



William Henry Smith Foundation

Privacy Notice Policy

Policy Details

Status:	In-house
Frequency of review:	Annually
Lead member of staff:	Sarah Kaler
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Next Review Date:	Spring 2027
Policy Number:	FWS46

1.0 Introduction

The William Henry Smith Foundation (“We”) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting this website, you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation 2018, the data controller is The Head of Central Services, The William Henry Smith Foundation, Boothroyd Lane, Rastrick, HD6 3JW, a charity registered with the Charity Commission for England and Wales with registered number 529132.

Our Data Controller for the purpose of the Act is Lisa King.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- **Information you give us:** This is information about you that you give us by filling in forms on the website www.whsschool.org.uk. The information you give us may include your name, e-mail address and phone number.
- **Information we collect about you:** This is information that we collect automatically about your visit during your time on the Site. It typically involves technical information and is often collected using small data files called “cookies”. This information helps us to provide you with a good experience when you browse the Site and also to indicate where the Site requires improvement.
- **Information we receive from other sources:** This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share your data. This also includes information that we receive from business partners, sub-contractors in technical, advertising networks, analytics providers etc. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to notify you about changes to our service;
- to administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep the Site safe and secure;
- to comply with our record keeping and information storage obligations and policy (please see the “Disclosure of your information” section below);

- The Development and Alumni Relations office may conduct wealth screening and research via a third party to help us understand our alumni and donors and to gain an insight into their philanthropic interests and to gauge their ability to support The William Henry Smith School.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We will disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or
- to protect our rights, property, or safety, or those of our parents, pupils, or others.

No disclosure or transfer of your information will be to persons or entities outside of the European Economic Area (EEA).

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers within the EEA in accordance with our data retention policy and we will take reasonable steps to protect your information in accordance with this policy, including without limitation:

- installing a secure firewall;
- using antivirus protection software;
- encrypting data;
- carrying out regular backups.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the following rights under law in respect of your personal information:

- the right to be informed about the collection and use of your personal information;
- the right of access to your information to verify the legality of our use of it;
- the right to request that inaccurate or incomplete information about you is rectified;

- the right to request the deletion or removal of your information where there is no further reason for us to use it (such as you have withdrawn your consent or we no longer provide your children with education);
- the right to restrict the use of your information;
- the right to obtain and reuse the information that we have about you for your own purposes;
- the right to object to certain uses (such as for marketing purposes); and
- the right not to be subject to a decision that has a legal effect on you that has been based on an automated decision.

Should you wish to exercise any of these rights, you may do so at any time by writing to us at the address given below.

If you feel that your rights have been breached in any way, you should contact Head of Central Services or lodge an official complaint with the Information Commissioner's Office via their website (<https://ico.org.uk>) or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

The Site may, from time to time, contain links to and from the websites of our partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Lisa King, Data Controller at the The William Henry Smith Foundation or lisa.king@whsfoundation.org.uk

If you have any questions about this notice, please contact our Head of Central Services or alternatively, our DPO:

External Data Protection Officer: Judicium Consulting Limited
 Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
 Email: dataservices@judicium.com
 Web: www.judiciumeducation.co.uk
 Telephone: 0345 548 7000 opt 1, then opt 1

Privacy Notice Parents/Carers (How we use student information):

Privacy Notice for Parents/Carers

Under UK data protection requirements, General Data Protection Regulation (GDPR) and Data Protection Act 2018, individuals have a right to be informed about how the school uses any personal data. The school complies with this requirement by providing 'privacy notices' (sometimes called 'fair processing notices') to inform individuals about how their personal data will be processed.

This privacy notice explains how the school collects, stores and uses personal data about students and their families.

Who processes your information?

The William Henry Smith Foundation is the data controller of the personal information provide. This means the school determines the purposes for which, and the manner in which, any personal data relating to students and their families is to be processed.

In some cases, personal data processing will be outsourced to a third-party; however, this will only be done with your consent, unless the law or our policies allow the school to share your data. Where the school outsources data to a third-party processor, the same data protection standards that the school upholds are imposed on the processor.

Why does the school collect personal data on students?

The William Henry Smith Foundation has the legal right to collect and use personal data relating to students and their families, and it may also receive information regarding them from their previous school, Local Authority (LA) and/or the Department for Education (DfE). The school will collect and use personal data in order to meet legal requirements and legitimate interests set out not only in the UK data protection requirements but also:

- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

In accordance with the above, the personal data of students and their families is collected and used for the following reasons:

- a) To support student learning
- b) To monitor and report on student attainment progress
- c) To provide appropriate pastoral care
- d) To assess the quality of our services
- e) To keep children safe (food allergies, or emergency contact details)
- f) To meet the statutory duties placed upon us for DfE data collections
- g) To facilitate school trips and activities
- h) To provide counselling services as required
- i) To safeguard students

Whilst the provision of the majority of personal data is mandatory, some of it is provided to the school on a voluntary basis. In order to comply with the UK data protection requirements, the school will inform you whether you are required to provide certain information or if you have a choice.

What data is collected?

The categories of student information that the school collects, holds and shares include but are not restricted to the following:

- Personal identifiers and contacts (such as name, unique student number, contact details and address) characteristics (such as ethnicity, language, and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Special and Additional educational needs (including the needs and ranking)
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, number of absences and absence reasons)
- Assessment and attainment (such as key stage 2 and 3 results, post 16 courses enrolled for and any relevant results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Trips and activities (dietary needs, medical needs and history and in some cases for overseas trips - passport numbers, birth certificates and divorce and marriage certificates for visas)
- Catering (free school meal entitlement and purchase history)
- ID Management (photographs and names for identification badges)
- Biometric information (door entry)
- CCTV footage (safety and security)

When collecting data, the school will inform you if your consent is needed. Where consent is required, the school will provide you with specific and explicit information with regards to the reasons the data is being collected, how the data will be used and how consent can be withdrawn.

The lawful basis on which the school will use personal data

The school will use a lawful basis to collect and use personal data. Most commonly, the school will use it where it needs to:

- comply with a legal obligation
- perform an official task in the public interest

Less commonly, the school may also process personal data in situations where:

- you have given consent to use it in a certain way
- the school needs to protect the individual's vital interests (or someone else's interests)

Some of the reasons listed above for collecting and using personal information overlap, and there may be several grounds which justify the school's use of your data.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing student information are:

Legal Obligation: Article 6(1)(c) of the GDPR for any statutory processing which is necessary for compliance with a legal obligation to which the we are subject. This relates to tasks (e) (f) and (g) and includes the following statutory guidance:

The William Henry Smith Foundation has the legal right to collect and use personal data relating to students and their families, and it may also receive information regarding them from their previous school, Local Authority (LA) and/or the Department for Education (DfE). The school will collect and use personal data in order to meet legal requirements and legitimate interests set out not only in the UK data protection requirements but also:

- Section 537A of the Education Act 1996
- The Education Act 1996 S29(3)
- The Education (School Performance Information) (England) Regulations 2007
- Regulations 5 and 8 School Information (England) Regulations 2008
- The Education (Student Registration) (England) (Amendment) Regulations 2013
- Education and Skills Act 2008
- DfE Keeping Children Safe in Education Guidance 2016
- DfE Working Together to Safeguard Children (2015)
- The Management of Health & Safety at Work Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005 England and Wales
- Health and Safety at Work Act 1974
- The Disability Discrimination Act 1995

‘Public Task’: Public interest or in the exercise of an official authority vested in us Article 6(1)(e) of the GDPR. This relates to tasks (a) (b) (c) (g) and (h). This includes any process which is for necessary for the exercise of a task we have termed our ‘Statement of Public Task’, which is based on The curriculum requirements of section 78 of the Education Act 2002: Statement of Public Task: "To deliver a balanced and broadly based curriculum which - promotes the spiritual, moral, cultural, mental and physical development of students at the school and society, and prepares students for the opportunities, responsibilities and experiences of later life. This includes school trips and activities; and where appropriate counselling services". In addition, concerning any special category data we use Article 9(2)(g) of the GDPR and Schedule 1 Part 2 of the Data Protection Act 2018 in relation to statutory and government purposes, equality or opportunity of treatment and counselling.

Vital Interests: Article 6(1)(d) of the GDPR. Where the vital interests of a child are at risk we will use Vital Interests as a lawful basis. This relates to task (i). Where a vital interest is protected we will use Article 9(2)(c); and Article 9(2) (h) and (i) for the purposes of a medical diagnosis or reasons of public health.

If we need to seek consent, we will obtain this under Article 6(1)(a) Consent and section 9(2)(a) Explicit Consent for Special Category Data.

How we collect student information

We collect student information via:

- Data Collection Sheet at the start of each academic year
- Common Transfer Form (CTF) which is a secure file containing relevant information sent to us from the child’s previous school.

Student data is essential for the schools' operational use. Whilst the majority of student information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain student information to us or if you have a choice in this.

Storing personal data

Personal data relating to students at The William Henry Smith Foundation and their families is stored in line with the school's Data Protection Policy which can be found on the school website.

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. For example, the school will shred or incinerate paper-based records and override electronic files. The school may also use an outside company to safely dispose of electronic records.

Why the school may share student information?

The school is required to share students' data with the DfE on a statutory basis.

The National Pupil Database (NPD) is managed by the DfE and contains information about students in schools in England. The school is required by law to provide information about our students to the DfE as part of statutory data collections, such as the school census; some of this information is then stored in the NPD. The DfE may share information about our students from the NPD with third parties who promote the education or wellbeing of children in England by:

- conducting research or analysis.
- producing statistics.
- providing information, advice or guidance.

The DfE has robust processes in place to ensure the confidentiality of any data shared from the NPD is maintained. The school also routinely shares students' information with:

- Schools that the pupil's attend after leaving us
- Our Local Authority
- The Department for Education (DfE)
- Ofsted
- Colleges and External providers attended by the students
- Work Experience providers
- Social Workers
- Police
- Any agencies involved with student/family
- CAMHS
- Medical Professionals
- YOT
- Future schools
- Exams Boards
- Family Support Team
- Back up companies (IT/Microsoft)

- Specialist Tutors bought in by School as required i.e languages, music, literacy and numeracy etc

How Government uses your data

The student data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- Informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Student Progress measures).
- Supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

Aged 14+ qualifications

For pupils enrolling for post 14 qualifications, the Learning Records Service will give us a pupil's unique learner number (ULN) and may also give us details about the pupil's learning or qualifications

Why we share student information

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We share students' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our students with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Students) (England) Regulations 2013.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our students with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under:

- Section 537A of the Education Act 1998
- The Education Act 1996 S29(3)
- The Education (School Performance Information) (England) Regulations 2007
- Regulations 5 and 8 of School Information (England) Regulations 2008

- Regulation 5 of The Education (Information About Individual Students) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework. For more information, please see 'How Government uses your data' section.

Sharing by the Department

The law allows the Department to share students' personal data with certain third parties, including:

- Schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 students per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided student information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfeexternal-data-shares>

Youth support services

What is different about students aged 13+?

Once our students reach the age of 13, we also pass student information to our local authority and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- Youth support services
- Careers advisers

A parent/guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child/student once he/she reaches the age of 16.

Our pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- Post 16 education and training providers
- Youth support services
- Careers advisers

For more information about services for young people, please visit our local authority website.

The school also uses various systems, such as assessment and reporting software, communication systems and curriculum software that may process pupil and family information. As the data controller the school will ensure that processors meet and uphold the required data protection standards. An up-to-date list of these third parties can be found on the school website.

Parent and pupil rights regarding personal data

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the school holds about them. Parents/carers can make a request with respect to their child’s data. Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if the school does hold information about you or your child, the school will:

- give you a description of it
- tell you why the school is holding and processing it, and how long it will be kept for
- explain where the school got it from, if not from you
- tell you who it has been, or will be, shared with
- let you know whether any automated decision-making is being applied to the data, and any consequences of this
- give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a subject access request please contact Lisa King, Head of Central Services on 01484 710123.

Parents/carers also have a legal right to access to their child’s educational record. To request access, please contact the school office...

Other rights regarding personal data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of personal data if it would cause, or is causing, damage or distress

- object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the Lisa King, Head of Central Services via the school office.

Complaints

We take any complaints about the collection and use of personal information very seriously. If you think that the collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about data processing, please raise this with the school in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5A

Where can you find out more information?

If you would like to find out more information about how we use and store your personal data, please visit our website www.whsschool.org.uk to view our Data Protection Policy.

To find out more about the pupil information the school shares with the DfE, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Privacy Notice for the School Workforce

Under UK data protection requirements, individuals have a right to be informed about how the school uses any personal data. The school complies with this requirement by providing 'privacy notices'

(sometimes called ‘fair processing notices’) to inform individuals about how their personal data will be processed.

This privacy notice explains how the school collects, stores and uses personal data about individuals employed, or otherwise engaged, at the school.

Who processes your information?

The William Henry Smith Foundation is the data controller of the personal information provided to us. This means the school determines the purposes for which, and the manner in which, any personal data is to be processed.

In some cases, personal data processing will be outsourced to a third-party; however, this will only be done with your consent, unless the law or our policies allow the school to share the personal data. Where the school outsources data to a third-party processor, the same data protection standards that the school upholds are imposed on the processor.

Why does the school collect personal data on its workforce?

The purpose of collecting and processing this data is to help in the running of the school, including to:

- Enable staff to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Improve the management of workforce data across the sector
- Enable development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring

Whilst the provision of the majority of personal data is mandatory, some of it is provided to the school on a voluntary basis. In order to comply with the UK data protection requirements, the school will inform you whether you are required to provide certain information or if you have a choice.

What data is collected?

The categories of staff information that the school collects, holds and shares include, but are not restricted to:

- Personal information (such as name, employee or teacher number, national insurance number)
- Special categories of data (such as characteristics information such as gender, age, ethnic group)
- Contract information (such as start dates, hours worked, post, roles, DBS, Right to Work in the UK and salary information)
- Work absence information (such as number of absences and reasons)
- Medical/injury information
- Qualifications and employment records (including work history, job titles, working hours, training records and professional memberships)
- bank details

- photographs and videos
- CCTV footage
- data about your use of the school's information and communications system

When collecting data, the school will inform you if your consent is needed. Where consent is required, the school will provide you with specific and explicit information with regards to the reasons the data is being collected, how the data will be used and how consent can be withdrawn.

The lawful basis on which the school will use personal data

The school will use a lawful basis to collect and use personal data. Most commonly, the school will use it where it needs to;

- Fulfil a contract entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, the school may also use personal data where:-

- You have given us consent to use it in a certain way
- The School needs to protect your vital interests (or someone else's interests)

Some of the reasons listed above for collecting and using personal information overlap, and there may be several grounds which justify the school's use of your data.

Storing personal data

The school will create and maintain an electronic employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment. Once your employment has ended, the school will retain this file and delete the information in accordance with our data retention policy.

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. For example, the school will shred or incinerate paper-based records and override electronic files. The school may also use an outside company to safely dispose of electronic records.

Why the school may share workforce information

The school does not share personal data with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) the school may share personal data with:

- The Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.
- The Local Authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about Principals performance and staff dismissals
- DBS
- Westfield Health (The School's employee health assistance scheme provider)

- SAGE payroll
- The School's Occupational Health advisors (when necessary)
- The School's external IT provider who maintain our HR database and also any company the School contracts to back up IT data to the cloud.
- The School's external HR advisors and ACAS (when necessary)
- GP's and School Nurse (where applicable)
- Cycle Scheme (where applicable)
- Child Care Nursery Providers (where applicable)

The school also uses various systems, such as assessment and reporting software, communication systems and curriculum software that may process personal data. As the data controller the school will ensure that processors meet and uphold the required data protection standards. An up-to-date list of these third parties can be found on the school website.

Your rights

How to access personal information the school holds about you

Individuals have a right to make a '**subject access request**' to gain access to personal information held.

If you make a subject access request, and if the school does hold information about you, the school will:

- give you a description of it
- tell you why the school is holding and processing it, and how long it will be kept for
- explain where the school got it from, if not from you
- tell you who it has been, or will be, shared with
- let you know whether any automated decision-making is being applied to the data, and any consequences of this
- give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a subject access request, please contact the DPO via the school office.

Other rights regarding personal data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of your personal data if it would cause, or is causing, damage or distress
- object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the DPO via the school office.

Complaints

We take any complaints about the collection and use of personal information very seriously. If you think that the collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about data processing, please raise this with Lisa King, Head of Central Services, in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Where can you find out more information?

If you would like to find out more information about how we use and store your personal data, please visit our website www.whsschool.org.uk

If you require more information about how we and/or DfE store and use your personal data please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>