

Department of Children and Youth Affairs (DCYA) and the Central Statistics Office (CSO)

Privacy Statement for
***Growing Up in Ireland* Survey Participants**

Purpose

Under Data Protection legislation, individuals have a number of rights in relation to the personal data an organisation holds about them. The purpose of this notice is to inform you, as a ***Growing Up in Ireland*** survey participant, about the data processed by the ***Growing Up in Ireland*** project, how these data are handled and what your rights are.

Who we are and how to contact us?

The ***Growing Up in Ireland (GUI)*** project is funded by the **Department of Children and Youth Affairs (DCYA)** and managed by DCYA in cooperation with the **Central Statistics Office (CSO)**. GUI is carried out under an arrangement based on section 11 of the Statistics Act 1993, which permits the CSO to make arrangements with other public bodies for the collection, compilation, extraction or dissemination of information for **statistical** purposes.

DCYA and the CSO are joint data controllers responsible for personal data collected by GUI.

DCYA is a Government Department which leads the effort to improve the outcomes for children and young people in Ireland. The CSO is Ireland's national statistical office. The work of the CSO is carried out under the [Statistics Act 1993](#) which provides for the collection, compilation and dissemination for statistical purposes of information relating to economic, social and general activities and conditions in the State.

GUI survey data is collected under section 24 of the Statistics Act 1993.

DCYA and the CSO Data Protection Officers (DPOs) are responsible for overseeing questions in relation to this Privacy Statement (contact details below). If you have any questions about this statement, including any request to exercise your legal rights, please contact or send them to the DCYA DPO:

Data Protection Officer,
Department of Children and Youth Affairs,
Block 1,
Miesian Plaza,
50-58 Baggot Street Lower,
Dublin 2
D02 XWI4, Freepost F5055

Tel: 01-6473000
Email: sar@dcya.gov.ie

The contact details for the CSO DPO are:

Ms Maria Hurley,
Data Protection Officer,
Central Statistics Office,
Skehard Road,
Cork
T12 X00E
Tel: 021-4535000
Email: dpo@csa.ie

The **Economic and Social Research Institute (ESRI)** is also involved in GUI. The ESRI is commissioned by DCYA to carry out the GUI survey on the Department's behalf. The ESRI is a research institute with income from research funded by a number of government departments and agencies, commissioned research projects, competitive research grants and a government grant-in-aid.

The ESRI collects GUI data on behalf of DCYA and is the *Data Processor* under the GUI contract with DCYA.

What is *Growing Up in Ireland*?

Growing Up in Ireland (GUI) is the national longitudinal study of children in Ireland, funded by the DCYA. The study is managed and overseen by DCYA in cooperation with the CSO. It is carried out by a consortium of researchers led by the Economic and Social Research Institute (ESRI).

All GUI data is collected under section 24 of the Statistics Act, 1993. The Statistics Act protects the confidentiality of the data you provide to the GUI survey and ensures that it can only be used for statistical purposes.

GUI collects data to help inform public policies and services relevant to children, young people and families in areas such as education, childcare, physical and mental health, employment, training and social inclusion. All procedures and protocols adopted in the GUI survey, as well as all questionnaires and tests used, undergo rigorous ethical scrutiny by an independent Research Ethics Committee.

GUI involves collecting data through surveys of children, young people and their parents or guardians. Data about the children are also collected from their school teachers when they are at primary school. Data about the schools which GUI survey participants attend is collected from school Principals. GUI is a longitudinal survey, so the same individuals are contacted on several occasions over time so as to help us understand how the lives of the children and young people are developing and progressing.

There are two groups or cohorts surveyed by the GUI project: **Cohort '98** most of whom were born in 1998 (and their parents/guardians); and **Cohort '08** most of whom were born in 2008 (and their parents/guardians).

Data collection for Cohort '98 started when the children were 9 years old in 2007/2008 and took place again when they were aged 13, 17 and 20 years old. Data collection for Cohort '08 started when the children were infants at 9 months old in 2008/2009 and took place again when they were aged 3, 5, 7/8, and 9 years old. Cohort '08 will be surveyed again in 2021 when the children are 13 years old.

Definitions

- *Personal Data*
Personal data means any information relating **to a living individual** who can be identified, directly or indirectly. It can include a name, an identification number, location data, an online identifier or one or more factors specific to an individual's physical, physiological, genetic, mental, economic, cultural or social identity.
- *Special Categories of Personal Data*
Special categories of personal data mean data revealing racial or ethnic origin; political opinions or religious or philosophical beliefs; trade union membership; genetic data; biometric data; data concerning health; individual's sex life or sexual orientation.
- *Data Processing*
Processing means doing anything with the data, such as storing, accessing, disclosing, destroying or using the data in any way.

What is the purpose and lawful basis for processing personal data from *Growing Up in Ireland* survey participants?

Article 6 of the EU General Data Protection Regulation (GDPR) sets out the lawful bases under which personal data can be processed. There can be more than one lawful basis for personal data processing. The lawful bases for processing data from GUI come from Article 6 (c) and (e) and are explained below.

- Under Article 6 (c) processing is necessary for compliance with a legal obligation to which the controller is subject. As a joint data controller for GUI, the **CSO** processes your personal data in the exercise of official authority vested in it under statute and in compliance with a legal obligation on the CSO imposed by the Statistics Act 1993.
- Under Article 6 (e) data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. As a joint data controller for GUI, **DCYA contracts the ESRI to** process your personal data for the performance of a task in the public interest and the exercise of the official authority vested in the Minister and the Department of Children and Youth Affairs.

Additionally Article 9(2) (j) provides for the processing of special categories of personal data for statistical purposes. This includes data collected in all rounds of the survey on ethnicity, religion, health (including mental health); and data collected in some rounds of the survey on political views, trade union membership, sexual orientation and behaviour. These are further described below under 'Survey Data'.

The **ESRI** is a data processor for GUI and processes your personal data and special categories of personal data for **statistical purposes** in accordance with data protection legislation. In this regard, the results of the GUI study are made public but without identifying individuals, so that they can inform research and policy. GUI survey data can only be used for statistical purposes and personally identifiable data from the survey is not shared by DCYA, the CSO or the ESRI with any third parties outside of the GUI project.

In order to make the best possible use of the information provided by survey participants, the Central Statistics Office – operating under the strictest controlled procedures – may link the information from this survey to other types of information held about survey participants or the areas they live in. This would only be done for statistical research purposes under the Statistics Act 1993 and the results of the analysis would not include any personal information about participants. For further information on CSO data linkage see <https://www.cso.ie/en/aboutus/lgdp/csodatapolicies/csodataprotocol/csodataprotocolregister/>

What personal data do we process on *Growing Up in Ireland* survey participants?

Contact Details: Since the same individuals and families are contacted over time, the GUI Study Team at the ESRI need to keep contact details for GUI participants, parents and children or young people, in order to conduct the surveys on behalf of DCYA. The contact details include: name, address, telephone number, email address, mobile telephone number and the contact details of someone, such as a grandparent, who may be able to help us keep in touch with the family if they move house. GUI also holds data on household GPS and eircode.

CAO number: This information is provided by some survey respondents who agree to give it during the GUI survey. It is used solely for the purpose of matching some of the information provided in their survey interview to the details in their CAO application form for access to further or higher education courses.

PPSN: The PPS number is held for individuals from Cohort '08 who gave it during the course of the survey for tracing purposes and for the purposes of matching GUI data to other data (e.g. childcare providers).

Survey Data: Information on the child and their parents is collected in the following areas:

- Family Type and Structure, including information on childcare arrangements and providers.
- Socio-Demographic Characteristics, including level of education, income, work experience, nationality, ethnicity, migrant status, marital status.
- Physical Health, including maturation and physical health status and development, measured height, weight, blood pressure, diet, exercise, risky health behaviours, use of health services, sedentary activities.
- Socio-Emotional Well-being, including mental health of the child and parents, psychological, emotional and mental health status, socio-emotional and behavioural development, self-concept, social behaviour.

- Education and Cognitive Development, including participation in education, educational aspirations, cognitive development and assessment, how the child or young person is getting on in school, with school subjects, teachers and peers, as well as information on the pupil and the school gathered from teachers and the school principal.
- Relationships between parents, information about the child from parents, parenting arrangements between parents, relationships between parents and children, between children/young people and their peers. Parents refers to any parents who participate in the survey whether they live in the household or elsewhere.
- Responsibility and Social Participation, including an activity diary, involvement in clubs and volunteering, anti-social behaviour, household chores, preparation for life after school.

Information is also collected from childcare providers, including information about the GUI study child in relation to how long the child has attended the centre, how many hours and days per week they attend and how easy the child is to get on with.

GUI data are mostly collected through survey questionnaires administered by an interviewer using a laptop in the home. Data may also be collected using computer assisted telephone interviews or by the CSO's online survey systems. However, additional data were collected through personal interviews with 122 parents of Cohort '08 at nine months old and with 122 Cohort '98 parents and 122 children at nine years old. These interviews explored the same issues as the GUI survey questionnaire but in more depth.

Full details of the data collected in each wave of GUI can be found in the questionnaires:

<https://www.growingup.ie/questionnaires/>.

The relevance of the information collected is published in the Design and Instrumentation Reports for the relevant waves of data on the **Growing Up in Ireland** website:

<https://www.growingup.ie/growing-up-in-ireland-publications/>.

The survey data are stored at the ESRI separately from all identifying information. The survey data are processed internally within the ESRI on behalf of DCYA in a pseudonymised form (with all identifying information removed).

These data are processed for statistical purposes under the Statistics Act 1993. Great care is taken to ensure the confidentiality of the data provided. No data are released or published which could identify a particular individual or family.

Under Section 32 of the Statistics Act 1993 all information recorded '*...shall be used only for statistical compilation and analysis purposes*'. Equally, the information recorded in the course of the **Growing Up in Ireland** Study may not be released in a manner which '*...can be related to an identifiable person or undertaking*' '*...except with the written consent of that person or undertaking ...*' (Section 33, Statistics Act 1993).

Use of the data collected in the course of the **Growing Up in Ireland** study for any other purpose or release of data in a manner which would allow them to be associated with an identifiable person is an offence under the Statistics Act 1993, and would contravene data protection principles.

Do we share personal data with any third parties?

Personal data collected in the survey is not shared by DCYA, the CSO or the ESRI with any third parties outside of the GUI project.

Two types of ***Growing Up in Ireland*** datasets which do not contain any directly identifying personal information are made available for legitimate research purposes. The preparation of these datasets is done under the auspices of the CSO and in strict compliance with the Statistics Act 1993 to ensure that the confidentiality of GUI participants is protected.

- ***Growing Up in Ireland*** datasets known as Anonymised Microdata Files (AMFs) are made available to researchers through the Irish Social Sciences Data Archive. See <http://www.ucd.ie/issda/data/growingupinirelandgui/>.
- ***Growing Up in Ireland*** datasets known as Researcher Microdata Files (RMFs) which contain more detail than the AMFs, are made available through the CSO under strict and controlled conditions at the discretion of the Director General of the CSO, see <https://www.cso.ie/en/aboutus/lgdp/csodatapolicies/dataforresearchers/rmfapplicationprocedure/>

Currently these datasets are available for data collected from Cohort '08 at 9 months, 3 years, 5 years, and 7/8 years; and from Cohort '98 at 9 years, 13 years and 17/18 years.

Data from Personal Interviews

Datasets based on the additional GUI data collected through qualitative or personal interviews with parents and children in the first waves of Cohort '98 and Cohort '08 (at the ages 9 years and 9 months respectively) are also made available for research purposes. These datasets do not contain any identifying information and have been archived at the University of Maynooth, see <https://www.maynoothuniversity.ie/igda>

How long will GUI data be stored for?

Growing up in Ireland is a longitudinal project, which involves returning to participants at intervals over several years collecting information about the growth and development of children and young people over time. Given that GUI is longitudinal, it is necessary to retain personal data and sensitive personal data for at least the duration of the relevant participant's involvement with the GUI project.

Where identifying data are no longer required for the purposes of the survey or where no further data will be collected in relation to a particular participant (e.g. because they have discontinued their participation in the survey or have died), their contact details are deleted to anonymise the data and the anonymised data are retained indefinitely.

What rights do you as the data subject have?

The General Data Protection Regulation (GDPR) confers the following rights on individuals:

i. The right to be informed

ii. The right of access

iii. The right to rectification

iv. The right to erasure

v. The right to restrict processing

vi. The right to object to processing of personal data

Article 89(2) of the General Data Protection Regulation (GDPR) allows derogations from data subject rights where personal data are processed for scientific/historical research or statistical purposes. These apply in respect of your right of access, right to rectification, right to restriction of processing and right to object, but only where the exercise of these rights is likely to render impossible or seriously impair the achievement of the specific statistical purposes.

How can I submit a Subject Access Request?

If you wish to make a Subject Access Request, the most effective way to do so is in writing to the Data Protection Unit at the Department of Children and Youth Affairs at the following address:

Department of Children and Youth Affairs,
Block 1,
Miesian Plaza,
50-58 Baggot Street Lower,
Dublin 2
D02 XWI4, Freepost F5055
Tel: 01-6473000
Email: sar@dcya.gov.ie

You can make a request directly to a member of staff on the Growing Up in Ireland Survey Team. In such instances they will immediately forward the request to the Department's Data Protection Unit, which will follow up with you on any requirements.

In order to facilitate processing of your request and the timely retrieval of your personal data, you may be asked to provide the following details:

- Your full name
- Details of the personal data that you are requesting
- Any other relevant information that will assist in responding to your request, e.g. the time period for the data you are requesting access to.
- The form you wish the data to be provided to you in (e.g. by letter, email etc).

Identification

In order to ensure that personal data are not disclosed to the wrong person, you will need to provide proof of identity before your request can be processed.

If a request is being made on your behalf by a third party such as a solicitor, authority and verification will be sought.

For further information on data protection see <http://gdprandyou.ie>.

How will the information be provided to you?

Where you make the request by electronic form, where possible the information shall be provided to you by electronic means, unless you request otherwise.

What are the timeframes for dealing with your personal data access requests?

Your request must be responded to within 1 month from the date of validation of the request and your identity. The period may be extended by a further 2 months, where necessary, taking into account the complexity and number of requests. In this case, we will inform you of any extension within 1 month of receipt of the request, and the reasons for the delay.

If we do not take action on foot of your request, we will inform you without delay and, at the latest, within 1 month of receipt of your request, of:

- The reasons for not taking action
- The possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

What are the charges?

There is no charge for your Subject Access Request.

However, if your request is considered 'manifestly unfounded or excessive' (for example excessive repeat requests or where the problems associated with identifying you as an individual from a collection of data are too great) we may:

1. Charge a reasonable fee, taking into account the administrative costs of providing the information/taking the action requested; or
2. Refuse to act on your request.

Right to lodge a complaint to the Supervisory Authority

Under data protection legislation you have a right to lodge a complaint with the Data Protection Commission if you consider that processing of your personal data is contrary to data protection law. The contact details of the Commission are

By post: Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois.
By e-mail: info@dataprotection.ie
By phone: 0761 104 800 or lo-call number 1890 252 231
Online: <https://www.dataprotection.ie/>