

# Privacy Notice (How we use your information)

## Current Living in Kirklees Survey

Kirklees Council and Partners have commissioned a population survey of adults in Kirklees to gather and update quantitative data about health, wellbeing and inequalities. The Current Living in Kirklees (CLiK) is a population survey which runs every four years, with the last survey conducted in 2016 (details can be found at [www.kirklees.gov.uk/clik2016](http://www.kirklees.gov.uk/clik2016)). This will be the sixth adult survey of this kind to take place over the last 20 years. The organisations working together on CLiK 2021 include Kirklees Council, Kirklees Clinical Commissioning Group (CCG), NHS Trusts, the University of Huddersfield, Kirklees College, West Yorkshire Police, Primary and Secondary Heads, Third Sector Leaders, Mid Yorkshire Chamber of Commerce, and local organisations such as Locala.

The primary aim of the survey is to gather comprehensive data on physical, emotional, social and economic wellbeing, incorporating lifestyle factors and perceptions of the local area from people across Kirklees. The data collected from CLiK 2021 will help us understand local health and social care needs, housing and employment issues and the quality of life of Kirklees residents. These indicators are vital for the ongoing monitoring of health and wellbeing outcomes and inequalities as well as baselines for re-designed organisational and partnership programmes. The data from CLiK 2021 will also enable updates to key strategic documents such as the Joint Strategic Assessment (<http://observatory.kirklees.gov.uk/jsna>), the Joint Health and Wellbeing Strategy (<https://www.kirklees.gov.uk/beta/delivering-services/joint-health-and-wellbeing-strategy.aspx>) and Kirklees Health and Wellbeing Plan (<https://www.kirklees.gov.uk/beta/delivering-services/pdf/kirklees-health-and-wellbeing-plan.pdf>) and will also enable improved commissioning and service provision for Kirklees residents.

Previous iterations of this survey helped local organisations to identify and tackle inequalities and improve support and services delivered around housing, employability, wellbeing, mental health and tackling loneliness. The 2021 data will help us to understand people's needs and experiences now, how these have changed since the last survey in 2016 and will inform how we recover at a local level from the COVID-19 pandemic.

### **The categories of information that we collect, process, hold and share include:**

- Personal information - The online survey will include postcode. This is to identify where more than one person has completed the survey in a household. Personal data is removed from the survey by M.E.L Research and responses anonymised prior to sharing with Kirklees Council. Name and contact details will be collected solely for the purpose of administering the prize-draw, which is exclusively managed by an independent research company, M.E.L Research. This data will be kept separate to survey responses and will not be shared with any other organisations. Aside from name and contact details collected for the prize draw, the survey is anonymous.

- Characteristics - Demographic information, including age, sex, disability status, sexual orientation, religious beliefs and ethnicity will be collected alongside data on health and wellbeing, perceptions of the local area, household income and other health behaviours and conditions. Special category data such as those listed above are included in CLiK 2021 in order to understand the needs of the local population and, based on any identified needs, is used to support the provision of local services in Kirklees. All questions in the online survey are non-compulsory, and there are clear instructions throughout the survey notifying respondents that there is no obligation for any question to be answered.

We use this personal data in order to:

- Understand the needs of our local population and identify gaps in the provision of services;
- Improve the provision of existing services and commission new services based on local needs;
- Understand and tackle inequalities in our population;
- Derive statistics which inform decisions about future delivery of services;
- Compare the health and wellbeing of Kirklees residents against other local authorities and national data.

## **The lawful basis on which we use this information**

### **(e) We need it to perform a public task.**

Public Health mandated functions including Joint Strategic Needs Assessments and Pharmaceutical Needs Assessments require up-to-date and accurate local intelligence, which will be provided by the CLiK survey.

These legal bases are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities. This includes, but may not be limited to:

- Health and Social Care Act 2012
- NHS Act 2006

In order to do this work, we also need to collect some special category data. This is personal data that needs more protection because it is sensitive. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing special category information are:

### **(g) Reasons of substantial public interest (with a basis in law)**

Specifically, the NHS Act 2006, Section 2B, Section 111, and Paragraph 13 in Schedule 1

### **(j) Archiving, research and statistics (with a basis in law)**

## How we store your personal information

Your information is safely stored by M.E.L Research LTD. M.E.L Research are a certificated fair data company by the Market Research Society. All data generated by a project is registered on an internal asset register within M.E.L Research with scheduled timeframes for deletion. A monthly report flags when data needs to be securely removed from our systems, and this process is overseen by the M.E.L Research Data Protection Officer (DPO).

M.E.L Research will destroy the personal data relating to the prize 1 month after the completion of the prize-draw. All remaining CLiK 2021 data held by M.E.L Research will be deleted/destroyed at the end of the retention and destruction period agreed with Kirklees Council (3 months from the end of the project/contract).

### **M.E.L Research data storage and deletion:**

M.E.L Research use Microsoft 365 SharePoint as our data storage platform. All personal data is stored in dedicated project folders using Microsoft 365 SharePoint architecture and access control and user authentication is only granted to project staff requiring access to personal data.

SharePoint stores objects as abstracted code within application databases. When a file is uploaded to SharePoint, that file is disassembled and translated into application code and stored in multiple tables across multiple databases. In SharePoint, all uploaded content is broken into chunks, encrypted with AES 256-bit keys and distributed across the Data Centre. When a user permanently deletes, or purges content from SharePoint, all encryption keys for the deleted chunks are also deleted. The blocks on the disks that previously stored the deleted chunks are marked as unused and available for re-use.

Anonymised data is safely stored on Kirklees Council's secure network drives. At no point will Kirklees Council store or have access to personal information.

## Who we may share your information with

We may sometimes share the information we have collected about you where it is necessary, lawful and fair to do so. In each case we will only share the minimum amount of information, only when required, for the following reasons:

- To administer and allocate local funding;
- To understand inequalities in our local population;
- To gain insights and expertise with other local organisations;
- To update key strategic documents such as the Joint Strategic Assessment (<http://observatory.kirklees.gov.uk/jsna>), the Joint Health and Wellbeing Strategy (<https://www.kirklees.gov.uk/beta/delivering-services/joint-health-and-wellbeing-strategy.aspx>) and Kirklees Health and Wellbeing Plan (<https://www.kirklees.gov.uk/beta/delivering-services/pdf/kirklees-health-and-wellbeing-plan.pdf>);

- To enable improved commissioning and service provision for Kirklees residents;
- To identify and encourage good practice.

We may share this information with:

- Other services within Kirklees Council;
- Other partners involved with CLiK 2021, specifically Kirklees Clinical Commissioning Group (CCG), NHS Trusts, the University of Huddersfield, Kirklees College, the Police, Primary and Secondary Heads, Third Sector Leaders, Chamber of Commerce, and local organisations such as Locala.

Any data shared will be completely anonymised, and we do not share personal information about you with anyone else without consent unless the law and our policies allow us to do so.

## Your data protection rights

Under data protection law, you have a number of rights, including the right to have your records rectified and the right to ask for access to all the information the Council holds about you. These rights are listed in more detail on [Kirklees Council's data protection rights page](#).

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [Data.protection@kirklees.gov.uk](mailto:Data.protection@kirklees.gov.uk) if you wish to make a request.

## Further information

If you would like further information about how we manage your data, please see the [Kirklees Council privacy notice](#).

If you would like further information about this privacy notice, please contact:  
[phi@kirklees.gov.uk](mailto:phi@kirklees.gov.uk)

If you have any worries or questions about how your personal data is handled, please contact the Data Protection Officer at [DPO@kirklees.gov.uk](mailto:DPO@kirklees.gov.uk) or by ringing 01484 221000.

You can also complain to the ICO if you are unhappy with how we have used your data. You can contact the ICO via the ['Contact us' page on their website](#), or by ringing 0303 123 1113.