











# **Data Privacy statement for the Animal Research Nexus project**

#### Introduction

This Statement explains how the Animal Research Nexus Team makes use of any personal information collected about you in connection with our research.

The Animal Research Nexus is a team of collaborating researchers based at five UK universities: Exeter, Southampton, Manchester, Nottingham and Oxford. Our research is funded by the Wellcome Trust.

During the course of our research we will be storing and using personal data including contact details (such as email addresses) of research participants, collaborators, and research contacts. We will also be collecting notes written by ourselves as researchers, and transcripts of interviews with research participants, which may contain some personal information.

In accordance with GDPR, each participating University is a "data controller" in respect of the personal information collected by the different Animal Research Nexus project teams. All our programmes of research have received the appropriate institutional clearance for research involving human participants at the University at which they are based.

### 1. What data processing do we do?

We are collecting information from people to manage the research we are doing. This includes:

- Contacting people by email to see if they would like to take part in the research
- Asking people who would like to take part to record their consent to being interviewed
- Keeping a record of people's contributions to the project through recordings and notes



- Getting interview voice recordings transcribed
- Checking interview transcripts with people before including them in our analysis
- Anonymising interview transcripts
- Archiving interview transcripts (optional)
- Asking if people would like to be added to a mailing list for outcomes (optional)
- Sharing personal information about prospective research contacts amongst the Animal Research Nexus team

#### 2. What information do we collect from elsewhere?

In addition to asking people directly for their personal information as a part of our explicit consent procedures, we do sometimes collect information about individuals' work and personal details, like email addresses, from websites, business cards, conference programmes, or after meeting in person. We may keep these details on a database for later reference and share this information amongst the Animal Research Nexus team. We do this in order make sure that we don't all try and independently contact the same person or people.

# 3. Who might use my information?

We are working together and may share personal details amongst the 15 core members of the Animal Research Nexus team in order to manage our approaches to you as members of a busy community of stakeholders. We will always try to be explicit with you if we plan on sharing your contact details amongst the Animal Research Nexus team.

We will never share your personal details or information that would enable you to be identified outside of the Animal Research Nexus team. We would never transfer your personal data to any countries outside the UK or EEA.

If you have agreed to take part in our research via an interview, we will ask you if you are happy for us to share your interview transcript with the rest of the Animal Research Nexus team. This sharing will only take place with your permission as a part of our consent procedures.

Turning sound recordings into transcripts is considered data processing. We will always use a company who has signed confidentiality agreement with us and who has instituted the required GPDR practices to produce interview transcripts for us.

Unless we have secured your explicit consent to do so, we will never reveal personal information about you, including your name and place of work, in our blog posts, reports, presentations, or publications. We will also remove all information that is in any other way likely to make you personally identifiable (for example, the names of workplaces or colleagues), unless otherwise agreed.

#### 4. How is my information protected?

In collaboration with each other, and in line with our respective University guidelines, we have implemented appropriate security measures to protect the confidentiality, integrity



and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy law.

# 5. What are our legal grounds for processing data?

GDPR was not designed to impede research and allows research certain privileges. GDPR legislation recognises that data processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with safeguards

As researchers, we use the 'Task in the Public Interest' as the legal grounds for collecting and using your personal information. Universities are classed as public authorities for the purposes of data protection law. Current guidance issued by the UK Information Commissioner's Office (ICO) indicates that the 'public task' ground for processing applies to much of the processing of personal data carried out by Universities.

In order to ensure that safeguards are in place, we also use conventional social science and historical research consent practices to ensure that you are adequately protected and informed before you agree to an interview.

For more information on the application of GDPR to research please see this <u>list</u> of frequently asked questions.

### 6. How long will you retain my data for?

How long we retain your personal information depends on the purpose for which it was obtained and its nature. All participating institutions have implemented appropriate measures to ensure your personal information is securely destroyed when no longer required for the purposes of this study, unless you have agreed to be on our mailing list to hear regular project updates or to be contacted about participation in future research.

Sound files and interview transcripts, which are considered personal data until they are fully anonymised, will usually be stored for a maximum of five years after the termination of this study, unless specific arrangements have been made to the contrary. This is necessary for us to accurately record your contributions to our research, and holding primary data in this way is considered good research practice.

In cases where interviewees have given us explicit permission, we plan to deposit fully anonymised and decontextualized interview transcripts into the UK Data Archive, in accordance with the Concordat on Open Research Data. These will be embargoed for 10 years from the date they are deposited at the end of our period of research in 2022.

### 9. Your Information Rights

As in other contexts in which your data are kept on file, you have the following rights under applicable data privacy law in respect of any personal information we collect and use about you:

• The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.



- The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information or give statement that you dispute its accuracy.
- The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
- The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
- The right to object to the use of your personal information for direct marketing purposes.
- The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed.
- The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
- The right to object to decisions involving the use of your personal information, which have been taken solely by automated means.
- The Animal Research Nexus team is cannot remove fully anonymised data that has already been published in reports or articles.
- The right to complain to the relevant data protection regulator about our processing of your personal information.

# 10. Questions and complaints

If you have a question about how we are handing your data or wish to make a complaint about the way we use your personal information you should raise this with us by contacting us through one of the following options:

(a) Initially, by emailing <a href="mailto:AnimalResearchNexus@exeter.ac.uk">AnimalResearchNexus@exeter.ac.uk</a>
We will then ensure that your question or complaint is directed to the appropriate Principal Investigator and/or Administrator at the relevant participating institution.

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant data protection regulator.

### b) England and Wales

The Information Commissioner's Office, Wycliffe House Water Lane Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

# **Scotland**

Scottish Information Commissioner, Kinburn Castle, Doubledykes Roa, St Andrews, Fife, KY16 9DS

Tel: 01334 464610 or e-mail: enquiries@itspublicknowledge.info

