

# Privacy Notice – LEAP Data Platform

Dated 1<sup>st</sup> February 2020



This is a privacy notice for the Lambeth Early Action Partnership (LEAP) and relates particularly to the Data Platform that manages the information on service usage and prepares it for evaluation. Other organisations that deliver services as part of the LEAP programme will have their own privacy notices.

## What is LEAP?

We aim to transform the lives of babies, young children and their families in the four Lambeth wards of Coldharbour, Stockwell, Tulse Hill and Vassall.

Funded by the National Lottery Community Fund, we are part of 'A Better Start', a programme that supports families from pregnancy until children reach the age of four.

We offer interventions for parents and early-years professionals, focusing on three areas that play key roles in a child's early development:

- social and emotional development;
- communication and language; and
- diet and nutrition.

## LEAP Partner Organisations

We are a partnership hosted by the National Children's Bureau (Registered in England and Wales No. 952717; Registered Charity No. 25885; Registered with the Information Commissioner's Office No. Z7988835).

Our partners include Lambeth Council, Lambeth Clinical Commissioning Group and public health and local NHS trusts, as well as local voluntary organisations, community groups, parents, schools, nurseries, statutory organisations and local police leaders. You can find out more about us at [www.leaplambeth.org.uk](http://www.leaplambeth.org.uk)

In order to provide the best service possible and to ensure that our clients get the best out of the services offered by LEAP we will capture some personal data about them and their family.

## What information do we hold?

We gather information from our services, to look at how you and other families benefit from the programme. It is important that we receive this information so that we can do everything we can to benefit families, and better understand how to give children the best start in life.

The information will depend on reporting and evaluation needs at the time. It usually includes information such as the reference number used by the service, your and your child's postcode, age or date of birth, ethnic background and, if appropriate, information about any disability you may have. Individual services will also share information about how you have used the service, such as the number of sessions you have attended and what difference this has made to you.

## How we collect your data

We collect data from the LEAP partner organisations that deliver the LEAP services. A formal agreement between LEAP and these organisations guide how we share information, this makes sure that only essential information is shared. This agreement is reviewed regularly.

## How we store and protect your data

Data is submitted to LEAP using a restricted portal and saved to a secure cloud-based system, provided by Lambeth Council, with limited and protected user access. Where this data includes personal information and was shared by an NHS trust partner they will de-identify (pseudonymise) it before sharing. For other partners we will immediately de-identify (pseudonymise/anonymise) the Personally Identifiable Information (PII) when we receive it preserving all service user's privacy, deleting any information that could identify an individual (for example, names and full addresses). This allows us to store the data in order to analyse the impact of the LEAP services without holding any identifiable personal information.

The data will reside within data centres in the European Union as part of Microsoft's Azure public cloud. The level of protection for the rights of data subjects are the same as for the UK.

A very limited number of people have access to the obscured information. This includes those who are authorised to run analytics over the data and a limited number of approved individuals who administer the data platform. All information is stored securely and held in the strictest confidence.

### **How the data is used**

Our monitoring and evaluation teams, who may be supported by carefully selected external specialist organisations, use the de-identified information to understand how services improve the development and well-being of children in our community, and which services, or combination of services, have the greatest impact, in order to share learning.

In addition, we use the information to prepare anonymised reports for us, our partners and our Funder, the National Lottery Community Fund. We do not publish any information that could identify any individuals.

### **Legal basis**

For services delivered by NHS trust partners we are using legitimate interest, provided by Article 6e and Article 9h of GDPR. Other services will be using consent as a legal basis for processing this information. Consent for us to collect and process data requires a positive opt-in by service users and all non-NHS related LEAP services will ask for this consent.

### **Objecting to the use of personal information**

Service users have the right to object to the sharing of information with LEAP by NHS trust partners. Service users wishing to object should contact the LEAP service(s) to which they are registered or the relevant NHS trust.

### **Opting out of the use of personal information**

Service users have the right to opt out of LEAP receiving their information. The process for opting out will depend on what the specific data is and what LEAP service it relates to as this right does not apply to NHS related services. Service users wishing to withdraw consent should contact the LEAP service(s) to which they are registered.

### **Accessing information or further queries**

Service users have the right to see and access the information that is held about them. Such a request should be directed to the LEAP service(s) to which they are registered. If you would like further information on the rights that service users have with respect to the information stored or have any concerns about any of the details in this notice, please contact [DataProtection@ncb.org.uk](mailto:DataProtection@ncb.org.uk).

Further information and independent advice can be found on the Information Commissioner's website. NCB's Privacy Notice can be accessed at <https://www.ncb.org.uk/privacystatement>

### **Data Retention**

The retention period is expected to be at least the end of the LEAP programme which is due to end in 2025. At the end of the LEAP Programme one of the partners may take on the LEAP data platform as a legacy to develop the learning further, in which case the data will be further retained but for no longer than 25 years.