Holiday Activities and Food Programme Privacy Notice

version v1.1

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on this web page. This Notice was last updated on 14 June 2024.

This privacy notice provides information about how we use the data that you provide to us when booking on the Holiday Activities and Food (HAF) Programme provided by Worcestershire County Council and should be read in addition to Worcestershire County Council's <u>Full Privacy Notice</u>.

The privacy notice will cover:

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

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:

- To determine the eligibility of children for the Holiday Activity Fund (HAF) Programme
- Self-service booking of children and young people onto activities that are running across Worcestershire 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 Worcestershire to the Department for Education (DfE)

Personal information collected and lawful basis

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



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- Your name
- Your address
- Your contact details
- Name and ages of children taking part in activities
- 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, or allergies of children attending activities
- Ethnicity (for equality monitoring purposes only)

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
- necessary for reasons of substantial pupil interest (statutory etc. and government purposes) set out in Schedule 1 of the DPA 2018 condition 8 equality of opportunity or treatment

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

Who we may share your information with

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:

- Sutton Court, who are administering and coordinating the programme on our behalf
- BookingLab, who provide our online booking system
- Department of Education, who are providing the grant funding for the programme
- Commissioned providers 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.

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. More information about our retention periods can be found in our <u>summary Disposal Schedule</u>.

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.

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 go to our <u>Make a Data Protection Request webpage</u> 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 <u>dataprotection@worcestershire.gov.uk</u> to exercise these Information Rights or call the main Worcestershire County Council contact telephone number of **01905 765765**.

Please see our overarching Privacy Notice (<u>http://www.worcestershire.gov.uk/worcestershire-county-council-full-privacy-notice</u>) for further information about our processing, contact details and information about how to make a complaint about your information rights.