Data Privacy Notice

The purpose of this notice is to give assurance that the School Health Research Network's biennial Student Health and Wellbeing Survey complies with the EU General Data Protection Regulation (GDPR).

Who are we?

The School Health Research Network (SHRN; www.shrn.org.uk) is a partnership between Cardiff University, Welsh Government, Public Health Wales and Cancer Research UK. It is led by Professor Simon Murphy in the Centre for Development and Evaluation of Complex Interventions for Public Health Improvement (DECIPHer) at Cardiff University.

Every two years, secondary schools in Wales who are members of SHRN are invited to take part in a Student Health and Wellbeing Survey. Findings from this survey are fed back to schools through individualised Student Health and Wellbeing Reports in order to help schools base the work they do to improve student health and wellbeing on robust data.

Findings from the survey are also fed back to Local Authorities in individualised reports and a publically available national report of the findings is published. The survey data are also used for research into young people's health and wellbeing in the school setting.

The survey is funded by Welsh Government via Health and Care Research Wales (https://www.healthandcareresearch.gov.wales/).

What personal information do we collect?

The Student Health and Wellbeing Survey asks young people about a wide range of health behaviours, how they feel about school and demographic information.

In addition, we collect the following identifiable information from students who consent for their survey data to be used for longitudinal and/or data linkage research:

- First name and surname
- Date of birth
- Postcode

The following sensitive information is collected from all students:

- Ethnic origin
- Data concerning sexual activity (young people in year 9 and above only)
- Data concerning health

Why do we collect personal information?

Personal information, including sensitive information, is used to undertake research into young people's health and wellbeing and to provide health and wellbeing data, collated at school, local authority or national level, to SHRN member schools and partners.

In addition, identifiable information is needed to help:

- Make sure that we can compare the same young person's survey responses over subsequent rounds of the survey (longitudinal research).
- Make sure that we can undertake data linkage research, where a young person's survey responses are linked to data held about them in other databases, e.g. NHS and education databases. Data linkage research uses extensive and rigorous anonymisation and data security techniques to ensure anonymity for research participants.

How do we collect personal information?

- The survey is managed by Ipsos MORI (the data processor) on behalf of Cardiff University (the data controller).
- Schools organise delivery of the survey, following guidance provided by SHRN.
- Students in years 7 to 11 undertake the survey at school under the supervision of school staff. Students in years 12 and 13 may also take part if the school wishes.
- The survey is carried out online and completed on computers or tablets.
- Questions that collect identifiable information (name, date of birth and postcode) are at the end of the survey and students can opt not to complete them if they choose.

How do we use personal information collected?

Under data protection law we have to specify the legal basis that we are relying on to process your personal data. In providing your personal data for this research we will process it on the basis that doing so is necessary for our public task for scientific and historical research purposes in accordance with the necessary safeguards, and is in the public interest. The University is a public research institution established by royal charter to advance knowledge and education through its teaching and research activities. Our charter can be found on the Cardiff University website.

How do we store personal information collected?

Data are collected by Ipsos MORI and then securely transferred to Cardiff University.

Personal information is stored in a restricted access folder on a secure university server, protected against unauthorised access by user authentication and a firewall. Identifiable information is stored in a password protected file within the folder.

There are no paper copies of the personal information, including the identifiable information.

Who do we send personal information to?

Cardiff University will share the survey data with Welsh Government, Public Health Wales and other academic researchers for the purposes of this research. Data shared with these third parties will not include the identifiable data, i.e. it will be anonymous. Welsh Government and Public Health Wales will use the data for public health surveillence, policy monitoring and evaluation, and health

programme planning. Other academic researchers may apply to Cardiff University to use the data (excluding the identifiable data) for health and wellbeing research.

Identifiable data is only sent to a trusted third party, via secure file transfer, as part of the data linkage research process. The trusted third party sees only the identifiable information (name, date of birth and postcode), not the rest of the data from the questionnaires. They use the personal information to create an anonymised code for each participant that is then used to anonymously link their survey answers to data from other sources, e.g. health or education records.

Personal identifiable data will not be shared outside the European Economic Area.

How long do we store personal information?

After seven years your personal data will be anonymised meaning we will remove any identifiers that can identify you from the data you have provided. This anonymised personal data may be kept indefinitely or published in support of the research. Other personal data we may have collected, such as your consent to participate in the study, will be kept for 15 years, in accordance with the University Records Retention Schedules.

Right to complain

Cardiff University is the Data Controller and is committed to respecting and protecting your personal data in accordance with your expectations and Data Protection legislation. The University has a Data Protection Officer who can be contacted at inforequest@cardiff.ac.uk. Further information about Data Protection, including your rights and details about how to contact the Information Commissioner's Office should you wish to complain, can be found at the following:

https://www.cardiff.ac.uk/public-information/policies-and-procedures/data-protection

Individual rights

You have a number of rights under data protection law and can find out more about these on our website.

https://www.cardiff.ac.uk/public-information/policies-and-procedures/data-protection

Note that your rights to access, change or move your personal data are limited, as we need to manage your personal information in specific ways in order for the research to be reliable and accurate. If you withdraw from the study, we will keep the information about you that we have already obtained. To safeguard your rights, we will use the minimum personally identifiable information possible.

Document date: September 2019