

Privacy Notice for the Reflective Fostering Programme Study

1. Who we are

The Anna Freud Centre ('we', 'our', 'us'), also known as the Anna Freud National Centre for Children and Families, is a registered mental health charity. The Reflective Fostering Programme Study is group-based intervention for foster carers of children aged four to thirteen years. The Programme aims to support children in foster care by promoting what is known as "reflective parenting". The University of Hertfordshire and University College London are the joint data controllers for this data processing.

This notice informs you how we may use the personal data we collect about research participants ('you'). If you have any questions about the content of this notice you can contact us at:

- Sheila Redfern (Sheila.redfern@annafreud.org)_Anna Freud National Centre for Children and Families, 4-8 Rodney Street, London N1 9JH.
- ReflectiveFostering@annafreud.org
- Contact phone number: 020 7794 2313

Our Data Protection Officer is Rachel Hart, DPO@annafreud.org 020 7794 2313

We are working with additional organisations, named here, who are data Controllers of your data. University of Hertfordshire and University College London.

2. Purpose of the processing and the lawful basis for the processing

We are collecting your personal data to enable us to carry out this research study to contribute to the improvement of the wellbeing of children in care. The information you provide will be used to improve our understanding of the Reflective Fostering Programme and evaluate its effectiveness.

Our lawful bases for processing this data are:

Art 6 1 (f) Legitimate interests: the processing is necessary for our legitimate interests.

We process Special Category data relying upon

Art 9(2)(j) Archiving, research and statistics (with a basis in law) [research purposes] and Sched 1 Part 1 (4) DPA (2018) Research

3. How we get information

We use information collected directly from you via the expression of interest form and the study database.

We may receive some information from other organisations. Should a foster child in your care move placement, we will ask your Local Authority or Independent Fostering Agency to follow up with the child's new carer to seek their consent to complete follow up measures. These details would then be sent to us directly from the carer or via the LA or IFA.

4. Who we share your data with

The data we process is shared between UCL and UOH. This sharing is conducted with a contract in place, governing how each recipient may use the data. Access to the study database, which contains some of your data, is set by role within the study. The Site Coordinator at the Anna Freud Centre, Research Assistants, Research Officers, the Trial manager and designated members of the database team will have access to identifiable data. The designated statistician for the study will have access to pseudonymised and anonymised data.

We do not use third parties to process the data and we do not share it with third parties for other purposes, including direct marketing.

Generally, we will ask your permission before we share your data, but in some circumstances, we are legally obliged to share information, for example under a court order. Where we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

5. How long we retain your data

Your personal data that is collected during this study is held during the term of the study and will be destroyed within 12 months of the study end date. Video files will be retained for 5 years. After which we review it before secure disposal.

Anonymised data will be kept for up to 10 years after the study has completed. After this the data will be securely destroyed.

6. Your data rights

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the [Information Commissioners website](#) for more detail or contact the DPO.

- **Your right to be informed** – this notice informs you what data we collect and how we use it.
- **Your right of access** – You have the right to ask us for a copy of your personal information.

- **Your right to rectification** - You have the right to ask us to correct information which you think is inaccurate or incomplete.
- **Your right to erasure** - This is known as the 'right to be forgotten' and you have the right to ask us to erase your personal information in certain circumstances, such as where it is no longer required. <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>
- **Your right to restriction of processing** - You have the right to ask us to limit the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the right to request we stop processing some or all of your data.
- **Your right to data portability** - This only applies to information you have given us and where we rely upon your consent to process the data.
- **Rights around automated decision making and profiling**

You are not required to pay a charge for exercising your rights. We generally have one month within which to respond to your request.

Please contact us at DPO@annafreud.org if you wish to make a request with regard to any of your rights.

7. Ethics Consent

In addition to these data protection rights we also consider your ethical rights. This evaluation has been approved by the University of Hertfordshire Health, Science, Engineering and Technology Ethics Committee with delegated authority and as part of that approval process we are required to have your consent for your participation in this evaluation.

If you, at any time, want to withdraw from the evaluation we will respect that decision and cease to use your data. You can contact us using the contact details included at the top of this notice to make such a request.

8. Making a complaint

If you feel we may not be handling your data appropriately or if you have any queries or concerns about this you can contact us, dpo@annafreud.org

You can also, at any time, make a complaint about our processing of your data to the Information Commissioner, <https://ico.org.uk/global/contact-us>

9. Obligation to provide data and automated decision making

There is no legal or statutory obligation for you to provide the data, however we only ask for the minimum information we need to provide an appropriate service to you. If we don't have the full detail required we may not be able to do this.