



Department  
of Health &  
Social Care

## Appendix 2

# Privacy Notice

Early Support Hub Evaluation

Published [DD Month Year]

## **Summary of Initiative/Policy**

The Department of Health and Social Care ("DHSC") is asking Early Support Hub organisations to provide data which will allow DHSC to evaluate the effectiveness of early support hubs for children and young people. The aim is to strengthen the evidence base for these support services.

## **Data Controller**

The Department of Health and Social Care (DHSC) and your Early Support Hub provider organisation are the joint data controllers.

## **What personal data we collect**

We collect unidentifiable demographic data and data on the service and outcomes provided to individuals. Identifiable characteristics will be removed from the data so that individuals cannot be identified by the data. Demographics data includes information on:

- Age range
- Gender and gender identity
- Ethnicity
- Sexual Orientation
- Education/ Employment status
- Living situation
- Housing
- Geography
- Physical Disability
- Contact with the care system
- Young carers
- Autism and ADHD diagnosis
- Free school meals
- Previous mental health support

You can choose whether or not to disclose some or all of the above information - this will not affect the service you receive.

Services and outcomes data includes:

- The services which were provided
- Satisfaction questionnaire
- The dates of the services
- The outcomes of the services

## **How we use your data (purposes)**

This data is being collected as part of an evaluation to assess the effectiveness of the Early Support Hubs. Little evidence is available to guide best practise or assess which young people engage with these services and with what outcomes.

Data will be collected by the hubs through their current data collection systems. Some data will then be transformed to avoid identifiable data being released. This is then provided to the NIHR Policy Research Unit in Mental Health (MHPRU), based at University College London (UCL) in anonymised form: they will have no way of knowing who the individual people are, from whom the data were collected. The team based at UCL will then analyse the data on behalf of DHSC.

## **Legal basis for processing personal data**

Under Article 6 of the United Kingdom General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing personal data are:

The processing is necessary to perform a task or function in the public interest or for our official functions and the task or function has a clear basis in law. This supports DHSC's statutory functions in relation to the provision of a comprehensive health service.

In addition, we are also processing special category data under the following condition(s) as per Article 9 of the UK GDPR. (This is data relating to health, ethnicity and sexual orientation):

- The processing is necessary for reasons of substantial public interest, specifically DHSC's functions in relation to the provision of mental health support services for children and young people.
- The processing is necessary for scientific research purposes in the public interest, we have ensured that data are not identifiable, and we are not collecting more data than is necessary.

## **Data Processors and other recipients of personal data**

The NIHR Policy Research Unit in Mental Health at UCL are the data processors and will have access to the data on a secure data platform to complete the research for the evaluation.

## **International data transfers and storage locations**

Personal information will be stored and processed in the same way in which hubs have currently been storing and processing data.

An excel form with your anonymised data, from which you cannot be personally identified, will be uploaded by the Hubs directly to a secure storage facility at UCL called the UCL Data Safe Haven. No data will be processed outside of the UK.

## **Retention and disposal policy**

The anonymised data will be held at UCL in secure storage for 10 years, in line with UCL data protection requirements.

## **How we keep your data secure**

An excel form with your anonymised data, from which you cannot be personally identified, will be uploaded by the Hubs directly to a secure storage facility at UCL called the UCL Data Safe Haven. This has multiple levels of security and password protection. Only trained, authorised members of the MHPRU team at UCL will be able to access the data, and only through the Data Safe Haven.

## **Your rights as a data subject**

By law, data subjects have a number of rights, and this processing does not take away or reduce these rights under the EU General Data Protection Regulation (2016/679) and the UK Data Protection Act 2018 applies.

These rights are:

1. The right to get copies of information – individuals have the right to ask for a copy of any information about them that is used.
2. The right to get information corrected – individuals have the right to ask for any information held about them that they think is inaccurate, to be corrected
3. The right to limit how the information is used – individuals have the right to ask for any of the information held about them to be restricted, for example, if they think inaccurate information is being used.
4. The right to object to the information being used – individuals can ask for any information held about them to not be used. However, this is not an absolute right, and continued use of the information may be necessary, with individuals being advised if this is the case.
5. The right to get information deleted – this is not an absolute right, and continued use of the information may be necessary, with individuals being advised if this is the case.

## **Comments or complaints**

Anyone unhappy or wishing to complain about how personal data is used as part of this programme, should contact their Early Support Hub provider in the first instance. Alternatively, you can contact DHSC via [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk) or write to:

Data Protection Officer  
1st Floor North  
39 Victoria Street  
London  
SW1H 0EU

Anyone who is still not satisfied can complain to the Information Commissioners Office. Their website address is [www.ico.org.uk](http://www.ico.org.uk) and their postal address is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **Automated decision making or profiling**

No decision will be made about individuals solely based on automated decision making (where a decision is taken about them using an electronic system without human involvement) which has a significant impact on them.

### **Changes to this policy**

This privacy notice is kept under regular review. This privacy notice was last updated on 19/06/2024.

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