



# **Data protection information for YEF evaluations**

**Guidance for projects and evaluators**

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## Introduction

At the Youth Endowment Fund (YEF), we take data protection very seriously. Our projects will often involve the processing of sensitive and personal data. We want to make sure that data is used in a way that is fair, lawful, and transparent at all stages. This guidance is to help all those working on YEF funded projects to:

- understand how personal data should be processed for the purposes of YEF evaluations;
- and, identify the most appropriate lawful basis in the GDPR and the Data Protection Act 2018 for processing participant personal data.

We also provide guidance on how this should be communicated with the participating in our projects.

## About the Youth Endowment Fund

The Youth Endowment Fund (YEF) is a charity with 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.

We know that to make a lasting difference we must do more than just fund and evaluate promising programmes. We need to establish consensus about what works and build a movement around making sure that children get the very best support possible.

## YEF approach to evaluation

The core of the YEF's mission is to evaluate what works to prevent children and young people offending. We do this through:

- **Evaluation:** conducting independent rigorous evaluation of the projects we fund over the evaluation period, looking at a range of offending and intermediate outcomes; and,
- **Archiving:** collecting, storing, and archiving data on participants so they can be followed-up and their outcomes assessed against criminal justice records in future years.

[Annex A](#) provides an overview of how data flows operate throughout the evaluation and archiving process. More details on these are provided below.

### Evaluation

The YEF funds organisations running projects (the grantee). For each project, the YEF contracts with a third-party evaluator (the evaluator) to assess the project's impact over the evaluation period. The evaluation decisions are made by the evaluator, in collaboration with the grantee and the approach is signed-off by the YEF.

The YEF approach to evaluation can be found in our evaluation commissioning guidance ([published here](#)). We fund broadly three types of evaluation:

- **Feasibility studies** – For interventions in the early stage of development and could benefit from further refinement and specificity. The main aim of a feasibility study is to ensure that the intervention is ready for piloting.
- **Pilot studies** – For interventions that are well-specified and have shown to be feasible in the UK, but where it is not yet clear whether a full efficacy study is feasible. It involves piloting the research instruments, impact evaluation approaches (e.g. randomisation) and resolving any potential challenges ahead of an efficacy trial.
- **Efficacy studies** – Efficacy studies are rigorous evaluations designed to determine if an intervention works under ideal circumstances. The typical involve the use of a comparison group and methods such as random assignment or quasi-experimental approaches to reduce potential sources of bias and to increase our confidence in ascribing causality.

## Archiving

In addition to assessing the impact of our projects over their evaluation period, we also wish to evaluate their impact on long-term. And we want to look at offending behaviour, which many of our trials won't specifically be looking at over the period we fund them. In addition to long-term follow-up, the data held in the archive may be used to conduct:

- quality assurance, reanalysis and methodological exploration across the outputs and results published in the YEF funded evaluation reports; and
- pooled analysis of data from multiple interventions, to explore what works in different geographic areas and for particular subgroups (e.g. gender, ethnicity, child who have experienced periods of care etc) that may be identified from the data collected from the projects themselves or from the linked administrative datasets.

To do this we need to collect and store personal data on those that take part. This includes those in a comparison or control group recruited during the evaluation. This is needed so we can identify all the evaluation participants in education and criminal justice databases in the future. **This applies to all pilot and efficacy studies, but not projects evaluated at the feasibility stage.**

## How the YEF archive works

The archive will be made up of the individual young person level data collected as part of YEF funded evaluations. This may also include data provided by their parents or carers. Relevant identifiers will also be collected on the young people so that YEF can match the participants with their education and criminal justice records. What identifying data is collected will differ.

- For projects **delivered in schools**, this will include data on pupils' names, gender, date of birth and unique pupil reference number (UPN) held by the school.
- For projects **not delivered in schools** or where UPNs cannot be obtained, children's address will also be needed, along with their name, gender and date of birth.
- For **all projects** we'd also additionally request that information on the school that the child attends is collected, including its LAESTAB number (local authority establishment number) or URN (unique reference number). More information on finding out what this can be found [here](#).

### What happens if participants opt out of the evaluation and archive?

Children must be given the choice of whether to take part in the evaluation and having their data archived. For our Launch Grant Round (LGR) projects (projects launched in 2019 and 2020), participants may opt out of taking part in the evaluation and still take part in the project.

For all projects funded in Ground Round 1 (GR1) and beyond (those commissioned in 2021 or later), agreeing to be part of the evaluation and having their data archived is a condition of taking part in the project. For children that choose not to take part in the study, all the usual services available to them will continue. However, only in exceptional circumstances will they be allowed to take part in the project being trialled.

Evaluators should not offer participants the option to take part in the evaluation but opt out of the archive. It is a condition of taking part in the project that participants agree to have their data processed as part of the evaluation and to have their data archived.

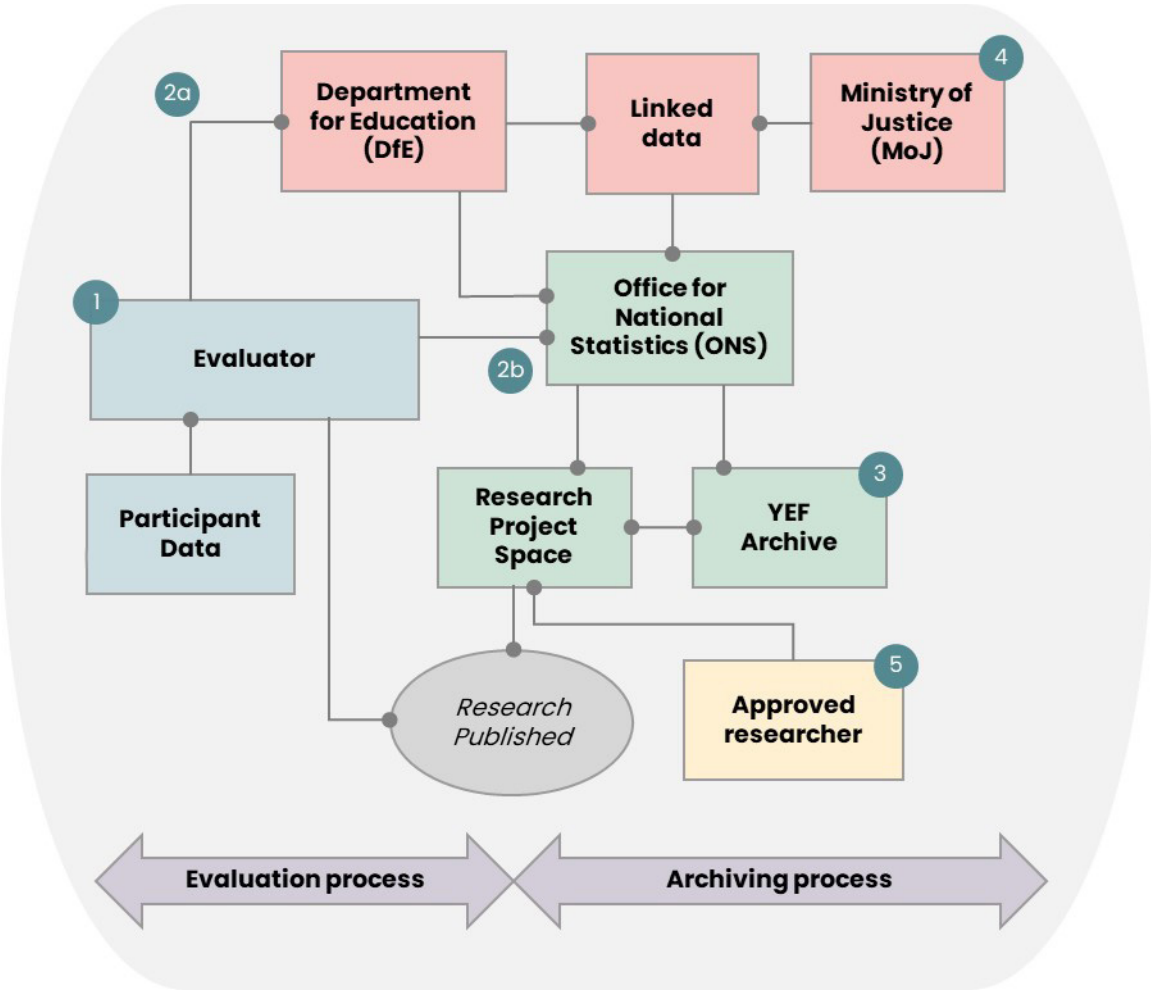
Note that children can change their mind about taking part in the evaluation once it has begun and they will still be able to take part in the project. This is outlined in the template information sheets in [Annex B](#).



The diagram below shows how the process will work. The main steps are:

1. **Evaluation:** Personal data is collected from participants by the evaluator and analysed. Data may also come from parents, providers or practitioners. Evaluators analyse the data and publish findings in a deidentified form.
  2. **Data submitted for archiving:** Two data sets are created and submitted separately to the DfE and ONS:
    - I. One dataset contains just children's identifying data and a unique project specific reference number for each child. This is submitted to the DfE and pseudonymised – a process where the personal identifying data is removed and replaced with DfE's pupil matching reference numbers (PMRs). The PMRs and the project specific reference numbers are then submitted to the ONS for storage in the YEF archive.
    - II. The second dataset contains all the evaluation data and the project specific reference numbers. This is submitted directly to the ONS, where it's also stored in the YEF archive.
- The inclusion of the project specific reference numbers in both the data submitted to DfE and the data submitted to ONS allows both datasets to be recombined once they're in the ONS secure environment. Once the data has been submitted to the DfE and the ONS, the YEF will become the controllers.
3. **Secure storage:** Both datasets are held securely in the YEF archive by the ONS, who manage the archive on our behalf. Nobody can access the data without approval from us, nor without being an ONS accredited researcher.
  4. **Data-linking:** The DfE and MoJ routinely link together education and crime records. On request, this can be made available in the ONS secure research environment. Due to the inclusion of the PMRs in this data and the records of the children in the YEF archive, it's possible to match both datasets in the future, in-order to follow-up on education and offending outcomes.
  5. **Access to the YEF archive:** In the future, approved researchers may apply to access YEF data via the ONS secure research service. This will be accessed via their own project space created in ONS secure research environment by the ONS. They may apply to the DfE and MoJ to access the linked NPD-PNC data, and if successful it will be made available here to combine with the YEF evaluation data, using the PMRs. Researchers will only be able to access pseudonymised data. All results will be published in a deidentified form.

Figure 1: Overview of the YEF archiving process<sup>1</sup>



<sup>1</sup> In some cases evaluators will be conducting their analysis inside the SRS environment, during the evaluation period. Annex A shows how the archiving process works in these cases.




## How will data be kept safe in the archive?

Data managed in the SRS is governed by 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 the YEF data and they must pass an assessment. Once a researcher is accredited, the ONS will continue to monitor how they use the data in the SRS.
- **Safe projects:** there are restrictions on how researchers can use the data. The YEF must give its support to each research proposal and the researcher must demonstrate that the research will serve the public good in one of the ways defined by the ONS. 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 staff in the ONS's Research Services and Data Access team independently review the research to ensure that individual's privacy and confidentiality is safeguarded. All research must be published.

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 a debt recovery company to use the data in the YEF archive data in order to find out where someone lives).



Ultimately this means data collected on trial participants and stored in the YEF archive cannot be used to identify or target individuals, will only be handled by approved researchers, and will be managed in a secure environment<sup>2</sup>. All further analysis of YEF data held in the archive will be for research purposes and for the public benefit, and will have ethical approval.

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<sup>2</sup> For further information on the SRS security arrangements, see the overarching data security and information governance for the SRS in our DPIA for the YEF archive. In addition, links to registration and accreditation can be found with: the ICO ([here](#)); NHS digital ([here](#)); and, as a processor under the Research Strand of the Digital Economy Act ([here](#)).

## Roles and responsibilities for data processing

During the evaluation period, evaluators and grantees (the Project Team) will be responsible for complying with the data protection legislation. The Project Team must:

- i. determine the purposes and means of processing personal data; and
- ii. decide which lawful basis to rely on.

When evaluations have finished the YEF will become the controller of the personal data. The YEF will not process any personal data for evaluation purposes, this is done by evaluators/grantees during the evaluation periods. The main roles and responsibilities are as follows:

- **Evaluators:** controllers of personal data throughout the evaluation period<sup>3</sup>.
- **Grantees:** controllers of any participant personal data collected by the grantee and, potentially, joint controllers during the evaluation period along with the evaluator (i.e. when they make decisions together with the evaluators about what data will be collected and how they will be processed).
- **Youth Endowment Fund:** controller for the archive following the end of the evaluation period, at the point data is transferred to the DfE and whilst it's stored in the SRS.
- **Department for Education:** processor on behalf of the YEF whilst they match children to the NPD. The DfE will only process YEF data for the purpose of pseudonymisation. Once this is completed and data transferred to the ONS, all YEF data will be removed from their systems.
- **Office for National Statistics:** processor on behalf of the YEF for the archive when data is transferred to the SRS. The ONS will process data in the archive only on instruction from the YEF. Processing activity will include, receiving the data into the SRS, checking of the data and preparing cuts of the archive for future research projects.

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<sup>3</sup> For the purposes of being able to write academic papers and/or to conduct further research, data collected on project participants may be retained by the project team at the end of the YEF funded evaluation. It is for the project team to decide when and how data will be anonymised and to ensure compliance with data protection legislation (where applicable) where it is retained after transferring the personal data to the DfE.

## How is the final dataset supplied for archiving at the end of the evaluation?

Full details of how the data should be prepared for archiving are available in our guidance for submitting data, which is available [here](#).

At the end of the evaluation period (for pilot and efficacy studies), two separate datasets are needed. One for the ONS and one for DfE. In both datasets, unique reference numbers for each child will need to be created (as detailed in our guidance for submitting data). In addition, the two datasets will need.

### DfE data

- Personal identifying data (e.g. name, date-of-birth, address etc.) and details on the schools attended, as described in this document above.

### ONS data

- Information on the intervention received (e.g. assigned to treatment or control groups, date or timing of intervention, any assessment of fidelity such as number of sessions completed etc.);
- Any characteristic or contextual information on project participations, used by evaluators in generating results published in the evaluation report; and,
- The main pre-post-test outcome variables used to evaluate the effectiveness of the intervention.

The project team will need to ensure all necessary data sharing arrangements are in place so that the evaluator has the necessary data at the end of the evaluation period so that they can transfer it to the DfE and ONS. In many cases, both the evaluators and grantees will be responsible for collecting and processing personal data. However, pulling together the data and submitting it is responsibility of the evaluator and cannot be done by the grantee.

## Lawful basis for processing YEF personal data

Evaluators (and sometimes jointly with grantees) will need to decide under what legal GDPR basis they are processing personal data during the evaluation period. We have prepared the guidance below for the interests of clarity and consistency with the approach that the YEF will take to processing personal data in the archive (see section 9 below). The YEF cannot instruct evaluators and grantees on the correct legal basis to use for processing personal data for YEF funded projects. However, guidance issued by the Information Commissioner's Office (ICO) is clear that using consent is not always the most appropriate legal basis to use.

### Performance of a task carried out in the public interest

Article 6(1)(e) of the GDPR can be used to process personal data for YEF purposes as:

*processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller*

This is often referred to as the “public task” basis.

Article 6(3) says public task processing must be laid down by EU or Member State law. In the UK, section 8 of the Data Protection Act 2018 (DPA) says that the public task basis can cover processing that is necessary for:

- the exercise of a function conferred on a person by an enactment or rule of law; and/or
- the exercise of a function of the Crown, a Minister of the Crown or a government department.

This is not an exhaustive list and [guidance](#) published by the ICO confirms that controllers may have other official non-statutory functions or public interest tasks that entitle them to rely on the public task basis, as long as the underlying legal basis for that function or task is clear and foreseeable. In the case of the YEF, our work is funded by the Home Office in the exercise of their statutory powers to assist victims, witnesses or other persons affected by offences.

The [ICO guidance](#) is also clear that the public task basis can be used by any organisation carrying out a specific task in the public interest. It is not restricted to public authorities – the focus is on the nature of the function, not the nature of the organisation. On this basis, work carried out by grantees and evaluators as part of the YEF project can be a task carried out in the public interest.

## Alternative lawful basis

As an alternative to the public task basis, evaluators might consider Article 6(1)(f) of the GDPR – legitimate interests. This is a flexible basis for processing but, as the controller, you must first undertake an assessment to balance the legitimate interests in question against the rights and freedoms of the data subjects (i.e. the children participating in the YEF funded projects).

The ICO recommends that controllers carry out a legitimate interests assessment (LIA). This involves applying the following three-part test to the processing activities to be carried out:

- identify the legitimate interests (these can be your own interests, or the interests of a third party such as the Home Office, the YEF, the beneficiaries and/or the public at large);
- apply the 'necessity test' (this involves thinking about whether there is another less intrusive way to achieve the same result); and
- carry out a balancing test to decide whether the impact of the processing on the data subject overrides the legitimate interest (the ICO suggests that controllers think about: the nature of their relationship with the data subject; whether the data is sensitive or private (e.g. criminal offence data); whether children's data is involved; whether people might find it intrusive; and whether the controller can offer an opt-out).

You can find more information about carrying out an LIA on [this page of the ICO's website](#). Ultimately, it will be for you as the controller to decide whether the legitimate interests test is met.

## What about consent?

While it will be for individual evaluators and/or grantees (as the controllers of the personal data) to decide what lawful basis to use when processing personal data, we do not think that consent (Article 6(1)(a) of the GDPR) will be appropriate for YEF purposes in most instances because:

- the GDPR sets a high standard for consent to process personal data, it must be specific and you must name any third party that will rely on the consent – this will not be possible as the YEF data may be used in the future by a variety of approved researchers;



- if consent is used, there is no scope to process the personal data for other compatible purposes under Article 6(4) of the GDPR – the precise ways in which the YEF data will be used for research purposes cannot be known at this stage; and
- the right to request erasure of personal data applies if consent is used as the lawful basis for processing, and there are no grounds for refusing a request if the individual has withdrawn their consent – this runs counter to the core purpose of the YEF to use the data gathered from the projects we fund to evaluate their long-term impacts. This contrasts with the public task basis (where the right to erasure does not apply) and the legitimate interests basis (where controllers may have an overriding legitimate interest to continue the processing). More information can be found in the [ICO's guidance on the right to erasure](#).

The [ICO's detailed guidance on consent](#) specifically states that there is no rule that says you have to rely on consent to process personal data for research purposes, even if you have a separate legal or ethical obligation to get consent from the people who are participating in the research.

## **Difference between GDPR and ethical consent**

In order to obtain ethical approval for a project and to comply with accepted ethical standards for research, researchers will generally need to obtain the informed consent of individual participants for their involvement in the research. The information sheets produced in [Annex B](#) are intended to help evaluators in getting that approval. GDPR recital 33 notes that research must act in a manner that is 'in keeping with recognized ethical standards for scientific research', and ethical review boards will usually expect informed consent.

In effect in order to use personal data for research you need two bases; the legal basis (GDPR) and the ethical basis (informed consent). For example, a person may be asked to consent to participate in research (ethical basis) and told that, if they agree to participate, data about them will be processed for a task in the public interest (legal basis). Here, the legal basis for data processing will be 'public task' rather than consent.

While consent to participate in a project that is obtained for ethics purposes must be fully informed and freely given, in addition to meeting other requirements, researchers do not need to adhere to the consent rules in the GDPR when obtaining ethical consent.

If evaluators give privacy information to participants (for example, in a privacy notice) it is important to distinguish consent to process personal data under Article 6(1)(a) of the GDPR from any ethical consents that your organisation or institution might require you to obtain.

## Processing of special category and criminal offence data

We recognise that many YEF evaluations will involve processing special categories of personal data (e.g. information about health, religion, race, and/or ethnic origin) and potentially criminal offence data as well.

When you process these more sensitive types of personal data you must still have a lawful basis under Article 6(1) of the GDPR, but you must also identify an additional basis under Article 9(2) of the GDPR (for special category data) or under Article 10 of the GDPR (for criminal offence data). Both Article 9(2) and Article 10 of the GDPR require a basis in UK law and, as with public task basis discussed above, in the UK this is found in the DPA.

### Special category personal data

Special categories of personal data used in connection with the evaluation may be processed under Article 9(2)(j) of the GDPR – processing necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Section 10 of the DPA says that processing meets the requirement in Article 9(2)(j) of the GDPR if it meets a condition in Part 1 of Schedule 1 to the DPA. Paragraph 4 of Part 1 of Schedule 1 sets out the condition that applies to research in particular; it must be:

- necessary for archiving purposes, scientific or historical research purposes or statistical purposes;
- carried out in accordance with Article 89(1) of the GDPR, as supplemented by section 19 of the DPA (see below); and
- in the public interest.

The [ICO's detailed guidance on special category data](#) confirms that the requirement for processing to be "necessary" does not mean that it has to be absolutely essential; it must be more than just useful or habitual and must be a targeted and proportionate way of achieving your purpose. The ICO's guidance also confirms that the public interest requirement covers a wide range of values and principles relating to the public good, or what is in the best interests of society. As long as you can make specific arguments about the concrete wider benefits of your processing, the public interest test will be met.

The reference above to processing being carried out in accordance with Article 89(1) of the GDPR and section 19 of the DPA relates to the safeguards that need to be put in place to protect this kind of personal data. When you are thinking about what safeguards are in place to protect YEF personal data, you can take into account:

- that all participant personal data will be pseudonymised by the DfE before it is transferred to the archive; and
- the aim of the project (i.e. to evaluate the long-term impacts of YEF funded activity) cannot be achieved using anonymised data as that would prevent participant information being matched with data in other relevant data sets in the future (for example, CJS databases).

## **Criminal offence data**

The rules on processing criminal offence data are found in Article 10 of the GDPR and sections 10 and 11 of the DPA. Section 11 of the DPA confirms that references to criminal offence data in the legislation include personal data relating to:

- the alleged commission of offences by the data subject (this would include circumstances where participants self-report and/or provide information about offences in their family history); as well as
- proceedings for an offence committed or alleged to have been committed by the data subject or the disposal of such proceedings, including sentencing

In practice, if you are processing criminal offence data for evaluation purposes it is likely that you will process it in the same way as special category data. This is because section 10(5) of the DPA says that processing of criminal offence data meets the requirements in Article 10 of the GDPR if it meets a condition in Part 1, 2 or 3 of Schedule 1 to the DPA. As already set out above, we suggest that the most appropriate basis is the research condition in paragraph 4 of Part 1 to Schedule 1 of the DPA.

## Storage length of data in the YEF archive

Storage limitation is a fundamental data protection principle and the YEF will only keep the archived data for as long as necessary for the purposes referred to above (i.e. future evaluations to assess the long-term impact of YEF-funded projects on offending outcomes), as well as other potential uses such as analysis across intervention types and methodological exploration. This approach is in line with the GDPR, which permits storage of personal data for longer periods if the sole purpose is for scientific research, archiving in the public interest or for statistical purposes (Article 5(1)(e) of the GDPR)<sup>4</sup>.

As it is our intention to construct an archive of project data that will allow for future long-term follow-up and reanalysis, we are not able to specify a specific date or timeframe for deletion. It is our intention therefore to retain data in the YEF archive indefinitely. This is consistent with the ICO's view that data can be held indefinitely for research and archiving purposes. However, we will commit to reviewing ever 5 years, following submission to the YEF archive, to see whether there is a continued benefit to storing the data and its potential use in future research.

In his preliminary opinion on data protection and scientific research, published on 6 January 2020, the European Data Protection Supervisor (EDPS) acknowledged that there are few guidelines on the application of data protection rules to scientific research. We have referred to the EDPS's preliminary opinion when developing our current approach to data storage, but we note that further work is taking place within the European Data Protection Board (EDPB) and national authorities on questions of data retention for archiving and research purposes. We will continue to monitor developments in this area and review our approach to data storage and retention to ensure it continues to reflect the law and best practice in this area.

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<sup>4</sup> The ICO's guidance on storage limitation refers to this exemption and notes that personal data may be stored indefinitely for archiving, research or statistical purposes.

## Data subjects rights over data in the YEF archive

The GDPR gives data subjects certain rights over how their personal data is processed. For example, in certain scenarios they have the right to object to processing, to request erasure of their personal data, and to access their data. Article 89 of the GDPR permits exemptions from some of these rights when personal data are processed for research or statistics, or for archiving purposes in the public interest. In the UK, these exemptions are contained in Part 6 of Schedule 2 of the DPA and they include exemptions from:

- the right of access (i.e. the right to make a subject access request);
- the right to rectification (i.e. the right to correct personal data);
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right to be informed, where personal data has not been collected directly from the data subject.

Some of these exemptions will only apply to the extent that complying with the above provisions would prevent or seriously impair the achievement of the purposes for processing. We will carefully assess how each of these exemptions may apply to the YEF on a case by case basis, where appropriate.

### **What are the rights of parents and guardians over their data stored in the archive?**

In some cases, we will approach parents or guardians to provide information about their children. This could relate to the child directly, such as questions about how their behaviour changed before and after an intervention. Or it could relate to the child's homelife or the homelife and background of the parent or guardian themselves. This data will be stored alongside their child's records.

We will never store directly identifying information on parents and guardians in our archive (such as their names). However, we will always treat parent data as personal. Evaluators should share all relevant privacy information with parents and guardians when collecting data from them. Parents and guardians we will also still be subject to the same rights listed above, when it comes to accessing their own data stored in the YEF archive.



## Privacy information and data sharing

Grantees and evaluators will be responsible for providing privacy information to participants (and, where appropriate, their parents or guardians). The privacy information must meet the requirements in Article 13 or 14 of the GDPR (the right to be informed), as well as the [good practice guidance](#) published by the ICO.

Producing privacy notices is the responsibility of project teams. They will need to include information on:

- the purpose of the research and how participants data will be used as part of the evaluation;
- the rights of participants to opt out of being part of the evaluation and having their data processed;
- the legal basis on which evaluators will process participants data; and,
- an explanation of how persona data will be processed in the YEF archive.

To facilitate explaining how the YEF archive will operate, we have prepared an accessible guidance note (our Privacy Statement) that we expect projects to share with participants and their guardians to explain how their data will be used in the future. It's available [here](#).

We have also produced template information sheets ([see Annex B](#)). In line with ICO guidance, these are drafted in plain age-appropriate language. Evaluators will determine when it is appropriate for a child to consent to taking part in an evaluation and when parents or guardians should consent on their child's behalf. This is based on the child's capacity to make the decision, including their ability to understand relevant information about the project and evaluation. Some evaluators are guided by a code of ethics in determining the age children can decide for themselves.

**Before information sheets and privacy notices are shared with participants and their parents or guardians, we expect all projects to send these to the evaluation team at YEF first for review.** Ensuring information is appropriately explained to participants is vital to enable us to use their data in the future. We will check to ensure this information is in-line with YEF's approach to data processing.

We encourage all evaluators to use the templates in [Annex B](#) as a guide. The template wording can be adapted to reflect individual projects and evaluations. We have indicated in square brackets where certain information will need to be added, but evaluators (as controllers of personal data gathered during the evaluation process) are ultimately

responsible for identifying the means of processing and for ensuring that the information provided to participants is accurate.

The suggested confirmation statement at the end of the information sheets should be signed to confirm that they have read and understood the information sheet. The confirmation statement must not be confused with consent as a lawful basis to process personal data.

## Our contact details

If you have any questions about this document, about processing personal data for the YEF project, or about the project more generally, please contact us at:



Youth Endowment Fund  
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London  
EC2A 3QR

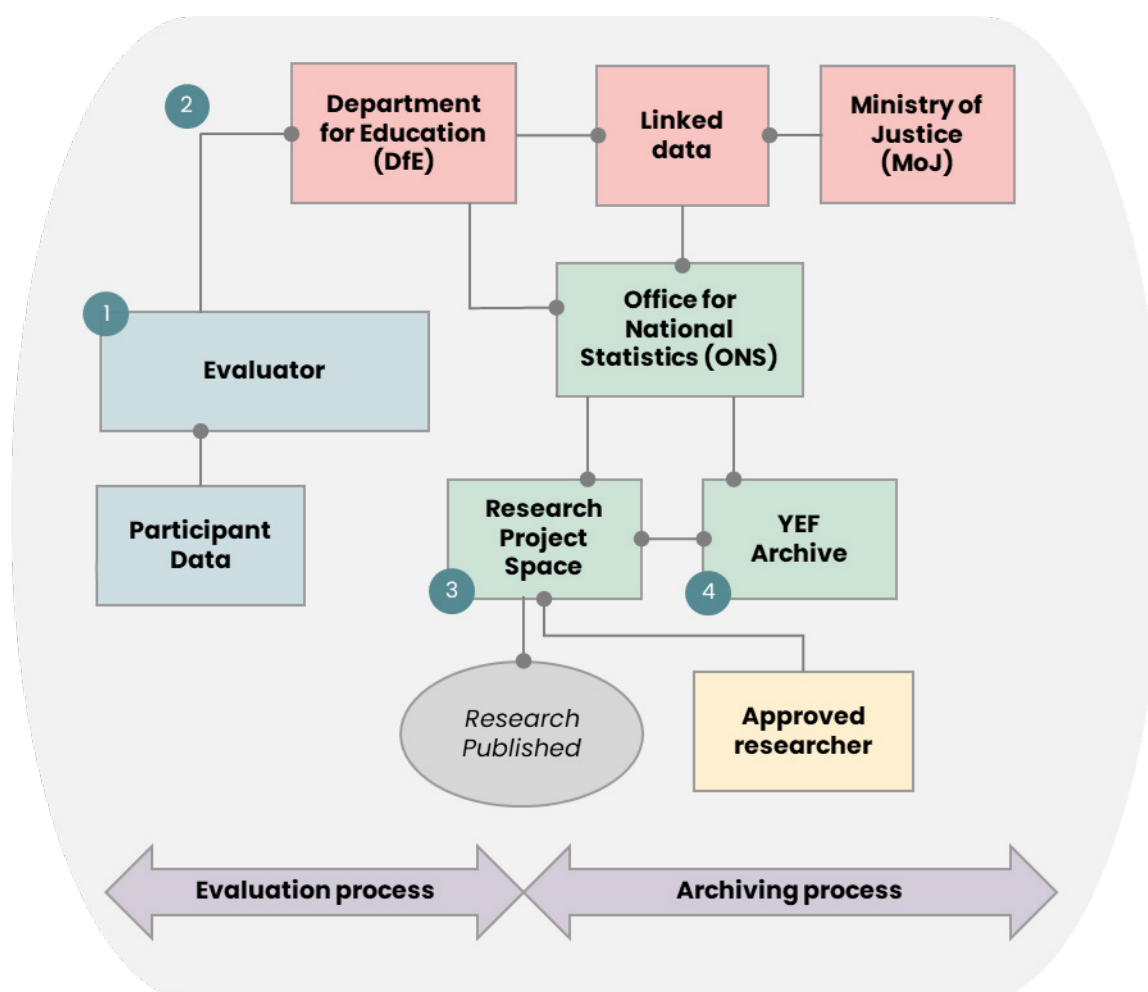


[hello@youthendowmentfund.org.uk](mailto:hello@youthendowmentfund.org.uk)


## Annex A – Data flows

In some cases, evaluators will be conducting their analysis inside the SRS before the data is transferred to the YEF archive. This may happen where the evaluation relies on using other matched administrative data (such as data on exclusions or attainment from the NPD). The diagram and steps set out below how archiving works in instances like this.

**Figure 2: Overview of the YEF archiving process for evaluation taking place inside the SRS**



- 1. Data collected by the evaluator:** Evaluators collect identifying data on the children taking part in the project (e.g. names, addresses, UPNs etc.), along with any other data required to conduct the evaluation. All the collected data is submitted to the DfE.
- 2. Linking to DfE data:** The DfE will match child's identifying data to their PMRs in the NPD. It will also be combined with any other requested data from the NPD or linked MoJ data-share. The PMRs, linked data from NPD/PNC data and all other evaluation data collected from the participants will be transferred to the ONS. All of the identifying data will be deleted. Researchers will be able to access this data in their own unique research project space.

- 
- 3. Transferring to the YEF archive:** When the evaluation ends, researchers will notify the ONS and will make available for archiving only the PMRs and the other data collected from the young people. None of the other NPD or PNC data will be pass to the YEF archive.
  - 4. Access to the YEF archive:** In the future, approved researchers may apply to access YEF data via the ONS secure research service. This will be accessed via a new project space. They may apply to the DfE and MoJ to access the linked NPD-PNC data, and it will be made available in the same way all other in the YEF archive is for future research.

## Annex B – Template information sheets

The following annex contains a template information sheet with a confirmation statement for:

- Children taking part in YEF funded projects.
- Parents/guardians when evaluations collect personal data from them.
- Parents/guardians on behalf of children taking part in YEF funded projects.

For guidance on how to use and adapt these templates, please see [privacy information and data sharing](#) of our guidance for projects and evaluators.

## Children and Young People

### AN EVALUATION OF [NAME OF PROJECT] INFORMATION FOR CHILDREN AND YOUNG PEOPLE

#### What we are doing

[NAME OF EVALUATOR(S)] is doing a study of people who are taking part in [NAME OF PROJECT].

We are trying to find out [e.g. what helps young people to manage their feelings, relationships and behaviour].

#### Who we are

##### Contact

Name of Project Lead – [NAME], [EMAIL ADDRESS], [TELEPHONE]

Name of Data Protection Officer – [NAME], [EMAIL ADDRESS], [TELEPHONE]

We are part of [NAME OF EVALUATOR]. [EVALUATOR] is called the ‘controller’ because it looks after your information.

#### What you will need to do

If you take part in the study, we will ask you to [e.g. answer some questions about yourself, your friends, and your family.]

[We will ask you to answer questions online at the start of the study. Once we finish the study, we will ask you to answer some more questions online. It should take you about half an hour to answer each set of questions.]

[We will also [call you OR speak to you [e.g. on Teams]] to ask you some questions about [NAME OF PROJECT]. This will take about an hour. We will record the conversation so that we can remember everything that’s said.]

#### Information we collect

We will ask you to give us some information about yourself, like your name and your date of birth. Some of the information we’ll ask you to give us will be special information about things like your health, or your beliefs about religion.

#### How we use your information

We will use the information you give us to find out how well [NAME OF PROJECT] has worked.

[We will also ask [NAME OF E.G. LOCAL AUTHORITY] to give us information about how quickly you and your family used the services.]



We will write a report about what we find, but the report won't include your name or any other information that could be used to identify you.

The report will go on the YEF's website and anyone will be able to read it. We might also use the report [e.g. in articles that we write e.g. on our website e.g. in presentations].

### **How we comply with the law**

We will only use your information if the law says it's ok [if using legitimate interests and it fits with your rights]. Because this study is interesting and important to lots of people, the law says we can use your information to do this kind of work.

We always keep your information safe. During the study, we only let our research team look at your information. [We don't share your information with anyone in other countries OR We may share your information with organisations in other countries but we will make sure it is always protected.]

### **Keeping you safe**

If you feel upset by any of the questions we ask you, you should tell your parent or guardian or [e.g. the project lead]. You can find their contact details in the box on the first page.

We will keep what you tell us a secret unless we think that you or someone else might be at risk of harm. If this happens then we will usually talk to you first to tell you why we want to talk to another person or organisation.

### **After the study finishes**

The Youth Endowment Fund, or YEF for short, is giving us money to do this study. When we finish the study, we'll give your information to the YEF and they will become the 'controller' of it. They will keep your information in a safe place called the YEF archive. You can find more information about the YEF archive on the YEF's website: [insert link to the YEF guidance for participants relating to the grant round relevant to your project, available from the YEF archive web page: <https://youthendowmentfund.org.uk/evaluation-data-archive/>].

Before your information goes into the YEF archive, the Department for Education will take out your name and other personal details like your address. This means that no one who looks at the information in the YEF archive will know who you are.

In the future, people can ask to use the YEF archive to do more studies to find out whether [NAME OF PROJECT], and other projects like ours, have helped young people. Only researchers who are approved by the YEF will be able to look at the archive. The police can't use the information in the YEF archive.

### **Do you want to take part?**

We want lots of people to take part because this helps us to understand what makes a difference for young people [and their families].

You do not have to take part in the study – it's up to you. If you don't want to take part, tell your parent or guardian or [e.g. the project lead]. You can find their contact details in the box on the first page.

[For projects launched in 2020]: If you decide not to take part in the study, you can still take part in [NAME OF PROJECT].

[For all other projects]: If you decide not to take part in the study, you can still get all the [e.g. services e.g. support] you would normally have. However, you won't be able to take part in [NAME OF PROJECT].

### **What happens if you change your mind?**

You can change your mind about taking part in the study at any time up until [e.g. you have completed the second questionnaire e.g. two weeks after you have been interviewed].

If you change your mind tell you parent or guardian, or contact the Project Lead. You will still be allowed to take part in [NAME OF PROJECT].

We will ask you if you are happy for us to keep the information that we already have about you. If you do not want us to keep this information, we will delete it.

If you are having second thoughts, you should tell someone as soon as possible. After [e.g. you have completed the second questionnaire, e.g. two weeks after you have been interviewed] we won't be able to delete your information. This is because we will have used your information to make our findings and to write our report.

Once your information goes into the YEF archive it can't be deleted because it needs to be used for future research.

### **How long we keep your information**

[NAME OF EVALUATOR] will keep your information [e.g. for X weeks after we finish our report]. After this we will take out your name and other personal details so no one will be able to know who you are from the data.

Information will be kept safely in the YEF archive for as long as it is needed for future research.

### **Your legal rights**

The law gives you rights over how we can use your information. You can find full details of these rights in [e.g. the privacy notice on our website [LINK] e.g. in the information sheet we have given to your parent or guardian].

### **Questions?**

If you have any questions about how we use your information, or if you want to complain,

you can contact our Data Protection Officer. Their contact details are in the box on the first page.

You also have the right to make a complaint to the Information Commissioner's Office (ICO). You can find more information about the ICO and how to make complain to them on their website <https://ico.org.uk/make-a-complaint/>.

## AN EVALUATION OF [NAME OF PROJECT] CONFIRMATION STATEMENT FOR CHILDREN AND YOUNG PEOPLE

<p>I confirm that:</p> <ul style="list-style-type: none"> <li>I have read the information sheet for children and young people</li> <li>I have had an opportunity to ask questions about how personal information is used in the study</li> <li>I have enough information to make a decision about whether to participate in the study</li> <li>I understand that I am free to withdraw from the study at any point until [e.g. I have completed the second questionnaire e.g. two weeks after I have been interviewed]</li> </ul> <p><b>I agree to take part in this study</b></p>	
Signed (participant)	Date
Name in block capitals (participant)	
Signature of researcher	Date
<p>Researcher's contact details</p> <p>[NAME]</p> <p>Tel: [NUMBER]</p> <p>Email: [EMAIL ADDRESS]</p>	

## Parents and guardians on behalf of children

### AN EVALUATION OF [NAME OF PROJECT] INFORMATION FOR PARENTS AND GUARDIANS OF CHILDREN PARTICIPATING

**Contact details:**

Project Lead – [NAME], [EMAIL ADDRESS], [TELEPHONE]

Data Protection Officer – [NAME], [EMAIL ADDRESS], [TELEPHONE]

This information sheet is for parents or guardians of young people participating in [NAME OF PROJECT].

We are carrying out a study of people taking part in [NAME OF PROJECT] to try to find out how the service might help young people [and their families] in the future. The study is being funded by the Youth Endowment Fund (YEF). At the end of the study data collected will be stored in a secure archive and used to follow-up on children's progress in the future. This will include, for example, assessing whether children who took part in YEF-funded projects were less likely to be excluded from school or get involved in crime in the future.

This information sheet contains more information about who we are, what we are doing, and why we are doing it. It also explains how we will use [your child's/the child in your care's] personal information if you agree for them to take part in our study.

#### 1. Who are we?

This study is being organised by [NAME AND ADDRESS/WEBSITE DETAILS OF EVALUATOR(S)].

When we collect and use participants' personal information as part of the study, we are the controllers of the personal information, which means we decide what personal information to collect and how it is used.

#### 2. What are we doing?

[Explain what the study involves and what outcomes it aims to achieve, e.g. We want to find out what helps young people when they may be struggling with their feelings, relationships and behaviour in school, at home and in the community. We want to know if taking part in [NAME OF PROJECT] helps young people to understand and control their emotions and behaviour, to make responsible decisions, and to find positive, safe and supportive people and places in school and their wider community. Our findings will help us to learn for the future about how best to support young people and their families.]

The YEF, which funds this study, is dedicated to preventing children and young people becoming involved in crime and violence. Once we have finished our study, YEF-approved researchers will explore whether [NAME OF PROJECT], and other programmes funded by YEF, had an impact over a longer period of time, including whether they reduced involvement in crime and violence. This is explained in more detail below.

### **3. Who has reviewed this study?**

This study has been reviewed and approved by [e.g. NAME OF RESEARCH ETHICS COMMITTEE AND RESEARCH APPROVAL ID].

### **4. Why has [your child/the child in your care] been invited to take part?**

[Your child/the child in your care] has been asked to take part in this study because [e.g. they, e.g. you and your child] are taking part in the [NAME OF PROJECT].

### **5. Do they have to take part?**

If you do not want them to take part in the study, they don't have to. It's a decision you may want to take together.

We would like as many people as possible to take part in order to aid our understanding about what makes a difference for young people [and their families].

For launch grant round projects: if [e.g. you and your child] choose not to take part in the study, [NAME OF PROJECT] will continue to be available to them.

For all other projects: if [e.g. you and your child] choose not to take part in the study, all the usual services provided by [e.g. this clinic e.g. this local authority] will continue to be available to you. However, [NAME OF PROJECT] will not be available to them.

### **6. What happens if [your child/the child in your care] takes part?**

If [your child/the child in your care] takes part in the study, they will be asked to [e.g. complete some questionnaires about their wellbeing and behaviour, their friends' behaviour, and their relationship with their family. We will ask them to fill out one questionnaire at the start of the study and one questionnaire at the end of the study (around 6 months later). The questionnaires can be completed online or we can help them to fill them in. Each one should take no longer than 30 minutes. e.g. take part in an interview over the telephone or online video call about their experience of [NAME OF PROJECT]. The interview should take no longer than 60 minutes and will be audio-recorded so that we can remember everything that was said.]

If you agree for [your child/the child in your care] to take part in this study, we will also access [e.g. their records collected by the clinicians delivering the programme. e.g. information from [NAME OF E.G. LOCAL AUTHORITY] about how quickly they were referred and seen, and how they used the services.]



## 7. Safeguarding

Occasionally, someone may feel upset about a question or issue that arises during the study. If [you or your child/the child in your care] feel upset by any of the questions they are asked as part of this study, you should tell [e.g. a researcher delivering the programme e.g. our safeguarding lead]. If [you or your child/the child in your care] you do not feel able to ask us for help, we encourage you to make contact with an external support service such as The Samaritans (Tel. 116 123, [www.samaritans.org](http://www.samaritans.org)) or Childline (Tel. 0800 1111, [www.childline.org.uk](http://www.childline.org.uk)).

We will treat the information that [your child/the child in your care] shares with us as confidential, but we may have to break confidentiality if they tell us something that makes us concerned about them or others being at risk. If this happens then we will usually discuss the issue with them first. You can find more information in our Safeguarding Policy.

## 8. How will we use the personal information that we collect?

Data protection laws require us to have valid reason to use [your child's/the child in your care] personal information. This is referred to as our 'lawful basis for processing'.

We rely on the [e.g. legitimate interests, e.g. public task] lawful basis to use their personal information. We will only use more sensitive information (such as information about their health, religion, race or ethnic origin, or any criminal offence information) if [e.g. it is necessary for research purposes or statistical purposes which are in the public interest].

We will use the information they give us to evaluate how well [NAME OF PROJECT] has worked and to write a report about our findings based on all of the [questionnaires and/or interviews we have carried out].

The final report will not contain any personal information about the people who took part in the study and it will not be possible to identify individuals from the report. The report will be published on the YEF's website and we might also use the report [e.g. in academic articles that we write e.g. on our website e.g. in presentations].

Any personal information that [your child/the child in your care] gives us will be stored securely and kept confidential.

- We may share this personal information with another person or organisation if [your child/the child in your care] tells us something during the study that makes us concerned about them or about someone else. Our Safeguarding Policy has more information about steps that we might take if we have concerns about [your child's/the child in your care's] wellbeing, or the wellbeing of another person.
- Once we have finished our study, we will share all of the information we have gathered about everyone who has taken part with the Department for Education (DfE). The DfE will replace all identifying information about the young people who have taken part in the study (their name, gender, date of birth, home address) with

the young person's unique Pupil Matching Reference number in the DfE's National Pupil Database. Once this has been done, it is no longer possible to identify any individual young person from the study data. This process is called pseudonymisation.

- Once information is transferred to the DfE to be pseudonymised, we hand over control to the YEF for protecting your personal information. The DfE will transfer the pseudonymised information to the YEF archive, which is stored in the Office for National Statistics' Secure Research Service. The YEF is the 'controller' of the information in the YEF archive. By maintaining the archive and allowing approved researchers to access the information in the archive, the YEF is performing a task in the public interest and this gives the YEF a lawful basis to use personal information.
- Information in the YEF archive can only be used by approved researchers to explore whether [NAME OF PROJECT], and other programmes funded by YEF, had an impact over a longer period of time. Using the unique Pupil Matching Reference numbers added to the data by the Department for Education, it will be possible to link the records held in the YEF archive to other public datasets such as education and criminal justice datasets. This will help approved researchers to find out the long-term impact of the projects funded by YEF because they'll be able to see, for example, whether being part of a project reduces a child's likelihood of being excluded from school or becoming involved in criminal activity.

## **9. How is information in the YEF archive protected?**

The YEF have put in place strong measures to protect the information in their archive. As well as the pseudonymisation process described in section 8, the YEF archive is protected by the Office for National Statistics' 'Five Safes' framework. The information can only be accessed by approved researchers in secure settings and there are strict restrictions about how the information can be used. All proposals must be approved by an ethics panel. Information in the YEF archive cannot be used by law enforcement bodies or by the Home Office for immigration enforcement purposes.

You can find more information about the YEF archive and the Five Safes on the YEF's website [insert this link if you are working on a YEF Launch Grant Round Project: [insert link to the YEF guidance for participants relating to the grant round relevant to your project, available from the YEF archive web page: <https://youthendowmentfund.org.uk/evaluation-data-archive/>]. We encourage all parents and guardians to read the YEF's guidance for participants before deciding to take part in this study.

## **10. What happens if you change your mind?**

You and [your child/the child under your care] can change your minds about whether they take part in the study at any time. To withdraw them from the study, contact the Project Lead using the details provided in the box at the start of this information sheet. You do not have to give a reason and you will still be allowed to take part in [NAME OF PROJECT].

If you decide to withdraw, you should tell us as soon as possible. After [e.g. they have completed the second questionnaire, e.g. two weeks after they have been interviewed] it will no longer be possible to delete their personal information already collected even

though you are no longer taking part in further [e.g. interviews, e.g. data collection]. This is because we will have used their information, along with all of the information we have gathered from the other participants, to carry out our evaluation and to write our report.

Once information goes into the YEF archive it can no longer be deleted as that would affect the quality of the archived data for use in future research.

## **11. Retention and deletion**

[NAME OF EVALUATOR] will keep [your child's/the child under your care's] personal information [e.g. for X weeks after we have transferred the data to DfE for archiving, which we anticipate to be until around [DATE] or [6 months after the date of publication]]. We may keep data for longer than this, but we will first remove any information that could directly or indirectly identify individuals – once data has been anonymised in this way, it is no longer 'personal information'.

The YEF will keep information in the YEF archive for as long as it is needed for research purposes. Data protection laws permit personal information to be kept for longer periods of time where it is necessary for research and archiving in the public interest, and for statistical purposes. The YEF we will carry out a review every five years to assess whether there is a continued benefit to storing the information in the archive, based on its potential use in future research.

## **12. Data protection rights**

[You/You and your child/You and the child in your care] have the right to:

- ask for access to the personal information that we hold about them;
- ask us to correct any personal information that we hold about them which is incorrect, incomplete or inaccurate.

In certain circumstances, you also have the right to:

- ask us to erase the personal information where there is no good reason for us continuing to hold it – please read the information in section 10 about the time limits for requesting deletion of your personal information;
- object to us using the personal information for public interest purposes;
- ask us to restrict or suspend the use of the personal information, for example, if you want us to establish its accuracy or our reasons for using it.

If you want to exercise any of these rights during the study period, please contact our Data Protection Officer using the details provided in the box at the start of this information sheet. We will usually respond within 1 month of receiving your request.

If you want to exercise any of these rights after the study has finished (i.e. after the point when information has been shared with DfE), please contact the YEF. Further information and their contact details are available in YEF's guidance for participants at the link above.

When exercising any of these data rights, we may need to ask for more information from

[You/You and your child/You and the child in your care] to help us confirm their identity. This is a security measure to ensure that personal information is not shared with a person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **13. Other privacy information**

*EITHER*

You can find more information about how we collect and use personal information in our privacy notice which [e.g. is attached to this information sheet e.g. is available on our website at [WEB ADDRESS]].

*OR*

#### **Categories of personal information**

If you decide that [your child/the child in your care] can take part in this study, we will ask for the following personal information on them:

- [e.g. first name and surname]
- [e.g. home address]
- [e.g. email address]
- [e.g. telephone number]

#### **Sharing their personal information**

We only ever use [your child's/the child in your care's] personal information if we are satisfied that it is lawful and fair to do so. Section 8 above explains how we share data with the Department for Education and the YEF. If you decide to allow [your child/the child in your care] can take part in the study, we may also share their personal information with:

- [e.g. our external suppliers who provide IT support services to us]
- [e.g. our professional advisers, for example, our insurers or our lawyers]

#### **Data security**

We will put in place technical and organisational measures in place to protect [your child's/the child's in your care] personal information, including:

- [e.g. limiting access to folders where information is stored to only those people who have a need to know]
- [e.g. replacing identifying information (e.g. name and home address) with a unique code]

#### **International transfers**

*EITHER*

We do not transfer your personal data outside the UK.

*OR*

Some of our external suppliers are located in countries outside the UK. Whenever we

transfer personal information to another country, we take steps to ensure that it continues to have a similar degree of protection.

#### 14. Feedback, queries or complaints

If you have any feedback or questions about how we use personal information, or if you want to make a complaint, you can contact our Data Protection Officer using the details provided in the box at the start of this information sheet.

We always encourage you to speak to us first, but if you remain unsatisfied 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/>.

#### CONFIRMATION STATEMENT FOR PARENTS AND GUARDIANS ON BEHALF OF THE CHILDREN IN THEIR CARE

I confirm that:	
<ul style="list-style-type: none"><li>• I have read the information sheet for parents and guardians</li><li>• I have had an opportunity to ask questions about how personal information is used in the study</li><li>• I have enough information to make a decision about whether [my child/the child in my care] can participate in the study</li><li>• I understand that they are free to withdraw from the study at any point until [e.g. they have completed the second questionnaire e.g. two weeks after they have been interviewed]</li></ul>	
<b>I agree [my child/the child in my care] can take part in this study</b>	
Name of participant/child (block capitals)	
Signed (adult on behalf of participant)	Date
Name of adult (block capitals)	
Signature of researcher	Date
Researcher's contact details [NAME] Tel: [NUMBER] Email: [EMAIL ADDRESS]	



Home Office



[youthendowmentfund.org.uk](https://youthendowmentfund.org.uk)



[hello@youthendowmentfund.org.uk](mailto:hello@youthendowmentfund.org.uk)



[@YouthEndowFund](https://twitter.com/YouthEndowFund)

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

Registered Charity Number: 1185413