

# Extratime Privacy Notice for Children, Young People & Parent Carers

Extratime is committed to protecting your privacy. This Privacy Notice explains how and why we collect and use personal information about yourself and your child or young person. We recommend that you read this Privacy Notice in full so you are aware of your rights under UK data protection legislation, but the main points are:

- Your data is collected and processed so that we can share information about Extratime services, events and fundraising activities. Personal data relating to children and young people using Extratime services and their families is necessary for us to provide appropriate care and support.
- We collect the minimum amount of data we need in order to do this.
- Your data is stored electronically on secure, password protected computers and within Extratime's cloud-based storage. Paper records are in locked filing cabinets.
- We keep your data as required by law and in accordance with a document retention plan.
- We are careful to ensure that we only retain data and contact people who would reasonably expect to hear from us; for example, if they are existing or potential Extratime service users, or people who have attended or expressed an interest in Extratime events or fundraising activities.
- You can ask for your details to be removed from our mailing lists at any time. You are also entitled to a copy of the data we hold about you.
- We will never sell, rent or otherwise distribute or make public your personal information.

## Who we are

Extratime is the Data Controller and is responsible for your personal data. In this privacy notice, whenever you see the words 'we', 'us' and 'our' it refers to Extratime, Registered Charity Number 1116203 and Registered Company Number 04514110. Extratime's ICO Registration Number is Z300959X

If you have any questions in relation to this privacy notice or how we use your personal data please contact Sam Price, Extatime Chief Executive, at:

Phone Number: 01273 420580

E-mail: hello@extratimebrighton.org.uk

Address: Portslade Village Centre, 3 Courthope Close, Portslade, BN41 2LZ

## What type of information we have

We currently collect and process the following information about children and young people:

- Personal information (such as name, date of birth, address, likes and dislikes, emergency contacts)
- Characteristics (such as sex, ethnicity, language, housing and free school meal eligibility)
- Special educational needs and disability information
- Information to enable Extratime to safely support children and young people (such as EHCPs and plans/protocols relating to personal care, behaviour, communication plans and manual handling/hoisting)
- Health and medical information (such as dietary requirements, gastrostomy support, allergies and medication plans/protocols)
- Consents (such as participating in trips, administering medication, emergency medical treatment, taking and use of photos/videos, contacting teachers/other professionals)
- Identity and contact details of school teachers and professionals (such as Social Workers and GP)
- Attendance information
- Accident and Incident reports
- Safeguarding and Child Protection reports and disclosures
- Photographs and video clips



We currently collect and process the following information about parent carers:

- Personal information (such as name, address, contact details, relationship to the child/young person)
- Financial information relating to payment for Extratime services

#### How we get the information

We obtain most information about children, young people and parent carers from parent carers. This is usually via our Parent Carer Portal, although information may also be obtained from emails, telephone calls, written correspondence and face to face.

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the Data Protection Act (DPA) and UK General Data Protection Regulation (GDPR), we will inform you whether you are required to provide certain information to us or if you have a choice in this.

With the relevant consent, we may also ask for information from children and young people's schools/colleges, social workers, medical/health professionals and other professionals involved in their care.

## Why we have the information

Information about children and young people is collected so that Extratime can:

- Register and provide services to children and young people
- Keep children and young people safe and well by understanding their SEND and other support needs
- Meet our health, safety and safeguarding obligations to all children and young people
- Monitor and report on attendance and equalities data
- Fulfil our other legal and statutory obligations regarding record keeping

Parent carer information is collected so that Extratime can:

- Communicate with you about your child or young person
- Keep you updated on important information about Extratime, our services and fundraising activities
- Provide you with access to tools we use, such as the Parent Carer Portal
- Assess the quality of our services

## The lawful basis for processing information

The lawful basis in the DPA and GDPR for Extratime processing personal data is Article 6.1(f): Legitimate Interests. This applies because we are processing your information in the way you would expect us to so we can deliver a service to you and your child or young person.

Where we ask parent carers for specific permissions (e.g. trips, photos/videos etc) the legal basis for this is Article 6.1(a): Consent. Consent can be withdrawn at any time by contacting us. Please bear in mind that consent cannot be retrospectively withdrawn.

We also process what is known a 'special category' data, for example personal data relating to health and ethnicity. As processing of this data is carried out in the course of Extratime's activities, the special category condition Article 9.2(d): Not-for-profit-bodies applies.

#### What we do with the information

Staff at Extratime will have access to your personal data which is relevant to their function and job role. All staff with such responsibility have been trained in ensuring data is processed in line with the DPA and GDPR.



We use the services of other organisations to process your personal data so we can deliver our services, including:

- Service providers who provide IT and system administration services, such as our Parent Carer Portal and Child & Young Person Database.
- Email and document storage systems such as Outlook and SharePoint.
- Online survey tools such as Survey Monkey.
- Card payment providers and accounting platforms such as World Pay and QuickBooks.

We require all organisations who process your personal data to treat it in accordance with the DPA, GDPR and other international laws. We only allow such organisations to process your personal data for specified purposes and in accordance with our instructions and we will always have a legitimate reason for doing so.

As a general principle, we will not share your personal data with other third parties without your permission. There are some exceptions to this:

- To safeguard children and vulnerable adults.
- In response to a court order or other lawful reason, for example the prevention or detection of a crime.
- We share aggregated and anonymised personal data with public authorities when required for purposes of reporting for grant funding and contract delivery.
- We share aggregated and anonymised personal data with other potential or actual donors.

## How we store your information

We use third parties to assist us in processing your personal information, and we require these third parties to comply with our Data Protection Policy and any other appropriate confidentiality and security measures. Any processors who process data outside the EEA have been reviewed to make sure that they have the appropriate safeguards in place for the security of the data.

Throughout Extratime we have put in place significant security measures to prevent your personal data from being breached. This includes your data being lost, used, altered, disclosed, or accessed without authorisation.

We also allow access to your personal data only to those staff and third parties who have a legitimate need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

We take security measures to protect your information including:

- Policies and procedures in place for data protection and information security.
- Implementing access controls to our information technology.
- Appropriate procedures and technical security measures to safeguard your information across all our computer systems, networks, websites, applications, offices and venues.

We will retain your data only for the time we require it for the purposes stated and/or where we have a legal obligation or other legitimate purpose. Our criteria to determine the retention of personal data is contained within the Management Framework for Retention and Transfer Charity Records and Archives June 2019.

## Your data protection rights

Under data protection law, you have rights including:

• Your right of access: you have the right to ask us for copies of your personal information.



- Your right to rectification: you have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure: you have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing: you have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing: you have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability: you have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

If you want to exercise any of these rights please contact us at <u>hello@extratimebrighton.org.uk</u>. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

## How to complain

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data. The ICO's contact details are:

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

Helpline number: 0303 123 1113 https://ico.org.uk/