

# Guidance on drafting a research Privacy Notice for Research Participants

On the remaining pages of this document is the template of the Privacy Notice that **must** be provided to participants **before** you begin processing their personal data.

This template **must** be adapted to reflect the specific research being undertaken: **Bolded** instructions indicate where the Privacy Notice **must** be adapted. These **Bolded** instructions can be removed after you have adapted and included the necessary information. The ***Bold Underlined Italic*** instructions indicate details that must be included in the Participant Information Sheet (“PIS”). The ***Bold Underlined Italic*** guidance text can be removed from the Privacy Notice document only after you have completed the associated adaption in the PIS.

Further guidance is available in the [Research Governance Standard](#).

## FAQ

### (1) What is an ‘identifiable natural person’?

An ‘identifiable natural person’ is one who can be identified, directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### (2) How do I know if I will be using participants personal data for the purpose of automated decision making or for profiling purposes?

Please click on the two links below and read the information carefully in order to assist you in your analysis of this point. Should you have any concerns or questions about this after reading this material, please contact [dataprotection@uwe.ac.uk](mailto:dataprotection@uwe.ac.uk) for further assistance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/automated-decision-making-and-profiling/>

### (3) How do I know if my research project includes the processing of ‘special category’ personal data?

Please click on the link below and read the information carefully in your analysis of this point:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/special-category-data/what-is-special-category-data/>

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# Privacy Notice for Research Participants – [Insert Research Project Title]

## Purpose of the Privacy Notice

This privacy notice explains how the University of the West of England, Bristol (UWE Bristol) collects, manages and uses your personal data before, during and after you participate in **[insert details of research project]**. ‘Personal data’ means any information relating to an identified or identifiable natural person (the data subject).

This privacy notice adheres to the General Data Protection Regulation (GDPR) principle of transparency. This means it gives information about:

- How and why your data will be used for the research;
- What your rights are under GDPR; and
- How to contact UWE Bristol and the project lead in relation to questions, concerns or exercising your rights regarding the use of your personal data.

This Privacy Notice should be read in conjunction with the Participant Information Sheet and Ethical Consent Form provided to you before you agree to take part in the research.

## Why are we processing your personal data?

UWE Bristol undertakes research under its public function to provide research for the benefit of society. As a data controller we are committed to protecting the privacy and security of your personal data in accordance with the (EU) 2016/679 the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (or any successor legislation) and any other legislation directly relating to privacy laws that apply (together “the Data Protection Legislation”). General information on Data Protection law is available from the Information Commissioner’s Office (<https://ico.org.uk/>).

## How do we use your personal data?

We will only process your personal data when the law allows us to. In addition, we will always comply with UWE Bristol’s policies and procedures in processing your personal data. Our lawful basis for using your personal data for research purposes is fulfilling tasks in the public interest, and for archiving purposes in the public interest, for scientific or historical research purposes. **[If applicable insert above the details of the alternative lawful bases you are relying upon to process personal data. If you need to consider this, please contact the Data Protection Office: [dataprotection@uwe.ac.uk](mailto:dataprotection@uwe.ac.uk)].**

**[If applicable also insert the following text if your research project includes the processing of ‘special category’ personal data; “Our lawful basis for using your special category personal data for research purposes is Article 9 (j) Archiving, research and statistics (with a basis in law) by virtue of paragraph 4 of Schedule 1 of the DPA 2018”]**

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You can find out more information about lawful bases at the following webpage:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/public-task/>

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/legitimate-interests/>

We will always tell you about the information we wish to collect from you and how we will use it. We will not use your personal data for automated decision making about you or for profiling purposes. **[OR if applicable insert details of automated decision making and/or profiling. If you need to consider this please contact the Data Protection Office: [dataprotection@uwe.ac.uk](mailto:dataprotection@uwe.ac.uk)].**

Our research is governed by robust policies and procedures and, where human participants are involved, is subject to ethical approval from either UWE Bristol's Faculty or University Research Ethics Committees. This research has been approved by **[insert details of which ethics committee has approved the project, the ethics application reference number and the email contact details of the research ethics committee for queries, comments or complaints].**

The research team adhere to the the principles of the General Data Protection Regulation (GDPR).

For more information about UWE Bristol's research ethics approval process please see our Research Ethics webpages at [www1.uwe.ac.uk/research/researchethics](http://www1.uwe.ac.uk/research/researchethics)

## What data do we collect?

The data we collect will vary from project to project. Researchers will only collect data that is essential for their project. The specific categories of personal data processed are described in the Participant Information Sheet provided to you with this Privacy Notice. ***[insert categories of personal data in the Participant Information Sheet including where applicable details of where the data has not been obtained directly from the research participant]***

## Who do we share your data with?

We will only share your personal data in accordance with the attached Participant Information Sheet. ***[insert details of third parties who the data will be shared with and/or processed by in Participant Information Sheet, including if applicable details of personal data transfers outside the European Economic Area and what legal mechanism is in place for the transfer. If you need to consider this please contact the Data Protection Office: [dataprotection@uwe.ac.uk](mailto:dataprotection@uwe.ac.uk)].***

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### How do we keep your data secure?

We take a robust approach to protecting your information with secure electronic and physical storage areas for research data with controlled access. Access to your personal data is strictly controlled on a need to know basis and data is stored and transmitted securely using methods such as encryption and access controls for physical records where appropriate.

Alongside these technical measures there are comprehensive and effective policies and processes in place to ensure that those who process your personal information (such as researchers, relevant University administrators and/or third-party processors) are aware of their obligations and responsibilities for the data they have access to.

By default, people are only granted access to the information they require to perform their duties. Mandatory data protection and information security training is provided to staff and expert advice available if needed.

### How long do we keep your data for?

Your personal data will only be retained for as long as is necessary to fulfil the cited purpose of the research. The length of time we keep your personal data will depend on several factors including the significance of the data, funder requirements, and the nature of the study. Specific details are provided in the attached Participant Information Sheet **[Insert details of data retention in Participant Information]**.

Anonymised data that falls outside the scope of data protection legislation as it contains no identifying or identifiable information may be stored in UWE Bristol's research data archive or another carefully selected appropriate data archive.

### Your Rights and how to exercise them

Under the Data Protection legislation, you have the following **qualified** rights:

- (1) The right to access your personal data held by or on behalf of the University;
- (2) The right to rectification if the information is inaccurate or incomplete;
- (3) The right to restrict processing and/or erasure of your personal data;
- (4) The right to data portability;
- (5) The right to object to processing;
- (6) The right to object to automated decision making and profiling;
- (7) The right to [complain](#) to the Information Commissioner's Office (ICO).

We will always respond to concerns or queries you may have. If you wish to exercise your rights or have any other general data protection queries, please contact UWE Bristol's Data Protection Officer ([dataprotection@uwe.ac.uk](mailto:dataprotection@uwe.ac.uk)).

If you have any complaints or queries relating to the research in which you are taking part please contact either the research project lead, whose details are in the attached Participant Information Sheet or UWE Bristol's research governance manager ([researchgovernance@uwe.ac.uk](mailto:researchgovernance@uwe.ac.uk)).

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v.2: This template Privacy Notice was last amended in November 2020 and will be subject to regular review/update.