

**The Suffolk Office of Data & Analytics (SODA) Privacy Notice - how SODA uses your personal information**

**What is this document for?**

This privacy notice provides information on how SODA uses your personal information. By ‘use’ we mean the various ways in which it may be processed including storing, analysing, and sharing.

We also provide further details on

* who we are.
* where we source data.
* how we use data, and for what purposes.
* how and when we share data.
* how long we use data for.
* how we make decisions around data.
* your rights under the General Data Protection Regulation (GDPR) / Data Protection Act (DPA) and how to exercise them.

**Who are we?**

SODA is a collaboration between Suffolk's local government bodies, police, and healthcare board. SODA is not a separate legal entity and has no commercial objectives.

SODA creates multi-organisational, actionable insight from otherwise siloed information, by joining up and analysing local data and where necessary blending it with other local and national data sources.

This joined-up evidence base enables better decision making, enhances policy, and improves service design and delivery, ultimately working to benefit the lives of Suffolk residents.

Collaborative arrangements include sharing data, sharing the expertise of analysts and those with allied skills in Information Technology, Information Security, and Information Governance. SODA also shares some of the technologies, such as analytical platforms data products, analytical and insight reports, and dashboards.

**Where do we source the data?**

SODA partners collect data every day as part of delivering their statutory services and for a range of lawful purposes. Each SODA partner has its own privacy notice, detailing the categories of data and how these are used.

Data shared amongst partners through SODA is always risk assessed by a Data Protection Impact Assessment (DPIA), which also outlines the agreed secure means of transferring and analysing the data.

**How do we use the data and for what purpose?**

Relevant data is sourced from SODA partner organisations and brought together for analysis.

Each purpose is risk assessed in terms of its impact on privacy and security. Sometimes there may also be an ethical dimension which is considered by an independent panel.

The default position is that the data is de-identified or anonymised at the earliest opportunity. This means personal identifiable information is removed from the data to protect privacy which in turn means that those analysing and using the data cannot identify people.

The exception to this rule is where data is used for the direct support of individuals, for example, in the event of a crisis such as flooding, a pandemic, or other emergency. In an emergency, data from different public bodies may be used to prioritise people to provide assistance.

Recent SODA projects which have used data from partner organisations include:

* Domestic violence – understanding its prevalence, how/where individuals go for support, how different organisations respond and how we can better plan services.
* Covid19 pandemic – understanding which persons needed specific help because of their circumstances such as age, mobility, health conditions etc.
* Serious Violence – there is a statutory Duty for a range of public bodies to share data so that the prevalence of serious violence can be understood, and support joined up, multi-agency approaches to reducing serious violence and improving support services.

**How and when do we share data?**

SODA receives partner data, completes the analysis, and then shares analytical products, such as charts, maps, reports with partner organisations. None of these contain any personal data or anything disclosive which could identify living persons.

The exception is where it has been agreed to share data for direct support, when names, addresses and other attributes may be shared with partners.

SODA does not share personal data with any third parties and there is no commercial aspect to its work.

**How long do we use your data for?**

Each SODA purpose has a disposal schedule, this is the length of time the data is used and held for before being securely deleted. When analysing data, it is often useful to have data covering multiple years to understand patterns over time, but no data is kept longer than necessary.

**How do we make decisions around data?**

The choice of which projects to prioritise are taken by Suffolk’s Chief Officers Leadership Team and the SODA Partnership Executive Group. These decision makers are assisted by the SODA Partnership Management Group, which consists of subject matter experts.

A small team of analysts and security/privacy specialists conduct the day-to-day work and are currently hosted out of Suffolk County Council on behalf of all SODA partners.

SODA produces the evidence base for its partners to develop and improve policy and services. In some cases, data may be used to identify persons who can then be prioritised for support.

Technology, such as data matching software, may be used in SODA’s work and is guided by an Ethical Data Stewardship Charter.

**Your rights**

SODA work is not based on the consent of individuals, but other lawful bases under GPDR/DPA, since it falls within normal business of its partner organisations and more usually with a statutory basis underpinning the work.

However, the people the data relates to (‘data subjects’) have important rights. These include (list not exhaustive):

* The ability to request for copies of data held about you, along with any explanation of what technical codes and jargon means.
* The ability to request for data processing to cease (meaning the organisation processing must respond and cite the lawful basis and what steps they are able to take to deal with your request).

For a full list of rights and guidance see the [Information Commissioner’s Office](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/) web pages.

If you wish to raise an issue with SODA about privacy or security concerns, please contact SODA@suffolk.gov.uk.