



GDPR Compliance Statement (For Adults)

HAPPEN is a research project based within Swansea University. HAPPEN is governed by all Swansea University policies and procedures. Swansea University is the Data Controller and is committed to protecting the rights of individuals.

Participants are asked for their permission to complete the survey, and parents/guardians are informed about the survey and the option to withdraw their child (via our opt-out form on our website or by contacting their school), if they wish.

This Privacy Statement relates to the collection, handling and storage of data we obtain from schools, children and parents who give data to HAPPEN Wales. The HAPPEN Network Wales is committed to protecting your privacy and complies with the principles of the relevant data protection regulations.

We are committed to ensuring that your data is handled properly and any information we hold is stored securely and used in a lawful and ethical way.

This privacy policy explains:

- What data we collect;
- On what grounds we hold your personal data;
- How it would be used;
- How long we hold it, and;
- Where it would be stored.

This Statement does not relate to the anonymised data utilised in HAPPEN projects and that held within the SAIL Databank. For more information on how SAIL accesses, stores and manages de-identified data for research visit <https://saildatabank.com/saildata/data-privacy-security/>

1. What data does HAPPEN collect and how will it be used?

1.1 Schools:

The name and address of schools including the email address and contact number of appropriate staff is processed under Article 6(1)(b) *performance of contract* in order for us to contact schools as members of the network.

In addition, we may contact schools to inform them of network events. This information is processed under Article 6(1)(f) *legitimate interest* which enables internal communications on matters relating to HAPPEN.



1.2 Permission from children to participate in the survey:

This information is processed to ensure that HAPPEN uses data only from those children who are happy to participate in the survey and have given permission at the start of the survey. All children are eligible to take part in the survey unless their parents have opted-out via the information sent out by their school. The following personal information will be held; 1) name and, 2) school name.

The data collected in relation to permission to participate in the survey (including data in relation to opt-out) will be held under legitimate interests (under Article 6(1)(f)), this is to ensure only those children who wish to take part in the survey are given access.

1.3 Parents who contact us:

Personal data of parents who contact us is processed under Article 6(1)(f) *legitimate interest*. In order for HAPPEN to make contact with parents upon request, the following personal data will be held; 1) name of child, 2) name of parent and, 3) name of school.

1.4 Self-reported data from children:

Personal data collected as part of the survey includes self-reported health data such as diet, physical activity and well-being questions. This data is collected when children give permission to take part in the survey and if their parents have not opted-out. The lawful basis under which we will process personal data for research is *Article 6(1)(e) processing is necessary for the performance of a task carried out in the public interest*. For special category data, the condition we are relying on is *Article 9(2)(J) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) safeguards*. This is supplemented by *Schedule 1, Part 1, Paragraph 4(a)(b)(c) of the Data Protection Act 2018 where processing is necessary for Research*.

Personal data is collected using MS forms which is subject to GDPR. The data is held in an pseudonymised form and anonymised data is not subject to GDPR.

2. Who receives your information and how long will it be held for?

Data provided to HAPPEN is not passed on to any third party. Your data will be used solely to comply with our information governance requirements and for the purpose of evidencing permission for survey participation or contact as members of the network.



The self-reported health and well-being data is used to give reports to schools and local government. These reports only give anonymised and aggregated data, and no individual is included in reports. The identifiable information given in the HAPPEN survey (name, postcode) are held for 12 months and then are deleted. If your child wants to withdraw or membership before this date, all the data will be destroyed.

2.1 Our security and your data

We are committed to keeping your data secure. Any data you provide to us will be held only on secure servers owned and administered by Swansea University which are subject to suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect.

2.2 Accessing and updating your data

You can change your mind at any time about how we contact you, how we process your data, or ask us to stop contacting you please get in touch with: happen-wales@Swansea.ac.uk

We will be proactive in keeping our records up to date and will aim to action all changes to communication preferences within 7 working days.

2.3 Consequences of not providing the data when based on statutory or contractual requirement

HAPPEN will not be able to engage with schools where the required data is not provided as members of the network.

3.0 Your data and your rights

The General Data Protection Regulation (GDPR) and Data Protection Act 2018 strengthen and add to individuals' rights and HAPPEN is committed to supporting these rights. You have a right to access your personal information, to rectify, to erase, to restrict and to port your personal information. Swansea University has a Data Protection Officer who can be contacted through dataprotection@swansea.ac.uk

Any requests or objections should be made in writing to the University Data Protection Officer:

University Compliance Officer (FOI/DP)
Vice Chancellor's Office



Swansea University
Singleton Park
Swansea
SA2 8PP

4.0 How to make a complaint

If you are unhappy with the way in which your personal information has been processed you may in the first instance contact the University Data Protection Officer using the contact details above. If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: –

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

Additional information

If you would like to know more about our data processing, or have any queries regarding the content of this notice then please contact us on happen-wales@Swansea.ac.uk - we will be happy to provide you with any further information that you require.

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This notice was last updated on 14/05/2024