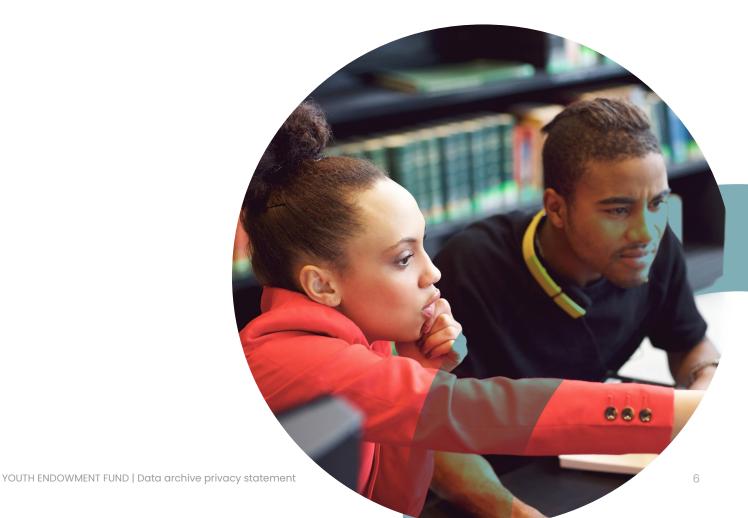
- **Safe people:** researchers must apply to access the information in the archive and must have relevant academic qualifications or work experience. If their application is successful, the researchers will be trained by the ONS in how to use data in the SRS.
- Safe projects: there are restrictions on how researchers can use the data. YEF must give its support to each research proposal and the researcher must demonstrate that the research will serve the public good (for example, increasing knowledge in an area of public interest such as what helps prevent children offending). All proposals must also be supported by a recognised ethics panel and will be assessed by the ONS's independent Research Accreditation Panel.
- Safe settings: researchers cannot move any data in or out of the SRS. The ONS use a combination of secure technology, physical security measures, and extensive procedures and protocols to protect the data when it is being used. For example, researchers are unable to access the internet and only approved software can be used. The ONS also use protective monitoring software, including recording every keystroke made by the researcher.
- Safe data: researchers can only use data that have been de-identified, so they will not be able identify individual people from the data.
- Safe output: once the researcher has completed their project, two members of ONS independently review the research to ensure that your privacy and confidentiality is safeguarded. All research must be published.

We are confident that the SRS provides a very high level of protection for the data that will be held in the YEF archive. It means that YEF data will be protected in the same way as school and higher education records.

In addition to the SRS protections listed above, data in the YEF archive will be protected by laws which:

- prevent the information from being used in any way that would be likely to cause substantial damage or distress to an individual (for example, financial loss, physical harm, significant emotional or mental harm); and
- make it unlawful for anyone to use the data to make decisions or take actions
  against a person (for example, it would be unlawful for the Home Office to use
  the data in the YEF archive data to identify individual people for the purposes of
  immigration enforcement).

The YEF data can only be used for research that is in the public interest and has ethical approval.



## Matching data in the YEF archive with other information

Information about people who take part in a project supported by YEF can be linked with education and criminal justice records (see <u>Step 3</u> – linking NPD data with information in the Police National Computer).

In the future, researchers might also want to link information in the YEF archive with other data sources in order to carry out their research. All research requests will be scrutinised in accordance with the ONS's five safes framework (see <a href="Step 4">Step 4</a> – controlling access to the archive for research) and researchers will only be permitted to combine the data held in the YEF archive with other information if their project meets the necessary criteria including:

- demonstrating that the research will serve the public good in one of the ways defined by the ONS;
- · being supported by a recognised ethics panel; and
- passing assessment by the ONS's independent Research Accreditation Panel.

### How YEF complies with data protection laws

When you take part in a project that is supported by YEF, you should be given information about how your personal data will be used by the organisation running the project and the organisation doing the evaluation (see <a href="The evaluation process in more detail">The evaluation process in more detail</a>). During the project and the evaluation period, they are the 'controllers' of your personal data. In some cases, others, such as those responsible for signing you up to the project, who will also be joint 'controllers' of your data. They will let you know. If parents or guardians data is also being collected, they will also be provided with information about the project and the evaluation.

When the evaluators transfer information to the DfE and ONS (see <u>Step 2</u> – pseudonymisation), YEF will become the controller of your personal data. The DfE and the ONS will act as our 'processors'. This means that YEF controls how the DfE and ONS can use your personal data. Your personal data will not be transferred to any country outside the UK.

### Our lawful basis for using your personal data

The work of YEF is funded by the Home Office under their legal powers to assist victims, witnesses, or other people affected by criminal offences. When YEF uses your personal data for archiving and research purposes, we are performing a task in the public interest and this give us a lawful basis in data protection law to use your personal information.

We might also use 'special categories' of your personal data (for example, information about your health, religion, or ethnic origin) as well as criminal offence data about you. Because we will put in place safeguards to protect this kind of personal data (see <a href="https://example.com/YEF archive in more detail">The YEF archive in more detail</a>), data protection laws allow us to use this data for archiving purposes in the public interest, research purposes, and statistical purposes.

### How long will we keep your personal data?

Data protection law permits us to keep your personal data for long periods of time where necessary for research, archiving in the public interest, and statistical purposes. This includes parents and guardians data where this is also being collected.

YEF will only keep your personal data for as long as it is needed in order to carry out future research. We expect this to be for a long period of time but we will carry out a review every five years to assess whether there is a continued benefit to storing the personal data in the archive, based on its potential use in future research.

### **Your rights**

Once your personal data has been transferred to YEF for archiving, you have the right to:

- · ask for access to your personal data;
- ask us to correct personal data that we hold about you which is incorrect, incomplete
  or inaccurate.

In certain circumstances, you also have the right to:

- ask us to erase your personal data where there is no good reason for us continuing to hold it;
- · object to us using your personal data for public interest purposes;
- ask us to restrict or suspend the use of your personal information, for example, if you want us to establish its accuracy or our reasons for using it.

These rights extends to the parents and guardians on whom we may also hold some personal data.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: https://ico.org.uk/make-a-complaint/.

### Our contact details



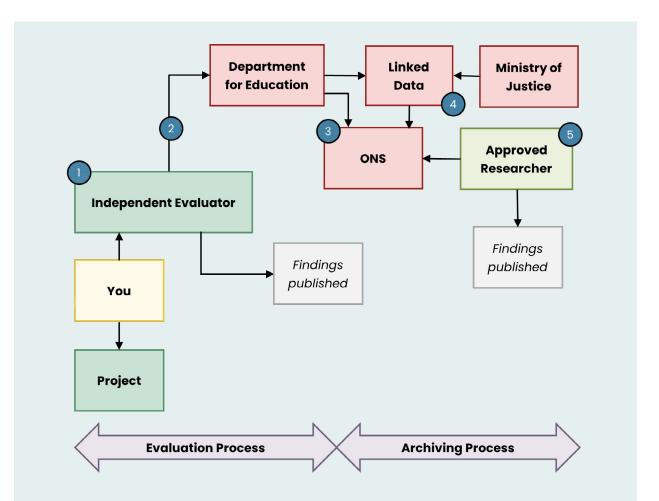
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### **Annex**

How your data will be used.



**Evaluation:** – Data is collected from you as part of the evaluation to see if the project can improve outcomes over the project period

**Pseudonymisation:** - Data is sent to the DFE and ONS. Identifying data is removed by the DfE from your records to prevent researchers identifying you when they access your data in the future.

**Secure Storage:** - Your deidentified data will be held securely in the YEF archive by the ONS, in a way that nobody can access it without approval.

**Data-Linking:** - The DfE and MoJ will link together data on education and crime records and this will be transferred to the ONS to be securely matched to the data on you and held in the YEF archive.









### youthendowmentfund.org.uk



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This document was last updated in **December 2022.** 

We reserve the right to modify the guidance at any time, without prior notice.

The Youth Endowment Fund Charitable Trust

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