

**Hampshire County Council  
Holiday Activities and Food Programme  
HAF System  
Privacy Notice for Parents and Carers**

**Why do we collect and use this information?**

Hampshire County Council ('County Council') is the Data Controller for the purpose of collecting and using information from you as the parent of a participant on a Holiday Activities with Food (HAF) scheme to fulfil Department for Education requirements for the HAF Programme to provide healthy food and enriching activities to children during the summer and Christmas school holidays.

We collect information about you and your child or children (including personal data) to manage delivery of the HAF Programme. We will collect the personal data from you that we need to in order for you to book a place for your child or children on a HAF scheme, including medical, educational, dietary and health related information that will enable the provider of the scheme that you book to meet your needs.

We also hold this personal data securely and use it to:

- verify your personal data against the eligibility requirements of the scheme;
- book your child onto the scheme through an appropriate provider;
- ensure the placement meets your child's needs from a dietary, medical and educational perspective;
- contact you regarding your Holiday Activity and Food Programme funding or claim made by your provider.
- contact you about future provision or other support information.
- review attendance data from the scheme to assess the uptake from the public;
- provide statistical information to schools;
- evaluate and improve the service you receive from the scheme including the provision of feedback opportunities;
- analyse performance of the programme;
- provide statutory returns to the Department for Education regarding the attendance of the scheme;
- ensure compliance with our obligations under the accuracy principle of the General Data Protection Regulation (Article (5)(1)(d)), making sure our records about you and your scheme are up to date.

**Who is the data processor?**

Coordinate Sport processes data on behalf of the County Council by providing a system that hosts your personal information. The County Council uses this system to collect information provided to us, as identified under this privacy notice. Information that you input on the Coordinate Sport system will be shared with the HAF provider delivering the scheme you wish to book a place on for your child or children. The HAF provider is a data controller for this information for the purpose of delivering the HAF scheme for your child or children.

The following sections provide further detail around the information we process, setting out what allows us to do this (lawful basis), who we may share it with, how long we keep it for, alongside identifying any rights you may have and who to contact if you think we're not handling your information in the right way.

## **The categories of information that we collect, hold and share**

We collect different types of Personal Data and Special Category Data depending on the activity being undertaken.

For providing HAF bookings and managing the HAF Programme, we process:

- your and your child's name;
- the name of your child or children's name and date of birth;
- your home postal address;
- the school your child attends or attended;
- your contact information, e.g. phone number or email address;
- educational, health, SEND, social care or care needs of your child or children;
- dietary needs of your child or children;
- other personal information relating to participating children that you may wish to share;
- details sessions booked and attended; and
- any feedback, complaints and queries you have provided

## **The lawful basis on which we use this information**

We collect and use the information you provide us with ensuring that we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA2018) requirements for processing through:

Article 6(1)(a) Consent – where you have given us clear consent for us to process your personal data for the purposes outlined above;

Article 9(2)(a) – where you have given us explicit consent to the processing of your special category data for one or more of the specified purposes above.

## **Storing and Securing Data**

Any personal information held about you on the HAF System will be maintained as a record in the system and held in line with the Council's retention policy and as required by the Department of Education for audit purposes.

Correspondence and communications received (such as emails from the HAF scheme owner or manager) will be stored within the County Council's Document Management System (DMS). No paper files are held. The information held within the County Council's DMS will be kept in line with our retention schedule and then deleted as appropriate. The County Council's DMS is hosted by the County Council in secure UK based data centres, which are on site.

The County Council takes its data security responsibilities seriously and has policies and procedures in place to ensure the personal data held is:

- prevented from being accidentally or deliberately compromised;
- accessed, altered, disclosed or deleted only by those authorised to do so;
- accurate and complete in relation to why we are processing it;
- continually accessible and usable with daily backups; and
- protected by levels of security 'appropriate' to the risks presented by our processing.

The County Council also ensures its IT Department is certified to the internationally recognised standard for information security management, ISO27001.

## **Who do we share information with?**

We do not share information with anyone unless there is a lawful basis that allows us to do so. Your information on the HAF System will be shared with the HAF provider whose scheme you have booked a place on to enable them to meet your child's requirements. The information then shared under a lawful basis will be necessary, relevant and proportional to the task being undertaken and will only be processed in line with the purposes stated above.

### **Requesting access to your personal data and your rights**

Under data protection legislation, individuals have the right to request access to information about them that we hold. To make a request for your personal information please contact the Children's Services Department's Subject Access Request (SAR) Team, whose contact details alongside further information around the process can be found via:

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/accessrecords>

You also have the right to:

- prevent processing for the purpose of direct marketing unless we have your consent;
- object to decisions being taken by solely automated means;
- withdraw consent to share your data;
- ask to have your personal information deleted;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a concern about the way we are collecting or using your personal data, you can raise your concern with us in the first instance or you can go directly to the Information Commissioner's Office, as the supervisory authority, at <https://ico.org.uk/concerns/>.

### **Contact Details**

For further information on how we handle personal information, your data rights, how to raise a concern about the way we are processing your information and the County Council's Data Protection Officer, please see our General Privacy Notice:

<https://www.hants.gov.uk/aboutthecouncil/strategiesplansandpolicies/dataprotection>