



## Data Protection Impact Assessment (DPIA) Youth Endowment Fund (YEF) Data Archive

### About this document

The Youth Endowment Fund (YEF) funds projects to help prevent children becoming involved in violence. To find out what works, we need to collect and store sensitive personal data so that we can follow-up on children's progress in the future. Researchers will use this data to better understand children's involvement with crime and what works to prevent it.

A Data Protection Impact Assessment (DPIA) is requirement of the Information Commissioner's Office (ICO) for all projects that involve the processing of personal data that carry potential risks to individuals. This DPIA sets out: why and how we will collect and store data on the children from the projects we fund; the justification for the types of data we will collect; and, the risks and mitigations in place for those risks.



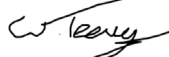
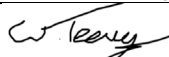
### Version History

|                                |   |
|--------------------------------|---|
| Version                        | 2.0   |
| Changes from previous version. | The DIPA has been updated to reflect changes to what happens to the services participants receive who do not opt to have their data collected. Several other minor amendments have been made. |

### Controller details

|                            |   |
|----------------------------|---|
| Name of controller         | The Youth Endowment Fund Charitable Trust<br>(charity registration no. 1185413) |
| Name of controller contact | William Teager, Head of Data and Insights                                       |

### Sign-off

|                                     |   |
|-------------------------------------|---|
| Measures approved by                | <br>Jon Yates, Chief Executive of YEF (18/06/21)         |
| Residual risks approved by          | <br>Jon Yates, Chief Executive of YEF (18/06/21)         |
| Consultation responses reviewed by  | <br>William Teager, Head of Data and Insights (18/06/21) |
| This DPIA will kept under review by | <br>William Teager, Head of Data and Insights (18/06/21) |

## Step 1: Need for a DPIA

### What the YEF project aims to achieve and the need for a DPIA

The Youth Endowment Fund (YEF) is an independent charity with a £200m endowment and a mission that matters. We're here to prevent children and young people becoming involved in violence. We do this by finding out what works and building a movement to put this knowledge into practice.

The YEF will run for a minimum of 10 years and its core purposes are to:

- support the delivery of promising programmes aimed at preventing high-risk children and young people from being involved in crime and violence
- commission independent organisations to evaluate the impact of each programme supported by the YEF
- create a central archive of data from the evaluations (the "YEF Archive") in order to evaluate the impact of the activity YEF funds against future outcomes, in particular, offending behaviour
- act as a centre of expertise for future research and analysis, promoting new knowledge and practice aimed at transforming local and national responses to tackling crime and serious violence

The YEF has identified the need for a DPIA as the long-term archiving of personal data by the YEF for use in future research and analysis will involve:

- processing personal data of vulnerable data subjects (children);
- processing special category personal data and criminal offence data;
- systematic monitoring and evaluation of children's personal data; and
- combining, comparing, and/or matching personal data from multiple sources.

## Step 2: Processing

### The nature of the processing

The core of the YEF's mission is to evaluate what works to reduce violent youth offending. We will do this by:

- conducting independent rigorous evaluation of the programmes we fund over the evaluation period, looking at a range of offending, behavioural, and intermediate outcomes; and,

- collecting, storing, and archiving personal data of the data subjects who take part in the programmes (“Participants”) so outcomes can be assessed in future years.

The flow diagram in the [annex](#) illustrates the ways in which Participants personal data will be processed by various parties during each stage of the YEF project.

The YEF Guidance for Projects and Evaluators (available on the YEF website [here](#)) provides more information about how and why Participant personal data will be processed.

### **Collection**

Personal data will be collected directly from Participants or from their parents/guardians/carers by the evaluator appointed to work with that programme or, in some cases, the programme that receives grant funding from the YEF or third parties that projects may be working with.

The YEF will enter into contracts with each programme and each evaluator. These contracts will include provisions requiring the programme and the evaluator to comply with relevant data protection legislation.

The programme and/or evaluator (as applicable in each case) will also be required to include information about how Participant personal data will be used by the YEF, and to provide a link to the YEF information and privacy notice (available on the YEF website [here](#)), in the privacy information they provide to Participants or their parents/guardians/carers pursuant to Article 13 or Article 14 of the GDPR. The YEF will review all privacy notices before they are provided to Participants (or their parents/legal guardians/carers) to ensure this has been done.

### **Use by programmes and evaluators**

The YEF acknowledges that programmes, the third parties they work with, and evaluators may use Participant personal data for a variety of purposes connected to their own activities (e.g. storing personal information for the purpose of contacting Participants). As the controllers of Participant personal data during the programme and evaluation stages of the project, they will be responsible for ensuring that all such processing is fair and lawful and is communicated to data subjects.

The YEF will only require programmes and evaluators to use Participant personal data for evaluation purposes (i.e. pilot studies and/or efficacy studies).

After each pilot study or efficacy study, the YEF will require the evaluator to share Participant personal data with the YEF for archiving purposes. The YEF will enter into a Data Sharing Agreement with each evaluator for this purpose.

Once an evaluation is complete, the evaluator will also be required to write a report which will be published on the YEF's website (the "Evaluation Reports"). Evaluation Reports will not contain any Participant personal data.

### **Use by the YEF**

The YEF will use Participant personal data from pilot studies and efficacy studies to add to the YEF Archive. The data held in the YEF Archive may then be used to conduct:

- long-term follow-up of project participants against records held on them in the education and criminal justice system, in order to evaluate the impact of YEF's activity against offending behaviour;
- pooled analysis of data from YEF-funded programmes to explore what works in different geographic areas and for particular subgroups (e.g. gender, ethnicity, children who have experienced periods of care etc.) that may be identified from the data collected from the programmes themselves or from linked administrative datasets;
- quality assurance, reanalysis, and methodological exploration across the outputs and results published in Evaluation Reports;
- other research or analysis for the public benefit and which meets ethical requirements (see '[YEF Archive - Research and Analysis](#)' below).

### **Pseudonymisation of data in the YEF Archive**

YEF will instruct evaluators to share all personal data directly with the Department for Education (DfE) in order for the data to be pseudonymised before it is transferred to the YEF Archive. The YEF will enter into a legally binding agreement with the DfE.

The DfE will match each Participant with their unique Pupil Matching Reference (PMR) number, which is held in the DfE's National Pupil Database (NPD). The DfE will then transfer the pseudonymised personal data, along with the PMRs, to the YEF archive.

### **YEF Archive - Storage and security**

The YEF Archive will be stored in the Office of National Statistics's (ONS) Secure Research Service (SRS). The ONS will act as a processor for the YEF when storing the YEF Archive in the SRS. The YEF will enter into a legally binding Data Processor Agreement with the ONS, which will comply with the requirements of Article 28 of the GDPR.

Separately, the DfE and the ONS will have in place an appropriate Service Level Agreement for the purposes of transferring the pseudonymised participant data linked to the PMRs into the SRS.

The SRS has in place strict physical security measures, digital security measures (including encryption), access restrictions, and disaster recovery plans. Furthermore, the ONS is:

- an accredited processor under the Research Strand of the Digital Economy Act<sup>1</sup>
- accredited with NHS Digital<sup>2</sup>
- registered with the ICO (registration no. Z1404686)<sup>3</sup>

### **Linking DfE and MoJ data and long-term follow-up**

Separately, the DfE will link personal data in the NPD with records held in the Police National Computer (PNC), which the Ministry of Justice (MoJ) is responsible for. The DfE and the MoJ are the controllers of this personal data (the “Linked Data”). The Linked Data will not be held in the YEF Archive and YEF will not be a controller of the Linked Data.

When approved researchers wish to access data held in the YEF archive in order to conduct research on long-term outcomes, they will request access to the relevant personal data held in the YEF archive along with their corresponding PMRs, and specific variables from the DfE-MoJ Linked Data. All datasets will be accessed via the SRS.

### **YEF Archive - Research and analysis**

YEF will only permit data in the YEF Archive to be used via the SRS, which is governed by the ONS’s ‘Five Safes’ framework:

1. **Safe people:** researchers must apply to access the information in the YEF Archive and must have relevant academic qualifications or work experience. If their application is successful, researchers will be trained by the ONS in how to use the data in the SRS and they must pass an assessment. Once a researcher is accredited, the ONS will continue to monitor how they use data in the SRS.
2. **Safe projects:** the ONS places restrictions on how the data in the YEF Archive can be used. First, the YEF must give its support to each research proposal and the researcher must be able to demonstrate that their research will serve the public good in one of the ways defined by the ONS. Secondly, all proposals must be

<sup>1</sup> <https://uksa.statisticsauthority.gov.uk/about-the-authority/better-useofdata-statistics-and-research/betterdataaccess-research/better-use-of-data/list-of-accredited-processors-under-the-research-strand-of-the-digital-economy-act/>

<sup>2</sup> <https://www.dsptoolkit.nhs.uk/OrganisationSearch?searchValue=office+for+national+Statistics>

<sup>3</sup> <https://ico.org.uk/ESDWebPages/Entry/Z1404686>

supported by a recognised ethics panel. Thirdly, all proposals will be assessed by the ONS's independent Research Accreditation Panel.

3. **Safe settings:** researchers cannot move data in or out of the SRS. The ONS uses a combination of secure technology, physical security measures, and extensive procedures and protocols to protect the data when it is being used. For example, researchers are unable to access the internet and only approved software can be used. The ONS also use protective monitoring software, including recording every keystroke made by the researcher.
4. **Safe data:** researchers can only use data that have been de-identified, so they will not be able identify data subjects. See '[Pseudonymisation of data in the YEF Archive](#)' above for further details.
5. **Safe output:** once a researcher has completed their project, two members of staff in the ONS's Research Services and Data Access team independently review the research to ensure that data subjects' privacy and confidentiality is safeguarded. All research must be published.

### **Retention**

Data in the YEF Archive will be retained indefinitely and for as long as necessary for the purpose of future research, analysis, and methodological exploration. The YEF will review the storage of data in the archive every 5 years following submission to assess whether there is a continued benefit to storing the data and its potential use in future research.

Article 5(1)(e) of the GDPR permits storage of personal data for longer periods for the purposes of historical research, archiving in the public interest, and statistical purposes. The ICO's guidance on storage limitation also indicates that personal data can be held indefinitely for research and archiving purposes<sup>4</sup> and this is also consistent with the National Archives Guide to Archiving Personal Data<sup>5</sup>.

In his preliminary opinion on data protection and scientific research, published on 6 January 2020, the European Data Protection Supervisor (EDPS) acknowledged that there are few guidelines on the application of data protection rules to scientific research. We have referred to the EDPS's preliminary opinion when developing our approach to data storage, but we note that further work is taking place within the European Data Protection Board (EDPB) and national authorities on questions of data retention for archiving and research purposes. The YEF will continue to monitor developments in this area and review our approach to data storage and retention to ensure it continues to reflect the law and best practice in this area.

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<sup>4</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/storage-limitation/#archiving>

<sup>5</sup> <https://www.nationalarchives.gov.uk/documents/information-management/guide-to-archiving-personal-data.pdf>

## The scope of the processing

The YEF expects to fund several hundred projects across England and Wales. The number of Participants in each project will vary from less than a hundred to potentially a few thousand. Participants in individual programmes typically receive support for one or two years.

The YEF will require evaluators to share the following Participant personal data with the DfE for the purposes of pseudonymisation:

- For projects delivered in schools – Participant name, gender, date of birth, and school's unique pupil reference numbers.
- For projects not delivered in schools and where unique pupil reference numbers are not available – Participant name, gender, date of birth, and home address.

The following types of personal data are also likely to be collected from Participants for the purposes of evaluation:

- special categories of personal data including information revealing Participants' racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sex life, sexual orientation;
- criminal allegations, proceedings, or convictions as well as any related security measures, including any criminal offence data that participants self-report; and,
- Information about the young person's behaviour, attitudes, friends and social life, family life and their community.

As set out above, this personal data will be transferred to the SRS where the archive will be held by the DfE, once the data has been pseudonymised. Data in the YEF Archive may be matched with other data sets (such as the NPD and PNC) in the future in order to conduct research and analysis.

## The context of the processing

### **Relationship with participants**

The YEF acknowledges that it will not have a direct relationship with the Participants or their parents/guardians/carers at the point when personal data is collected. The YEF will take the following steps to ensure that Participants understand how their personal data will be used by the YEF if they choose to take part in the evaluation:

- YEF will provide each programme and evaluator with a copy of the YEF information and privacy notice (available on the YEF website [here](#)), and will ask programmes and evaluators to include a link to this information in the privacy

notice they provide to Participants or their parents/guardians/carers (per Article 13 or Article 14 of the GDPR)

- YEF will ask each programme and evaluator to share with the YEF a copy of the privacy notice they intend to use for YEF-funded work before the work commences so that YEF can check that: (1) clear information about the YEF Archive has been provided; and (2) nothing in the privacy notice is inconsistent with the way in which personal data will be processed by the YEF for the purposes of archiving and future research/analysis.
- YEF will make clear to each programme and evaluator that Participants can choose not to be involved in the project and associated evaluation, in which case their personal data will not be collected or transferred to the YEF Archive. Where participants choose not to take part in the study, all the usual services available to them will continue. However, they will not be able to take part in the specific intervention that is being trialled (unless there are exceptional circumstances).

### **Security**

Personal data in the YEF archive will always be processed via appointed processors (e.g. the DfE and ONS or other third parties) who will process the data securely on YEF's behalf.

All data shared between evaluators and the DfE will use Egress to transfer data. Egress provides a range of encryption services for secure data transfer, offering on-demand security for organisations sharing confidential information electronically. The information is encrypted using AES 256-bit encryption.

The DfE has in place data sharing arrangements with the ONS to facilitate the transfer of the pseudonymised YEF personal data to the YEF Archive in the SRS.

The YEF is confident that personal data will be protected to a high level once it is in the SRS (see '[YEF Archive – Storage and security](#)' above). The SRS is currently used to store similar archives of data which include highly confidential and/or sensitive information, including the Labour Force Survey, Census 1961-2011, Birth and Mortality Data, Higher Education Student Statistics, UK Innovation Survey, National Travel Survey, and the NPD.

### **Use of personal data in the YEF Archive**

The YEF acknowledges that there may be issues of public concern about how personal data in the YEF Archive may be used in the future, in particular because the YEF is funded by the Home Office (e.g. potential concerns about Participant data being used for immigration enforcement purposes). However, the YEF is confident that the following



protections will ensure that personal data in the YEF Archive cannot be used for such purposes:

- pseudonymisation of all personal data before it is submitted to the YEF Archive, meaning that no one would be able to identify individual data subjects solely using data in the YEF Archive
- physical and ethical checks and approvals required in order for anyone to be able to access data in the YEF Archive (see '[YEF Archive - Research and analysis](#)' above)
- limits imposed by the data protection legislation when processing data for archiving and research purposes, including section 19 of the Data Protection Act 2018:

**19. Processing for archiving, research and statistical purposes: safeguards**

*(1) This section makes provision about—*

*(a) processing of personal data that is necessary for archiving purposes in the public interest,*

*(b) processing of personal data that is necessary for scientific or historical research purposes, and*

*(c) processing of personal data that is necessary for statistical purposes.*

*(2) Such processing does not satisfy the requirement in Article 89(1) of the GDPR for the processing to be subject to appropriate safeguards for the rights and freedoms of the data subject if it is likely to cause substantial damage or substantial distress to a data subject.*

*(3) Such processing does not satisfy that requirement if the processing is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.*

The YEF information and privacy notice (available on the YEF website [here](#)), makes reference to the above protections.

#### Purposes of the processing

The work of the YEF is funded by the Home Office in the exercise of its statutory powers to assist victims, witnesses, or other persons affected by offences. As set out above, the aims of the YEF are to:

- support the delivery of promising programmes aimed at preventing high-risk children and young people from being involved in crime and violence

- commission independent organisations to evaluate the impact of each programme supported by the YEF
- create a central archive of data from the evaluations (the “YEF Archive”)
- act as a centre of expertise for future research and analysis, promoting new knowledge and practice aimed at transforming local and national responses to tackling crime and serious violence

As described above, any researcher who applies to use data in the YEF Archive must demonstrate that their research will serve the public good in one of the ways defined by the ONS. Furthermore, all proposals must be supported by a recognised ethics panel and will be assessed by the ONS’s independent Research Accreditation Panel, and all research must be published (see [‘YEF Archive – Research and analysis’](#)).

### Step 3: Consultation

#### Consultation with relevant stakeholders

YEF has consulted extensively with the following stakeholders:

- evaluators
- the Education Endowment Foundation (EEF) – who carry out similar work using children’s personal data
- ONS
- DfE

YEF has also taken legal advice from data protection specialists in the Charity and Social Business team at Russell-Cooke solicitors.

### Step 4: Necessity and proportionality

#### Compliance and proportionality measures

##### **Lawful basis for processing personal data**

##### Lawful basis under Article 6 of the GDPR

The YEF will process personal data under Article 6(1)(e) of the GDPR: processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Per Article 6(3) of the GDPR and section 8 of the Data Protection Act 2018 (DPA) the YEF’s work performs a public task as it is funded by the Home Office in furtherance of their statutory powers to assist victims, witnesses or other persons affected by offences.

#### Lawful basis for processing special categories of personal data

Any special categories of personal data used by the YEF will be processed under Article 9(2)(j) of the GDPR: processing necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes and Section 10 of the DPA, which provides that processing meets the requirement in Article 9(2)(j) of the GDPR if it meets a condition in Part 1 of Schedule 1 to the DPA. Specifically Paragraph 4 of Part 1 of Schedule 1 provides that this condition can be used for processing which is:

- necessary for archiving purposes, scientific or historical research purposes or statistical purposes;
- carried out in accordance with Article 89(1) of the GDPR, as supplemented by section 19 of the DPA; and
- in the public interest.

#### Lawful basis for processing criminal offence data

Any criminal offence data used by the YEF will be processed under Article 10 of the GDPR and Sections 10 and 11 of the DPA. Specifically, Section 10(5) of the DPA which provides that processing of criminal offence data meets the requirements in Article 10 of the GDPR if it meets a condition in Part 1, 2 or 3 of Schedule 1 to the DPA. As set out above, the YEF will rely on the research condition in Paragraph 4 of Part 1 to Schedule 1 of the DPA.

#### **Safeguards - Article 89(1) of the GDPR and Section 19 of the DPA**

The safeguards that will be put in place to protect personal data in the YEF Archive are set out above (see '[Pseudonymisation of data in the YEF Archive](#)', '[YEF Archive - Storage and security](#)' and '[YEF Archive - Research and analysis](#)').

A core aim of the YEF project is to be able to evaluate the long-term impacts of YEF-funded programmes. It would not be possible to achieve this purpose without processing personal data (e.g. by using anonymised data instead) as this would prevent Participant data being matched with data held in other relevant data sets in the future, in particular, official offence records.

#### **Data quality and data minimisation**

Evaluators that work on YEF funded projects are selected through a rigorous process that ensures they have the technical skills to conduct the evaluation and experience of working with the vulnerable children. Firstly, evaluators apply to be on YEF's Evaluator Panel. This involves YEF undertaking a detailed assessment of the CVs of the prospective evaluation team, their skills and experience in carrying out evaluation and

an assessment of the relevance of previous research to YEF's remit, including their experience of evaluation with vulnerable children. Secondly, evaluators bid to carry out a specific evaluation. Bids are assessed against: the capability and relevant experience of core project team; the methodology and approach; and value for money.

All programmes funded by the YEF must have a credible theory of change or existing evidence that suggests they may lead to reductions in youth offending. In this way, the YEF ensures that the personal data collected is proportionate and justified for the purposes of future analysis and evaluation of the impact these programmes have on offending.

Evaluation decisions are made by the evaluator, in collaboration with the programme, and the overall approach must be signed off by the YEF. YEF confirms the evaluation design through two main mechanisms. First, the evaluation proposal is examined by YEF's Grants and Evaluation Committee who provides approval that the project and evaluation will receive YEF funding. Second, following that approval, evaluators are expected to complete a detailed Protocol and a Statistical Analysis Plan which can also be peer reviewed when necessary.

The YEF will work with evaluators to ensure that personal data transferred to the YEF Archive is:

- adequate (i.e. sufficient to enable quality research and analysis in the future);
- relevant (i.e. it has a rational link to the YEF's archiving, research, and analysis purposes described above); and
- limited to what is necessary for these purposes.

The sorts of data that we expect evaluators to collect and make available for archiving are set out in the YEF Guidance for Projects and Evaluators (available on the YEF website [here](#)).

### **Individual rights**

As set out above (see '[Relationship with Participants](#)'), YEF will work with programmes and evaluators to ensure that Participants' right to be informed is addressed by providing them with a copy of the YEF information and privacy notice (available on the YEF website [here](#)). The privacy notice gives Participants information about their individual rights under the GDPR and provides contact details for the YEF, should a data subject wish to exercise those rights in the future.

The YEF acknowledges that the GDPR and the DPA include exemptions from some individual rights in circumstances where personal data is used for archiving in the

public interest and research purposes. However, we will not routinely rely on exemptions and will consider each individual request on a case-by-case basis. If the YEF does decide to rely on an exemption, we will write to the data subject making the request explaining our justification and reasons.

**International transfers**

The YEF does not envisage any transfer of personal data outside the UK.

**Step 5: Risks**

| Source of risk and nature of potential impact   | Likelihood of harm (Remote, Possible or Probable) | Severity of harm (Minimal, Significant or Severe) | Overall risk (Low, Medium or High) |
|---|---|---|------------------------------------|
| (1) Invisible processing – risk that Participants and/or their parents/guardians/carers do not receive privacy information from the YEF required under Article 14 of the GDPR                                     | Possible  | Significant                                       | Medium                             |
| (2) Risk that vulnerable data subjects (children) are unable to knowingly and thoughtfully oppose or consent to the processing of their personal data   | Possible  | Significant                                       | Medium                             |
| (3) Risks of loss of confidentiality at any stage of the YEF project, potentially leading to reputational damage (e.g. disclosure of criminal offence or special category personal data)                          | Possible  | Severe  | High                               |
| (4) Risk of unauthorised reversal of pseudonymisation   | Remote  | Severe  | Medium                             |
| (5) Risk that personal data in the YEF archive could be used for purposes which are not in the public interest and/or which have a significant effect on the individual (e.g. debt collection or law enforcement) | Remote  | Severe  | Medium                             |

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|---|----------|---------|-----|
| (6) Risk of withdrawal of services or cooperation between ONS, DfE or MoJ | Possible | Minimal | Low |
|---|----------|---------|-----|

### Step 6: Approved Mitigations

| Risk | Options to reduce or eliminate risk   | Effect on risk (Eliminated, Reduced or Accepted) | Residual risk (Low, Medium or High) |
|------|---|--|-------------------------------------|
| (1)  | <p>YEF contracts with programmes and evaluators will require them to provide all Participants (and/or their parents/guardians /carers) with information about how personal data will be used by the YEF, and to include a link to the YEF information and privacy notice (available on the YEF website <a href="#">here</a>).</p> <p>YEF privacy information to be drafted in plain English and, as far as possible, using age-appropriate language.</p> <p>YEF privacy information to be easily available publicly via YEF website.</p>  | Reduced  | Low                                 |
| (2)  | <p>YEF will not use consent as its lawful basis to process Participant personal data, in part because it is acknowledged that children may be unable to give informed consent, and in part because processing for the purposes of archiving and future research places obligations on the YEF to safeguard and restrict the use of personal data in the future.</p> <p>YEF will only process personal data for archiving and research in the public interest. All Participants (and/or their parents/guardians/ carers) will be given privacy information about what personal data will be collected, why we need it and how it will be used, before they decide whether to take part in a YEF-funded</p> | Reduced  | Medium                              |

|     |  |         |     |
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|     | <p>programme and will be given the option to opt-out.</p> <p>The YEF will only use trusted evaluators.</p>   |         |     |
| (3) | <p>The YEF will enter into legally binding contracts with each programme and evaluator which will include confidentiality provisions and provisions requiring the other party to comply with all applicable data protection and privacy laws.</p> <p>The YEF will enter into legally binding contracts with the ONS and DfE to cover processing activities carried out by these bodies on behalf of the YEF. These contracts will comply with Article 28 of the GDPR, which includes confidentiality undertakings.</p> <p>All data shared between evaluators and the DfE will use Egress secure data transfer systems.</p> <p>All data will be pseudonymised before it is transferred to the YEF Archive.</p> <p>The DfE and ONS will have in place a Data Sharing Agreement to cover the transfer of personal data from the DfE to the YEF Archive in the ONS's SRS.</p> <p>Data in the SRS is protected by physical and digital security measures, and only authorised and approved researchers can access the data.</p> | Reduced | Low |
| (4) | <p>The YEF will use the DfE as processor to pseudonymise the Participant personal data and the DfE will hold the key to reverse the pseudonymisation process.</p> <p>As a public body, the DfE has in place appropriate confidentiality and data security agreements and processes with its staff who may have access to the YEF data.</p>   | Reduced | Low |

|     |  |         |     |
|-----|--|---------|-----|
|     | <p>The YEF will enter into a legally binding contract with the DfE which will cover the pseudonymisation process. The contract will include provisions aimed at preventing the unauthorised reversal of the pseudonymisation process.</p>  |         |     |
| (5) | <p>Physical security measures and ethical checks and approvals are required before anyone will be able to access data in the YEF Archive (see '<a href="#">YEF Archive - Research and analysis</a>' above). Processing for the purposes of making decisions which could significantly affect individual data subject would not be approved.</p> <p>Data protection legislation imposes restrictions on the YEF when processing data for archiving and research purposes, including the safeguards set out in section 19 of the DPA.</p> <p>All personal data in the YEF Archive will be pseudonymised, meaning that no one will be able to identify individual data subjects solely using data in the YEF Archive.</p> | Reduced | Low |
| (6) | <p>The YEF has received assurances from the DfE and ONS that there is no likelihood of them withdrawing their services and/or support to the YEF in the foreseeable future.</p>  | Reduced | Low |



## Annex – YEF Archive Data Flows

