

# FARRER HUXLEY

## Emma Cons Gardens Consultation and Design Process Privacy Notice for Farrer Huxley March 2022

### 1. Who we are

Our contact details

Address: Farrer Huxley, Unit 11, Union Wharf, 23 Wenlock Road, London N1 7SB

Email: [info@farrerhuxley.com](mailto:info@farrerhuxley.com)

ICO: Farrer Huxley is registered with the Information Commissioner's Office with reference number ZA446645

We are part of the "Team" referred to in the Privacy Policy of Commonplace Digital Ltd (viewable on the Team page of this Commonplace). We are working on behalf of the Emma Cons Gardens Steering Group. The Commonplace license is paid for by Lambeth Council, who are part of the Steering Group, but Farrer Huxley is the organisation that has designed the March 2022 survey and who will be analysing the findings. Please note the Summer 2021 survey was designed and analysed by *The Means* and CarverHaggard (their privacy policies can be found on the Teams page of this Commonplace). The survey report is linked through the website:

<https://emmacons.commonplace.is/>

<https://emmacons.commonplace.is/proposals/about-this-project/step1>

We are using this Commonplace to collect views on the future of Emma Cons Gardens. To help us ensure that we are collecting views from a wide variety of people, and to keep people updated about the project, we are also collecting certain pieces of personal information. We are a data controller when you provide this information either through Commonplace or through other formats such as at an engagement event or on a paper survey.

The privacy policies of the other organisations involved in handling data in this consultation are provided separately and this should be read in conjunction with them.

### 2. What we are doing in this consultation

The purpose of this consultation is to gather views from the community about what they would like Emma Cons Gardens to be like in the future. The information gathered during this consultation will be used to support our design work.

### 3. How we are collecting information

You may provide information to this consultation:

- directly through Commonplace, or
- by filling in a survey with one of our staff members in person or over the phone,
- by emailing us with views, or by leaving comments on a paper survey. In this case, the information you provide will be uploaded to the Commonplace site and the paper records will be destroyed once this has happened

### 4. Information we are collecting and why

When you use the Commonplace site or interact with them, they may collect and process certain pieces of data about you or your visit to their platform, which you can learn more about by reading the Commonplace Privacy Policy.

We have asked Commonplace to collect the categories of data outlined in the table below. We may also collect these categories of data through other activities such as paper surveys and engagement events. The table below also outlines our purpose for collecting each category of data. Commonplace's Privacy Policy outlines its own purposes.

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Category of data	Our purpose
Information that you provide by participating, for example your email address.	To ensure that feedback is obtained from real people and so that you can be sent updates about the project that are posted on the Commonplace site.
Your postcode	This helps us to identify which roads/estates have and haven't responded.
Age range	This information helps us identify how many respondents have been reached in different age groups and to test whether we have managed to reach a representative sample of people.
Your gender	
Information about your connection to the area, such as whether you are a resident or a visitor	This information helps us understand the context of your comments and what variety of people we have reached.
Other information about how you use Waterloo and Emma Cons Gardens	This information helps us to understand the context of your comments and what existing uses are important to take into consideration during design work.
Other information about your views on Emma Cons Gardens and its future, as well as any design ideas that are shown	This information will help us to create a design that reflects the community's desires.

## 5. Special Category Data

We may ask Commonplace to ask you for the following special category data:

- Personal data revealing racial or ethnic origin
- Personal data revealing religious identity

We may also be collecting this information during events and from paper surveys.

The purpose for us asking for this data is to help us to understand whether we have reached a diverse range of people during our consultation.

It is not mandatory for you to provide special category data. If you choose to provide special category data via Commonplace you can withdraw your consent to its use at any time by logging into and changing your profile on the Commonplace.

If you provide this information via Commonplace it will be anonymised on collection and once it has been anonymised it cannot be linked to you. If you provide this information to us at an event or on a paper survey you will be provided with a means of providing this separately to other personal information so that it can immediately be anonymised. You should understand that, once it is anonymised, it is impossible to link it to you. This will make it impossible to identify it for the purposes of you exercising your rights in relation to such data.

## 6. Hearing updates about the project and managing your contact preferences

Commonplace will ask you for your email address to stay up to date with this and other projects. Commonplace will hold and manage this information.

If you engage with us at an event or complete a paper survey we will also ask for your contact details for the purposes of keeping up to date with the project. If you provide your contact details then we will upload this information to Commonplace along with the rest of your responses and your email address will then be managed as though you had provided it directly to Commonplace. You will receive updates through the Commonplace app.

You can read Commonplace's privacy policy to learn how to manage your contact preferences.

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## 7. Keeping personal data secure

We will take all steps reasonably necessary to ensure that that your data is treated securely and in accordance with this privacy policy.

Commonplace's privacy policy provides more information about the steps they take to keep your data secure. Their servers where they store personal data are located in London, UK.

## 8. How and why we use information

We will use the information provided during this consultation to:

- Analyse views and inform conversations about the future of Emma Cons Gardens
- Provide a design brief to a designer to work on the future of Emma Cons Gardens
- Provide feedback on what people have said
- To keep the community and respondents up to date with the process

We will analyse the views provided through this consultation and may share our findings with others for the purposes of promoting or progressing the project, such as with members of the Steering Group, funders, or other members of the public. However, this information will be anonymised before sharing.

We may also analyse special category and other demographic data provided through this consultation and may share our findings with others for the purposes of promoting or progressing the project, such as with members of the Steering Group, funders, or other members of the public. However, this information will be anonymised and aggregated before sharing. For example, we may share information such as "61% of respondents to the survey were female".

For each use of personal data, the law requires something that is called a 'lawful basis for processing'. This defines what each use of personal data is for, which category it fits into and why that's allowed.

- Where we need to perform a contract – this is the wording used by the law. It's essentially using your personal data to carry out something we've made a contract with you to do (for example to upload your data to Commonplace)
- Where it's necessary for our legitimate interests – this is where we or a third party have a legitimate interest in using your personal data and your interests or fundamental rights don't override it (for example using your anonymised comments as part of the design process, in a planning application, or to demonstrate a point in a public feedback report). You have the right to object to this processing if you wish, which can be done through your Commonplace profile.
- Where we have your consent to do so – this is where you clearly say to us it's OK to do something
- Where we need to comply with a legal or regulatory obligation – if there's a law that says we need to keep or hand over some personal data, or if someone in authority asks us to, we'll follow the rules.

The table below provides more detail on what we might do and the lawful basis. Commonplace's privacy policy provides more information on data specifically collected by them when you use their site, which we do not collect.

The sort of data we might use	When we might ask you for it	How and why we might use it	The legal basis on which we use it
Your contact details	When you fill in a survey with one of our staff or on paper.	Upload it to Commonplace along with your other responses so that your responses are stored securely, so that you have the ability to manage your preferences via Commonplace and so that you can receive updates	Perform a contract
Your views on Emma Cons Gardens	When you fill in a survey with one of our staff or on paper.	Upload your views to Commonplace to be stored securely. We will use them to assess the	Legitimate interest

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		community's views and to inform future design and planning processes.	
Demographic or special category data	After you have input to the consultation we may ask you to provide this information separately	We will use them to assess how well we have reached a wide cross-section of the community.	Legitimate interest

## 9. How long we will keep your information

We will only keep any personal information we hold for as long as necessary to carry out the purposes for which we collected it. This means keeping your information until a design and planning process is complete for Emma Cons Gardens, or until it has been decided by the Steering Group that the project is no longer viable and will not continue.

## 10. Your rights

Under the General Data Protection Regulations you have the following rights:

- The right to be informed – your right to have us tell you what we do with your personal data
- The right of access – your right to ask us what information we hold about you and how it's used
- The right of rectification – your right to have us correct your personal data if it is inaccurate or incomplete
- The right to erasure – your right to have us delete or remove your personal data where there is no compelling reason for its continued processing (i.e. the 'right to be forgotten')
- The right to restrict processing – your right to ask us to stop actively processing your personal data
- The right to data portability – your right, in certain circumstances, to have your personal data transferred to a third part
- The right to object – your right to object to us processing your personal data where we do not have an overriding reason.

You can read more about your rights at <https://ico.org.uk/your-data-matters/>

You can exercise these rights about any data that we hold about you by contacting [info@farrerhuxley.com](mailto:info@farrerhuxley.com)

When you contact us, we need to be sure it's you. We may need to ask you to confirm your identity. We will try to respond within 30 days, but if your request is complex or you've made a number of different requests it may take us longer, in which case we will keep you posted.

## 11. Contact

You can contact us on [info@farrerhuxley.com](mailto:info@farrerhuxley.com)

## 12. Complaints

If you have any complaints about the way in which we collect, store and use your information, and these have not been addressed by contacting us first, you can contact the supervisory authority in the United Kingdom, the Information Commissioner's Office: <https://ico.org.uk/concerns/>