

PURPOSE SPECIFIC INFORMATION SHARING AGREEMENT (PSISA)

The Agreement

TITLE: Pupil list data, demographic/background data (e.g. gender, year group, ethnicity and date of birth) and data on interventions (Mercers' Company schools evaluation)

Document History

This document has been distributed to:

Version	Date	Author	Released to	Comments/Changes made
V1	13/10/20	Professor Jessica Deighton, The Evidence Based Practice Unit, The Anna Freud National Centre for Children and Families & UCL	Helen Jones, Sandwell Academy	

Links to other Information Community Agreements or Purpose Specific Information Sharing Agreement (PSISA)s:

Agreement Title	Date & Version	Lead Agency	Contact details

1. Responsible Organisations under this Agreement

- a) The Data Controller: **Sandwell Academy** is a data controller under this agreement and will share pupil list, background and demographic data, and information about which students received which interventions for pupils in the relevant year groups who will complete the online Wellbeing Measurement Framework survey.
- b) The Data Processor: The Mercers' Company schools evaluation research team (a research team led by the Evidence Based Practice Unit, University College London and including University of Manchester), who will be referred to as the research team throughout the remainder of this agreement, is the data processor under this agreement and will receive information from **Sandwell Academy**.

Specifically, a list of pupils who will complete the online Wellbeing Measurement Framework (WMF) survey as part of the Mercers' Company schools evaluation project. Data related to pupil background and demographic data for pupils who are involved in the WMF survey. Lastly, information regarding children / young people who are in receipt of Mercers interventions for pupils who are involved in the WMF survey; specifically, a list of children who received each intervention, the period of contact and the number of contacts the young people received.

For the purposes of data sharing, the lead contact for the research team is University of Manchester B4.10 Ellen Wilkinson Building, University of Manchester, Oxford Road, M13 9PL.

2. Data Subjects affected by this Agreement

The Data Subjects are the young people who will complete the online Wellbeing Measurement Framework survey as part of the Mercers' Company schools evaluation project.

3. For what purpose is the information being shared?

Sandwell Academy is taking part in the Mercers' Company schools evaluation project because they are interested in monitoring and improving resilience and mental health among their pupils. Participating schools are receiving support in administering a secure, online survey (the Wellbeing Measurement Framework, WMF) and will receive an analysis of pupil responses from the research team.

Access to the online WMF requires pupils to enter a unique pupil password. In order to generate unique pupil passwords for the online WMF, the research team requires a complete list of pupils taking part in the research in the relevant year groups from your school. The use of unique pupil passwords ensures that pupils are not entering any identifiable information online (e.g. names) and allows the research team to identify pupil responses for the purpose of linking to background information about pupils (broad pupil characteristics such as gender, date of birth and ethnicity), demographic information (free school meal (FSM) eligibility, special education need (SEN) status) and information regarding which pupils will receive which interventions that will be provided by the schools.

Bespoke school feedback reports will review a number of areas, including pupils' positive wellbeing, behavioural and emotional difficulties, the presence and strength of protective factors (such as

perceived support at school, home and in the community). Where possible, they will benchmark your school's data against that of others to help gauge the strengths and challenges for your students and highlight areas to target for prevention or support. Background, demographic data will be matched with survey responses to conduct analysis of pupil responses.

In order to evaluate the benefits of the Mercers programme, it is crucial that we have information about which children received which intervention. Moreover, to ascertain whether effects vary based on differential exposure to intervention, information about how many sessions were attended and the duration of contact will be analysed along with pupil responses to the WMF survey. The data will be used to explore the effectiveness of the programme and the evaluation of the Mercers programme.

As well as being fed back to participating schools, the data gathered will be used to inform a wider research project (Mercers). The aim of the research is to understand young peoples' wellbeing so those working with them can improve the support that is provided. It is being led by the Evidence Based Practice Unit - UCL and the Anna Freud National Centre for Children and Families (Dr Jessica Deighton)- working in collaboration with the University of Manchester. This research has been approved by the UCL Research Ethics and Data Protection committees (UCL Ethics number: 15793/002).

4. What information will be shared with the research team?

a) Description of data/information:	b) Field:	c) Extracted from which system/ Derived from:	d) Agency Name:
Unique Pupil Number	13 or 14 character UPN	BROMCOM	Sandwell Academy
Background information	Forename Surname Date of Birth Gender Ethnicity	BROMCOM	Sandwell Academy
Demographic information	FSM eligibility SEN provision	BROMCOM	Sandwell Academy
Intervention information	Name of intervention Unique Pupil Number (or PMR or first name of the child/YP, last name of the child/YP, date of birth of the child/YP, gender of the child/YP) First contact date with the child/YP Last contact date with the child/YP Number of sessions the child/YP attended The reason of intervention ending	BROMCOM	Sandwell Academy
School year group	Year Group	BROMCOM	Sandwell Academy

School attended	Name of School	BROMCOM	Sandwell Academy
e) Frequency of data sharing		No more than 5 times in a year	
f) Other relevant information: Identifiable information will be held securely by the data manager at the University of Manchester and only anonymised data will be shared with Evidence Based Practice Unit, University College London for analysis.			

5. Limitations on use of the pupil list data

a) Two named Research team staff members Joao Santos (Named User) and Lawrence Wo (Named User) will receive identifiable data (UPN, pupil forename, surname, and date of birth), in conjunction with background and demographic information and information related to interventions from Sandwell Academy and will deidentify it (by removing UPN, forename, surname, and exact date of birth) for future use by other Research Team colleagues. Identifiable data will only be kept for data linkage between survey data, background and demographic data and intervention data as well as throughout the duration of the project. Under the terms of this agreement only the Named Users are permitted to access the identifiable data directly.
b) The Named Users and all Research Team members who access the data must use the data only as specified in this agreement whether in an identifiable format or not, and always in compliance with prevailing data protection legislation.
c) As agreed in the Research Team's ethics committee approval from University College London, individual pupil identities are shared with the Named Users for the purposes of generating unique pupil passwords and for linking data with background data, demographic data and data on interventions year on year and their responses to the survey will be anonymised.
d) Detailed, individual-level data accessed is to be treated as confidential information and treated as such in accordance with the General Data Protection Regulation (or prevailing data protection legislation), and the Research Team's data protection policy.
e) The Research Team is prohibited from sharing pupil list data or identified individual responses from individual pupils with any third parties.
f) The Research Team may not sell, rent or otherwise charge other parties for access to any data received from Sandwell Academy .
g) The Research Team may make a request for an additional Named User and will need to make the case for why an additional access is necessary. The Research Team will require the school to update permissions and approvals for Named Users annually.

6. Legislative Duties

Legislation	Duties
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General Data Protection Regulation 2018	<p>The General Data Protection Regulation (EU) 2016/679 applies from 25 May 2018 and a revised version of the Data Protection Act will become law, together Data Protection Legislation. This legislation will apply to any use of personal data and special category personal data, both of which will be used in this research.</p> <p>Under the GDPR, the legal basis for the sharing of pupil lists with the Research Team is public interest (article 6 (1) (e)), and the sharing of Special Category data relies upon (article 9 (2) (i)).</p> <p>It is also important to ensure that other GDPR rights are complied with. These are that data is processed lawfully, fairly and in a transparent manner in relation to individuals; collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; accurate and, where necessary, kept up to date; kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.</p>
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7. Conditions for processing

There is no legal requirement for the data to be collected, processed or shared.

Under the GDPR, the legal basis for the sharing of pupil lists with the Research Team is public interest (article 6 (1) (e)), and the sharing of Special Category data relies upon (article 9 (2) (i)).

8. Privacy Notices and Transparency

Pupils who will complete the online WMF and their parents thereof will all receive a privacy notice before any survey data are collected. There are two versions of the privacy notice, one specifically designed for young people and one for their parents/guardians. The privacy notices make parents and young people aware of what kind of data/information are being used in the research project, who is processing it, what it is being used for, and their rights in relation to the data. The privacy notices follow the advice from the Information Commissioner's Office (ICO) in terms of content, language, and style, and have been approved by UCL Data Protection.

9. Data Sharing Activity

(A) Role/ person sending/ data	(B) Organisation	(c) Method of Secure Transfer	(D) Frequency of Transfer
Joao Santos, data manager	University of Manchester	Data will be sent in an Excel spreadsheet within an encrypted (AES-256) 7-Zip archive via email. The password to decrypt	Once a year

Lawrence Wo, data manager		the Z-Zip archive will be provided separately, by telephone or SMS.	
Helen Jones	Sandwell Academy	Data will be sent in an Excel spreadsheet, password protected via email. The password will be provided separately via email or telephone call	No more than 5 times in a year

10. Retention of Data

(A) Organisation	(B) Location/Technical arrangements	(C) Duration	(D) Destruction
University of Manchester	University of Manchester's secure and password protected servers. Once the data is linked to the survey data, only anonymised data will be used to run appropriate analyses.	The identifiable data will be held until the end of the Mercers' Company schools evaluation (end of 2022). In line with the requirements of the UCL and AFNCCF retention schedules pertaining to research data, the anonymised data will be held indefinitely.	There will not be any hard copies of the data. The electronic identifiable data will be destroyed with appropriate electronic shredding software that meets HM Government standards.

11. Information Security Breaches

(A) Name and contact details of person who is to be informed of breach	
Agency	Name and contact details
Sandwell Academy	Helen Jones
Research Team	Principal Investigator - Professor Jessica Deighton, Anna Freud National Centre for Children and Families, Kantor Centre of Excellence, 4-8 Rodney Street, N1 9JH. Tel: 020 7794 2313. Email: Jessica.DeightonPhD@annafreud.org
(B) Timescales	If an information security breach (loss or unauthorised disclosure of identifiable data), is identified the School shall be notified within one working day of discovery, where feasible.
(C) Investigation	The Research Team will be advised by the Data Controller with regard to any data breach investigation.

12. Other measures or considerations

Data Rights

Both Parties will ensure the pupils' Data Rights with regard to use of their personal data are upheld and can be exercised as desired or applicable.

The Research Team will cease processing and delete any data relating to data subjects within a week if **Sandwell Academy** notifies them that consent has been withdrawn by a data subject. The Research Team have a process in place to enable them to do this. The process involves the Named Person to look-up the identifiable database to identify the random ID of the participant who has withdrawn their consent. Named Person will delete the participant's data from the main database and any earlier versions of this database. Named Person will alert the researchers in Anna Freud National Centre for Children and Families and UCL and provide them with the Random ID linked to the participant's data. The researchers will delete the data linked to this random ID from their dataset and any earlier versions of this dataset. If analysis has already taken place, it will not be possible to delete analysed data from findings. However, the participant's data in the dataset will still be deleted to avoid any further processing of the data. This process will take place in no more than one week after notification of the participant's choice to withdraw their consent to participate.

Other Data Protection Requirements

- a) The Research Team agrees to assist **Sandwell Academy** promptly with all valid subject access requests which may be received from the data subjects or their representative.
- b) The Research Team shall not use the personal data for any other purposes other than those formally agreed by **Sandwell Academy**.
- c) The Research Team shall not disclose the personal data to a third party in any circumstances other than at the specific written approval of **Sandwell Academy**.
- d) The Research Team is not permitted to sub-contract any of the processing, nor transfer the data to any third party, without explicit written agreement from **Sandwell Academy**.
- e) The Research Team will not transfer the personal data outside of the European Economic Area (EEA) without explicit written agreement from **Sandwell Academy** and appropriate security arrangements.
- f) Each Partner Organisation shall ensure that all employees used by it to provide the services as defined in the Agreement have undergone training in information governance and data protection, their duty of confidentiality under this agreement contract, and in the care and handling of personal data.

13. Warranty and indemnity

- a) Nothing in these terms will exclude or limit liability for death or personal injury caused by negligence, or fraudulent misrepresentation.
- b) Subject to 13(a) above, the Parties will have no liability for any indirect, special or consequential loss or damage howsoever caused. Each party should indemnify to the other, and keep the other indemnified, against all and any loss, damages, costs or claims sustained by the other Party arising out of any breach of the indemnifying parties' obligations arising under this Agreement.
- c) This Agreement is made in England and the construction, validity and performance of this Agreement shall be governed in all respects by English law and the courts of England.

14. Review of this agreement	
Name/Role of Reviewers:	Chris Mills Deputy Head
Date of Initial Review:	CAM
Date of Consequent Reviews:	September 2021 (yearly)

Annex 1

Purpose Specific Information Sharing Agreement (PSISA)

In respect of Pupil list data, demographic/background data (e.g. gender, year group, ethnicity and date of birth) and data on interventions

DECLARATION OF ACCEPTANCE & PARTICIPATION

Signed by, for and on behalf of: Page 1 of

Organisation	Sandwell Academy
Name	
Position	
Contact Details:	
Phone:	
Email:	
Signature:	
Date:	

Organisation	University of Manchester
Name	Joao Santos
Position	Data Manager
Contact Details:	B4.10 Ellen Wilkinson Building University of Manchester, Oxford Road, M13 9PL,
Phone:	0161 275 8512
Email:	joao.santos@manchester.ac.uk
Signature:	
Date:	

Organisation	University of Manchester
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Name	Lawrence Wo
Position	Data Manager
Contact Details:	B4.10 Ellen Wilkinson Building University of Manchester, Oxford Road, M13 9PL,
Phone:	0161 275 3415
Email:	lawrence.wo@manchester.ac.uk
Signature:	
Date:	

Each agency who signs up to this agreement is to complete this form. Please print off as required.