

Introduction

Verian is an independent research agency conducting research to understand the impact of the DevelopMentor training programme delivered by Workwhile (formerly known as the London Programme Collaboration). This research is funded by the Youth Futures Foundation. Verian is a Data Controller for all personal data it receives and collects for this project.

We ask you to read this privacy policy carefully.

For the purpose of this Policy, the definition of 'personal data' is information which relates to and can identify a living individual.

Verian will share some personal data with the Institute for Employment Studies (IES), who are helping deliver the evaluation and who will be an independent Data Controller of all personal data it receives and collects for this project. You can find IES' Privacy Notice [here](#).

Your personal data alongside the answers you provide in your survey with Verian, will be securely shared with the project funders, Youth Futures Foundation, to be held in a data repository/ archive for the purposes of evaluation and research to help young people. Data will only be shared where it is necessary for the purposes stated in the Youth Futures privacy notice, which you can read [here](#). To fulfil these purposes, the data may also be shared with other organisations who manage the archive, evaluate outcomes, conduct further research or link to data that is associated with Youth Futures' vision and values. Youth Futures Foundation will be an independent Data Controller of all personal data it receives for their archive and will process your data in accordance with data protection law which includes keeping it secure and only using it where there is a fair and lawful basis to do so. For more information about the Youth Futures data archive, and their Privacy Policy, please see [here](#).

Lawful collection and use:

This Policy explains how we collect, store and use the personal data you provide when taking part in this research.

We will clearly identify ourselves and explain the purpose(s) of our contact and, if applicable, the purpose for our collecting your personal data. You may decline to answer any questions or withdraw from participation in a survey at any time.

When we contact you, in relation to this research project, we do so for the following purposes:

Case	Purpose	Data collected/ processed	Legal Basis
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Inviting you to participate in our surveys or interviews	To provide participants in the evaluation the opportunity to share their views in our surveys or interviews.	Name, email address used at work (employer-provided)	Legitimate interest or consent (as applicable). We have a legitimate interest to contact individuals participating in the DevelopMentor training programme to invite them to participate in our surveys or interviews. Your employer has your consent to share your contact details with Verian so we may invite you to participate in a survey or interview.
Surveys & interviews	To understand your views about DevelopMentor or to understand your behaviour in different situations. To administer participation e.g. prize draws, incentives, pre-tasks etc. To re-contact participants e.g. for ongoing and follow-up surveys.	Unique identifier, contact details, email address, postal address, voice, image, opinion	Voluntary participation in a survey or interview whereby we ask for your consent to use your personal data.
Quality control	To validate answers you gave in a recent survey we conducted.	Unique identifier, contact details, email address	We have a legitimate interest to contact a sample of individuals who

			participated in our surveys to validate their answers.
Fraud Protection	Protection of our business interests against fraudulent behaviour.	IP addresses, browser specifications, device specifications, postal addresses, email addresses	Legitimate interests – we have a legitimate interest in protecting our business against fraud or other prohibited behaviour.
Survey Participation Uniqueness	Prevention of multiple entries in surveys by the same individuals.	IP address, browser specifications, device specifications	Legitimate interests – we have a legitimate interest in preventing multiple entries by the same individual.
Safeguarding and prevention of harm. Prevention or detection of unlawful acts.	To protect the safety and wellbeing of participants or the wider public.	Contact information (may include health data).	Recognised legitimate interest to protect our participants and the wider public. We may have a legal obligation to report potential criminal acts.

We will never misrepresent ourselves or what we are doing. If you receive an email that concerns you, purporting to be from us or IES, please let us know as shown below in 'How to contact us.'

We have contacted you to take part in this research because your employer indicated you or your manager are taking part in the DevelopMentor programme. Your employer shared your contact information with Workwhile, Verian, and IES, and confirmed they had the appropriate legal right to share this information. Participation in any of our research activities, such as surveys and interviews, is voluntary and we will only collect further information about you if you explicitly tell us you are happy for us to do so.

Your data will only be available to the research teams and only used for research purposes. We will be writing up our findings in a published report for the Youth Futures Foundation. However, this will not include identifying information without your express permission.

Recordings:

If you are taking part in a research interview or focus group, with your permission, an audio or video recording may be made. You do not have to agree to any recording, and your express permission will be sought before a recording is made.

Third parties and data transfer across borders:

We collect and process personal data for the purposes described above, and Verian may share your contact information with IES to allow them to contact you about interviews. Your personal data alongside the answers you provide in your survey or interview with Verian, will be securely shared with the project funders, Youth Futures Foundation, to be held in a data repository/ archive. For more information about the Youth Futures data archive, and their Privacy Policy, please see [here](#). We will not share or sell your personal data to any other third parties, unless it is required by law, or you have agreed otherwise.

Your personal data may be collected, stored, transferred or processed by companies or 3rd party service providers for survey-related purposes, such as data processing, and fulfilment of prize draws or other incentives both within and outside the UK and the EEA. All 3rd parties are contractually bound to keep any information they collect and disclose to us or, we collect and disclose to them, confidential and must protect it with security standards and practices that are equivalent to our own. If your personal data has been transferred to, stored, or otherwise processed to a territory outside the UK or EEA (as applicable) and that territory has not been recognised as providing an adequate level of protection of personal data, we will put in place an appropriate legal safeguard. For example, standard contractual clauses approved by the European Commission and other relevant authorities, working with parties that have implemented binding corporate rules or other intra-group processes, obtaining your consent to transfer personal data, where the transfer is necessary for the performance of a contract between us or where a contract was entered into on your behalf, or where the transfer is necessary to establish, exercise or defend legal claims.

Confidentiality, security and industry requirements:

We have appropriate technological and organisational measures in place to protect your personal data and take all reasonable steps to ensure your personal data is processed securely. All information you provide us is stored in secure servers and environments. Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we will take reasonable steps to ensure our systems are secure.

All our third-party contractors, site service providers and employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

We may use Artificial Intelligence (AI) in connection with the processing of your personal data (e.g. for data analysis and data processing) where this is deemed to

be an appropriate use in accordance with our internal AI Policy. Where we use AI, we ensure processing is carried out in accordance with applicable data protection laws, including ensuring transparency, fairness, and appropriate governance controls and safeguards to protect individuals' rights and interests. We always ensure human intervention is in place when using AI tools to review and approve any outputs. We do not use your personal data for training external models, and we use anonymised data whenever possible.

We adhere to the following industry requirements:

- The UK GDPR, UK Data Protection Act 2018, the EU GDPR, and any subsequent legislation, which may be amended from time to time
- We follow the MRS and ESOMAR professional Codes of Conduct
- We hold Market Research Society (MRS) Company Partner Accreditation

We combine your survey responses in a given survey with the responses of all others who participate and report those combined responses to the client that commissioned the study, unless one or more of the following criteria are met.

The only exceptions when we may disclose your personal data or survey responses to third parties are as follows:

- You request or consent to sharing your identifying information and/or individual responses with a third party for a specified purpose;
- When we provide your responses to a third-party processor who is contractually bound to keep the information disclosed confidential and use it only for research or statistical purposes;
- Where such disclosure is required by law or under exceptional circumstances such as for safeguarding reasons.

Cookie disclosures (only for online survey participants):

Cookies are small text files stored on your computer or device by a website that assigns a numerical user ID and stores certain information about your online browsing. They are used by web developers to help users navigate their websites efficiently and perform certain functions. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server.

We do not use cookies on standard online in-house surveys. Where cookies are required by a partner's platform, this is notified by the platform privacy notice/policy. For behavioural tracking surveys, we use optional cookies / software applications, but only if you have given your explicit consent to such cookies / applications.

As is true of most online surveys, we gather certain information automatically and store it in survey data files. This information may include things like Internet Protocol address (IP address), browser type, Internet Service Provider (ISP); referring/exit pages, operating system, and date/time stamp.

We use this automatically collected information to analyse trends such as browser usage and to administer the site, e.g., to optimise the survey experience depending on your browser type. We may also use your IP address to check whether there have been multiple participations in the survey from this IP address.

Accuracy:

We take all reasonable steps to keep your personal data accurate, complete, current and relevant, based on the most recent information provided to us. If you would like to update your personal data, please contact us using the details provided below.

We rely on you to help us keep your personal information accurate, complete and current by answering our questions honestly and you are responsible for ensuring that the data controller (which may be us or - more often - our client) is notified of any updates or changes to your personal data.

Sensitive data collection:

In your interview you may disclose personal data that is classified as 'special categories' of personal data. This includes racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. You will always be able to choose whether or not to provide this data to us.

Rights of individuals:

To request access to personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in "How to Contact Us." When you make a request, you should indicate your email address and the name of your employer.

If you contact us using an email address or contact details for which we do not hold a record of, you will also need to provide a copy of a valid government issued or official identification (such as drivers licence or passport).

Depending on the legal basis upon which your personal data is collected, your rights in relation to your personal data may include:

- Right to change your mind and to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data
- Right to not be discriminated against for exercising any of the rights available to you under applicable data protection laws

If necessary, we will notify any other parties such as our suppliers or service providers to whom we have transferred your personal data of any changes that we make when you make a request. Note that while we communicate to these third parties, we are not responsible for the actions taken by these third parties to answer your request. You may be able to access your personal data held by these third parties and correct, amend or delete it where it is inaccurate.

Data storage and retention:

We keep your personal data only for as long as is necessary for the purposes for which we are using it, in this case until the data is uploaded to the Youth Futures Foundation data archive. We expect all personal data held by us will be deleted by February 2028. Personal data that is no longer required will be disposed of in ways that ensure their confidential nature is not compromised.

As part of the Company Business Continuity plan and as required by ISO27001, ISO9001, ISO20252 certifications where held, and in certain instances the law, our electronic systems are backed up and archived. These archives are retained for a defined period of time in a strictly controlled environment.

Notification of material changes:

We will keep this privacy policy under regular review, and it may be amended from time to time. We will always have the most up-to-date policy on this web page. We will record when the policy was last revised.

Date created: 06/08/2026

Last revised: 06/08/2026

How to contact us:

If you are not happy with the way we have processed your personal data, we would like a chance to put that right.

Please contact us, referencing "DevelopMentor" at **UK-Compliance@veriangroup.com** or in writing to Compliance Officer, Verian, 4 Millbank, Westminster, London, SW1P 3JA, and we will have somebody contact you.

We will investigate all complaints and attempt to resolve them and we will amend our policies and procedures as required.

If you have any questions or comments, you may contact Verian's Data Protection Officer at **compliance@veriangroup.com**

If you would like to contact IES about their research activities, please find their contact information in their Privacy Notice [here](#).

Complaints and country specific disclosures:



If you are not satisfied with how we handle and protect personal data, you have the right to complain to a supervisory authority such as the Information Commissioner's Office in the UK whose details can be found at www.ico.org.uk

We are Verian. Our registered name and address are:

- Verian Group UK Limited
4 Millbank,
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SW1P 3JA
- UK Companies House number 13663077