

## **HOLIDAY ACTIVITIES AND FOOD (HAF) PRIVACY POLICY**

Last Updated: November 2023

This privacy policy provides information about how we use the data that you provide to use when participating in the Holiday Activities and Food (HAF) Programme provided by Dudley Metropolitan Borough Council and should be read in addition to our full data protection and information governance policy below.

This privacy policy will cover:

- Purpose for processing
- Personal information collected and lawful basis
- Who we may share your information with
- How long we will hold your information
- Your information rights

### **1. Purpose for Processing**

We collect and process information relating to you, your child or children, or your organisation's participation in the HAF Programme. This information will be used for the following purposes:

- Self-service booking of children and young people onto activities that are running across Dudley MBC as part of the HAF programme. This enables your children to attend the selected session, receive an appropriate meal, and that the provider can be made aware of any medical conditions or allergies to keep children safe and well.
- Provide an account facility for you to make and track multiple bookings onto activities
- Enable your organisation to support and participate in the programme, including applying for funding to run activities
- Help us to develop and improve our services
- Complete statistical returns and reports on the HAF programme in Dudley MBC to the Department for Education (DfE)

### **2. Personal information collected and lawful basis**

The programme processes personal information to deliver the holiday activities which is relevant to individual bookings and children which may include, but is not limited to, the following personal data:

- Your name
- Your address
- Your contact details
- Name and ages of children taking part in activities
- Ethnic origin (for equality monitoring purposes only)
- School attended by the children
- Free School Meal eligibility
- SEND information and young carer information
- Information about other family members including siblings, parents, carers

- We may also process some special category (sensitive) information, which is relevant to individual children and may include some of the following but is not limited to:
- Any special dietary requirements, medical conditions, health needs, or allergies of children attending activities.
- The legal basis for processing this personal data is:
- Necessary for the performance of a task carried out in the public interest or in the exercise of our official authority.
- The special category condition for processing is:
- Explicit consent given on the booking form for this data to be used for the purposes detailed in this privacy notice.

### **3. Who we may share your information with**

Your child's name, date of birth, school and home postcode and will be collected and passed to Dudley Metropolitan Borough Council and will be used to check your child's eligibility to the scheme. The information will be used for statutory returns to the Department for Education and may be shared with other organisations to support the monitoring of the HAF programme. This information may also be shared with other council services or partner organisations to help us to identify services or benefits you may be entitled to or interested in.

We may need to share the personal information you have given to us or we've collected about you with partner organisations where relevant to the individual and/or their care provision. These include but are not limited to:

- Dudley Metropolitan Borough Council, who hold overall responsibility for delivery and reporting of the HAF programme.
- Booking Lab, who provide the online booking system.
- Department for Education, who provide the grant funding for the programme.
- Relevant provider of the activity or activities booked.

Information will only ever be shared when it is strictly necessary to help us provide effective services and you may have the right to refuse. We will not pass it onto any other parties unless required to do so by law or in all reasonable circumstances the disclosure is fair and warranted for the purposes of processing or subject to a data protection exemption.

We have specific data sharing agreements in place with local agencies and sometimes the law requires that we may have to pass your details on to a third party, for example, to prevent crime.

### **4. How long we will hold your information**

We will keep your data until the end of the HAF programme including the monitoring requirements we have to undertake for the Department for Education.

Please note stated retention periods may be subject to any legal holds imposed under the Inquiries Act 2005 that may concern the information and override standard retention periods.

### **5. Your information rights**

You are entitled to a copy, or a description, of the personal data we hold that relates to you, subject to lawful restrictions. Please contact [enquiries@hafdudley.co.uk](mailto:enquiries@hafdudley.co.uk) to find out how to make a request.

You may be entitled to rectification, restriction, objection, and erasure of your personal information depending on the service and legal basis. Please in the first instance contact [enquiries@hafdudley.co.uk](mailto:enquiries@hafdudley.co.uk) to exercise these Information Rights.

Please see our overarching data protection and information governance policy for further information about our processing, contact details and information about how to make a complaint about your information rights.

## **DATA PROTECTION & INFORMATION GOVERNANCE POLICY**

Last Updated: April 2023

Sutton Croft Ltd is registered with the Information Commissioner. Registration reference ZA762969.

### **1. Data protection principles**

Sutton Croft Ltd (the Organisation) is committed to processing data in accordance with its responsibilities under the DPA.

DPA requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

### **2. General provisions**

- a. This policy applies to all personal data processed by the Organisation.
- b. The Responsible Person shall take responsibility for the Organisation’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Organisation shall register with the Information Commissioner’s Office as an organisation that processes personal data.

### 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Organisation shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Organisation shall be dealt with in a timely manner.

### 4. Lawful purposes

- a. All data processed by the Organisation must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Organisation shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Organisation's systems.

### 5. Data minimisation

- a. The Organisation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Where the personal data of children and young people may be processed for the Organisation's contracts on the Holiday Activities & Food Programme, the specific approval of the Responsible Person is required before any data collection shall take place.

### 6. Accuracy

- a. The Organisation shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. The Organisation will undertake an annual review of all data held and satisfy itself that the data continues to be required for the administration of its contracts or any other legal requirements.

### 7. Archiving, removal and information governance

- a. To ensure that personal data is kept for no longer than necessary, the Organisation has an information governance policy for each area in which personal data is processed and review this process annually.
- b. The information governance policy advises what data should/must be retained, for how long, and why.

### 8. Security

- a. The Organisation will ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.

- d. Appropriate back-up and disaster recovery solutions are in place.

#### 9. Home working

- a. The Organisation has home working policies in place to manage the risks of employees accessing and processing data while working from home.
- b. Employees are required to work in a secure environment, ensuring non-employees can not access or view any company data.
- c. The company provides IT equipment to ensure employees are not using their personal devices for work purposes.

#### 9. Breach

Any event involving a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data will be reported immediately to the Responsible Person. They shall have responsibility to promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

--- END OF POLICY ---

#### Definitions

- **Organisation** means Sutton Croft Ltd (Company No: 09530066) of 86-90 Paul Street, London, EC2A 4NE.
- **DPA** means the Data Protection Act 2018 which implements the EU's General Data Protection Regulation.
- **Responsible Person** means the Director, Jonathan Ash-Edwards, who can be contacted at [jonathan@suttoncroft.com](mailto:jonathan@suttoncroft.com)
- **Register of Systems** means a register of all systems or contexts in which personal data is processed by the Organisation.