

# Piloting an image-based mental health measure for young people

## Privacy notice for parents/carers

This note is to explain what we do with the information that you and your child share with us as part of this research project and your rights about our use of that information. These rights are set out in the General Data Protection Regulation (GDPR) and the Data Protection Act (2018), which tell us what we must do by law.

### 1. Who we are

Anna Freud is conducting a pilot study of an image-based mental health measure for young people. This notice informs you how we will use personal data collected for the purposes of conducting this research project. If you have any questions about the content of this notice, then you can contact us at:

- Prof Julian Edbrooke-Childs: [julian.edbrooke-childs@annafreud.org](mailto:julian.edbrooke-childs@annafreud.org)
- Write to us: Anna Freud National Centre for Children and Families, 4-8 Rodney Street, London N1 9JH
- Our Data Protection Officer (DPO) is Rachel Hart: [DPO@annafreud.org](mailto:DPO@annafreud.org)

### 2. Purpose of data (information) processing and the lawful basis for processing

In this study, we would like to find out if the measure works how we intend it to, if it is reliable, and if it is practical and easy to use.

If you give your consent for your child to take part in this study, then we will hold up to four types of personal information provided by you and your child:

- Your name, your child's name, and your contact details
- Your child's age, gender, ethnicity, and SEND status
- Your child's questionnaire responses
- Audio recordings of your child's discussion responses (if they take part in a discussion)

Anna Freud are the Data Controller and Data Processor for this study. The UK GDPR basis for processing these data is Legitimate interest, Article 6(1)(f), specifically research purposes (Article 9(2)(j)) and DPA (2018) Schedule 1 part 1 paragraph 4.

This allows us to process personal data for research or evaluation purposes where appropriate care is taken to manage the data securely.

### **3. Who we share data with**

Any audio files that are recorded will be shared with our external transcription service (The Transcription Centre, Grosvenor House, 11 St Paul's Square, Birmingham B3 1RB UK; [www.transcriptioncentre.co.uk](http://www.transcriptioncentre.co.uk)). We have a data sharing agreement in place to do this securely and confidentially.

We will not share data with any other external partners or agencies. Generally, we will ask for your and your child's permission before we share data, but in some circumstances, we are legally obliged to share information, for example under a court order. When we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision-making.

We will not be transferring any identifiable information outside the European Economic Area (EEA). We will be managing the data on IT systems at Anna Freud, based in the UK, and we will be taking appropriate measures to ensure that it always remains secure.

### **4. How long will we retain data**

Your and your child's personal data (e.g., your names, contact details, your child's audio recording) will be held securely until the end of the evaluation (31<sup>st</sup> December 2026) after which it will be securely disposed of. We will retain your identifiable consent forms and the transcript of your child's discussion and their demographic data (which will be anonymised) for research purposes for a minimum of 10 years.

### **5. Your data rights**

Under data protection law, you have rights that 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 Commissioner's website (<https://ico.org.uk/for-the-public>) for more detail or contact Rachel (Anna Freud's DPO). Your rights are:

- The right to be informed
- The right of access
- The right to correct data
- The right to be forgotten
- The right to restrict processing
- The right to data portability

- The right to object to our processing

Please contact us at [DPO@annafreud.org](mailto:DPO@annafreud.org) if you wish to make a request with regard to any of your rights. You are not required to pay a charge for exercising your rights. We generally have one month within which to respond to your request.

## **6. Withdrawal from the study**

If your child no longer wants to participate in the pilot study of the image-based measure of mental health, then they can withdraw at any time until 31<sup>st</sup> August 2026, with no disadvantage to you or them. We will respect that decision and cease processing your and your child's data. You can contact us using the contact details included at the top of this notice to make such a request.

Please note that once we have anonymised the data, it will not be possible to withdraw your child's contributions, so it is best to tell us as soon as possible if you do change your mind.

## **7. Making a complaint**

If you feel that we may not be handling your or your child's data appropriately or if you have any queries or concerns about this, you can contact us at [DPO@annafreud.org](mailto: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>

## **8. Obligation to provide data and automated decision-making**

You can choose for your child to participate in this evaluation, in which case we do require your and your child's data. We do not use profiling or automated decision-making when processing your data for any purpose.