

# Privacy Notice for BDUK Hubs: Evaluation of Impacts and Benefits



## Important details about Winning Moves

Established in 1995, Winning Moves Ltd undertakes research and evaluation for government, publicly funded and other organisations. We primarily operate as a Data Processor – however, on occasion, we may operate as Data Controller (either singularly or joint) depending on the nature of our work.

- > Company number | 03069806
- > Address | Winning Moves, 102 Colmore Row, Birmingham, B3 3AG, England
- > Phone | 0121 285 3800
- > Email | [info@winningmoves.com](mailto:info@winningmoves.com)
- > Information Commissioner Office Registration no | Z6399957

### Our commitment to your privacy

Winning Moves Ltd takes your privacy very seriously and we are committed to protecting your personal information and the information you provide whilst conducting research with us. Please read this Privacy Notice carefully and contact us with any questions.

### We are committed to meeting relevant laws, codes, registrations and standards



The UK General Data Protection Regulation (GDPR)



Data Protection Act 2018

Data Protection Act 2018



Market Research Society (MRS) Code of Conduct



ISO20252:2019 – the International Quality Standard for Market, Opinion and Social Research



Information Commissioner Office Registration no | Z6399957



Cyber Essentials

As a Market Research Society Company Partner, you can trust that your personal information will be treated with respect, and it will only be used for the purposes that we inform you about. It is not our aim to sell or promote anything. We conduct market research using scientific methods and we commit, in obtaining your co-operation, not to mislead you about the nature of the research or how the findings will be used. You can verify that we are a bona fide market research consultancy by contacting the Market Research Society (MRS) on freephone 0500 396 999.

## Purpose

### Background

GigaHubs ('Hubs') is one of the products Building Digital UK (BDUK) is using to deliver the government ambition of gigabit capabilities across the UK by 2030. BDUK is an executive agency of the Department for Science, Innovation and Technology (DSIT). The product is being used by BDUK to invest in gigabit capable broadband infrastructure and connections with the aim of accelerating local and national rollout.

BDUK has commissioned an independent evaluation of the BDUK Hubs programme. The evaluation is being led by Belmana and supported by Winning Moves and Hatch. The evaluation is to help BDUK assess the impact of the Hubs programme.

We will use two approaches for the evaluation:

- > 'Survey' - where libraries will be invited to take part in an online survey
- > 'Interview' - where libraries will be invited to take part in a longer in-person discussion with a member of the research team

### Data controller and data processors

For the purposes of this project:

1. BDUK is the data controller
2. Winning Moves is the data processor
3. Belmana is also a data processor

Data will be shared with Belmana by Winning Moves, via the agreed data sharing method. All data will be transferred securely using either SharePoint or Quatrix.

### Type of data that will be processed

For this project, we may process the following types of personal data:

1. Simple data including your name, phone number, e-mail address, employment category / job title
2. Behavioural data including respondents views on the observed benefits regarding broadband upgrade in the local community / public services.

### How we get the personal data we process

Most of your personal information is provided through the following ways:

- > Your contact details were obtained from the public domain, BDUK, or the local authority implementing the GigaHubs programme in your area.
- > If you take part in a survey, additional data will be collected from you directly through your survey responses.

### The legal basis for processing your personal data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

3. Public task: your contact details may have been obtained from the public domain. Where they have been shared via referral from BDUK or a local authority, as BDUK require us to process your personal data to perform a public task. In this instance, it is to enable them to better understand the impact that the Hubs programme is providing to recipients.
4. Consent: prior to commencing an interview with you, we explicitly seek your consent to collect and process your personal data. Informed consent is always collected by way of an affirmative action such as selecting 'next' to continue with an online survey, a recorded verbal agreement when taking part in an interview, or an agreement in writing indicating that you would like to proceed with the research. You can withdraw your consent at any time by informing the interviewer or emailing [dataprotection@winningmoves.com](mailto:dataprotection@winningmoves.com)

### How we will use your personal data

- > If you take part in a survey, your data will be pseudonymised to analyse the survey responses. This means that your name and your library branch name will not be included in the dataset used for analysis. Instead, your survey responses will be given an alphanumeric code to indicate the local authority in which your library is based. For example, "GLOUC006".
- > Personal data will not be included by Winning Moves or our partner organisation, Belmana, when we produce a report on the survey findings. Our report will not attribute survey responses to named individuals or specific library branches in the research. However, we may describe the local authority in which a library is located. For example, "only one of the twelve libraries with pending hub connections in Gloucestershire rated this issue as very important."
- > If you take part in an interview, your name and the name of the specific library you work for will not be used in reporting. However, we may refer to the wider local authority in which your library is based and describe your role. For example, "Library branch manager, village in Gloucestershire".

As part of this research, we may want to re-contact people who have taken part in a survey or interview to clarify any outstanding queries.

If you take part in a survey, personal data may also be used for quality control purposes: we may telephone you to validate your responses.

In both these cases, we will ask for your permission to re-contact you.

### Will we share your personal data?

If you take part in an interview, your personal data (name, organisation, job role and contact details) will be shared with the following third parties:

- > Our Partner organisation, Belmana who are leading on this evaluation. Belmana will use this information so that they can understand who has had the opportunity to provide insights about the GigaHubs rollout in each region.

In addition, the transcript of your interview may be shared with Belmana so that they can draw on the evidence you provide when they write up a report on the evaluation findings.

If you take part in a survey, your personal data (name, organisation and contact details) will be shared with the following third parties:

- > Our partner, Belmana, will have access to your responses in their pseudonymised format so that they can analyse the survey data when producing the evaluation report.
- > Our sub-processors who may carry out some of the processing on Winning Moves' behalf, and under Winning Moves control. These processors are:
  - IdSurvey, a service provider who hosts our survey platform.

Any third party must also process the personal information as set out in this Privacy Policy and as permitted by the UK's Data Protection Act/laws.

### How we will keep your personal data

Your information will be securely stored. We will protect the confidentiality of your information in accordance with our normal data handling procedures and all legal requirements. We will not use it for any purposes other than those which are set out in this Notice. We are committed to keeping personal data secure and take all reasonable technical and organisational measures to protect personal data from loss, misuse or alteration.

The length of time we hold your personal information varies depending upon the type of information and its use. We will hold your personal information on our systems only for as long as necessary to provide research services to our clients, and will anonymise data where possible, securely deleting personal data associated with it at the earliest possible point. For this project, we intend to keep your personal information for six months after completion of the project (anticipated to be June 2027). We will then dispose your information by secure digital deletion.

### Where your personal data will be processed

Your data will not be transferred or stored outside the UK or European Economic Area.

## Your Rights

Co-operation in research is voluntary at all times regardless of what the research is about or who our client is. You are entitled at any stage to ask that your personal data, or part or all of the record of your survey responses, be destroyed or deleted and we will carry out such a request. This can be requested during the interview itself or afterwards. You have the right to access any personal data that we process relating to you. We may ask for verification of your identity before releasing any information to you.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us:

#### Phone

0121 285 3800

#### Email

[dataprotection@winningmoves.com](mailto:dataprotection@winningmoves.com)

#### Address

Winning Moves  
102 Colmore Row  
Birmingham  
B3 3AG

You can also complain to the ICO if you are unhappy with how we have used your data:

Phone

0303 123 1113

Website

<https://www.ico.org.uk>

Address

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