

## Privacy Notice (How we use your information)

### Current Living in Kirklees (CLiK) Survey 2025

CLiK is a population survey carried out approximately every four, commissioned by Kirklees Council, working alongside partner organisations. The main aim of the survey is to gather comprehensive data from Kirklees residents on physical, emotional, social and economic wellbeing, incorporating lifestyle factors and perceptions of the local area. Data obtained from CLiK will be used to understand the differences that partner organisations are making, learn more about inequalities, identify priorities, tailor and target services and interventions appropriately, and work more effectively with local communities to make a positive difference to the lives of people living in Kirklees.

Brightsparks Agency Ltd has been commissioned by Kirklees Council to carry out the CLiK 2025 survey as part of its research activities. For the purposes of this project, Kirklees Council is the data controller and Brightsparks Agency Ltd acts as the data processor. This means that Brightsparks collects, stores and processes survey responses strictly on behalf of Kirklees Council, in line with their instructions and in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

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

- Personal information
  - Postcode and/or locality (non-mandatory). Where a postcode is provided it will be removed from the dataset once the geographical lookups have been applied, and only an anonymised dataset will be shared with Kirklees Council.
  - Name and contact details – this information will only be required should you choose to enter the prize draw. This information will be stored separately to the survey responses and will not be shared with any third-party organisations.
- 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. (non-mandatory).

### Why we collect and hold this information

We use this personal data in order to:

- Understand the changing needs of our local population and identify gaps in the provision of services.

- Derive statistics which inform decisions about future commissioning and delivery of services.
- Understand and address inequalities in our population.
- Compare the health and wellbeing of Kirklees residents against other local authorities and national data.
- Enter you into the prize draw and contact you to notify you of a prize should you win.

## The lawful basis on which we use this information

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- 6(1)(a) Your consent. Where you have provided your contact details for the purposes of entering the prize draw, you can remove your consent by contacting Brightsparks Agency Ltd at 01484 622511 or email [support@cliksurvey2025.co.uk](mailto:support@cliksurvey2025.co.uk). Please note that if you remove your consent, you will be withdrawn from the prize draw.
- 6(1)(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

## Special category data

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 Article 9 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing special category information are:

- 9(2)(g) Reasons of substantial public interest (with a basis in law)
- 9(2)(j) Archiving purposes, in the public interest: scientific or historical research purposes

## How we store your personal information

Information captured through the survey will be securely stored on Brightsparks Agency's Google Workspace, Zoho Survey and SPSS platforms. These platforms are protected with role-based permissions, meaning access can be granted or removed as appropriate. Data is encrypted in transit and at rest, and access is monitored to ensure security and confidentiality.

As part of the analysis process, Brightsparks Agency Ltd may use artificial intelligence (AI) tools such as ChatGPT. Only anonymised data, which cannot identify individuals, will ever be uploaded to these tools. The use of AI is limited to supporting data cleaning, coding and analysis, and is always followed by manual checks to ensure accuracy. No personal or identifiable information will be processed by AI.

Brightsparks will retain the survey data electronically for 12 months. At the end of this period, identifiable data will be permanently deleted through a manual destruction process.

Survey responses returned on paper will be processed by Pearl Scan Solutions Ltd, a UK-based scanning provider. Pearl Scan is bound by a Data Processing Agreement with Brightsparks Agency Ltd. to handle data securely, and all paper copies are securely shredded once scanned.

A cleaned and anonymised final dataset will be transferred to Kirklees Council and securely stored on a restricted-access Council network drive, protected by password authentication. This anonymised information will be retained for a minimum of three years, in line with Public Health retention schedules, to enable continued analysis. It will then be securely destroyed.

We process personal data in accordance with the UK GDPR and the Data Protection Act 2018.

## 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 all information will be anonymised and we will only share the minimum amount of information, only when required, for the following reasons:

- To manage local authority performance;
- To administer and allocate funding;
- To inform commissioning decisions and service design;
- To identify and address inequalities;
- To monitor and respond to trends in health and health-related behaviours and outcomes

We may share this information with:

- Other services within Kirklees Council;
- National government department e.g. Department for Education;
- Other partners such as health, education, voluntary and community sector partners, and the police.

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: [businessadmin.ph@kirklees.gov.uk](mailto:businessadmin.ph@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.