**CWLG – Privacy Statement**

**The Eight Principles of Data Protection**

**1. Fair and lawful**

An organisation must have legitimate grounds for collecting data and it must not have a negative effect on the person or be used in a way they wouldn’t expect. Organisations are required to provide full transparency about how they wish to use the data, as well as ensure their data is only used in ways customers would expect. Detailing precisely what a consumer’s information is being used for allows them to make an informed decision as to whether to share certain pieces of personal information.

*Our Response:* The data collected from participants will be used in accordance with the study being conducted. The data collected will in no way negatively impact the participants and no other participants will be able to access the data that is provided by each. There will be total transparency with regards to the use of collected data, the data collected will only be used for the sole purpose of conducting the study and analysing the results

**2. Specific for its purpose**

Organisations must be open about their reasons for obtaining personal data and what they plan to use it for. They should only use the personal data for the purpose they initially said it would be used for. This means that a company should not use the data to market other companies to their customers unless the individual has agreed to it.

*Our Response:* For contact purposes only, CWLG records accurate personal data which primarily consists of your name and email address. Relevant questions are used to enable CWLG to undertake the feasibility study and this data is collected and stored anonymously. The Group does not collect sensitive personal data, nor does it collect information on religion or political persuasion. Such sensitive data is known in GDPR as special category data.

**3. Be adequate and only for what is needed**

The data you hold on your customers should be adequate for the purpose you are holding the information.

*Our Response:* The Group does not collect sensitive personal data, nor does it collect information on religion or political persuasion. Such sensitive data is known in GDPR as special category data. Participants will remain anonymous in the study and any further published analysis that occurs afterwards.

**4. Accurate and up to date**

Reasonable steps must be taken to keep the information up to date and to change it if it is inaccurate. When a customer updates the information, a company holds on them, the organisation must stop contacting the individual using the previously provided details. Moreover, organisations should not simply wait for individuals to contact them to update their information, rather they should be active in ensuring they have the correct information on an individual.

*Our Response:* All information on participants has been checked before the beginning of the study and will be checked and kept up to date on a regular basis during the study. As the personal information in minimal we do not foresee and significant changes to participants information

**5. Not kept longer than needed**

Organisations must regularly review the length of time they retain data on individuals. Only holding on to data for the amount of time required will make it easier to manage your data and provide personal information to customers that request it. Data that is out of date or no longer necessary must be properly destroyed or deleted.

*Our Response:* Minimal information such as contact details will be stored for the purpose of the study. This information will not be shared with anyone without the permission of the participant. The data will be maintained in the database for the length of the Feasibility programme and subsequent study.

**6. Take into account people’s rights**

People have the right to access their personal data, stop it from being used if it is causing distress, prevent it from being used for direct marketing, have inaccurate data changed, and claim compensation for damaging data breaches. In certain cases, customers have the right to request that specific data be deleted or destroyed. Customers should only request information relevant to themselves. The organisation has a responsibility to establish whether the information requested by customers is relevant to the person requesting it.

*Our Response:* The participants have the right to submit a complaint. In the first instance this should be made to the CWLG group. If there is a mistake in the data recorded, then the Group will be happy to update its records. Participants reserve the right to request removal from the survey at any point. The Group will not be able to release personal data about participants, even a telephone number or email address, without the relevant participant’s permission.

**7. Kept safe and secure**

A proper physical and technical security system must be used to keep personal information safe and secure, and not be exposed to undue security risks. Further, your information security system should be relevant to the nature of your business and the data you hold on your customers.

*Our Response:* The only members of CWLG that will have access to raw data in the feasibility study are Kathryn Spinks-Dear and Thomas Mak. All data will be stored on a secure encrypted system that only the two-research assistance will have access to. Both agree that no information will be shared with any other participant or member of the CWLG. In the case that the two are no longer able to carry out their duties, them Margaret Ellis will take over access to the data.

**8. Data to not be transferred outside of the EEA**

Data should not be transferred to other countries that do not have the same level of data protection.

*Our Response:* The Group does not knowingly transfer your data outside the EEA and requires all its suppliers not to make such transfers.

**Plan for the Protection of Data – Research Assistance**

**Transparency** – All data will be collected with the permission of the participants, no sensitive information will be collected or stored. The research assistants will only use the information for the purpose of the study and no longer have access to it once the study has concluded. Participants reserve the right to stop participation in the study at any point. Research assistants are there to process and analyse data, if any participant has a complaint this should be directed to the CWLG Group.

**Security** – The research assistants will collect the information on an encrypted platform that only themselves will have access to. The data will be stored on an encrypted online platform that removes the risk of accidental deletion, as a safety precaution the data will be stored in two places. In the case of both of the research assistants being unable at continue with the study, then access to the raw data will be passed on to Margaret Ellis.

**Anonymity** – Participant personal data will not be shared with anyone other than the two research assistants, who themselves agree to not share any participant data with anyone else. No participant will be able to see another participant’s questionnaire responses and participants names will not be published in the final evaluation report