



## **Sheffield Healthy Holidays Privacy Notice**

Sheffield Healthy Holidays (SHH) is part of the Holiday Activities and Food (HAF) programme funded by the Department for Education (DfE) and is co-ordinated in Sheffield, by Sheffield City Council (SCC).

SHH make free places at holiday clubs available in the Easter, summer, and Christmas school holidays in 2023. These will be made available to children who are eligible for and receive benefits-related free school meals.

There are 105 providers across the city which are charities, schools and sport, arts, and cultural organisations.

Families register directly with a holiday club provider.

We take your privacy seriously and the Sheffield Healthy Holidays programme will only use your personal information for the purpose(s) listed in section (2) below. This notice provides details of how Sheffield City Council's commissioned Holiday Activities and Food programme (HAF) providers collect and use information (data) about you.

The DfE have a separate privacy notice which can be found at [sheffieldhealthyholidays.org/privacydfe](https://sheffieldhealthyholidays.org/privacydfe)

HAF providers will keep your information (data) secure at all times.

### **1. Who we are**

a) Under data protection legislation the DfE is the data controller and SCC is the data processor.

b) The HAF providers commissioned by SCC are data controllers. We have listed the providers in appendix A.

## **2. About the programme:**

This holiday provision is for school aged children from reception to year 11 (inclusive) who receive benefits-related free school meals. Benefits-related free school meals (FSM) are available to pupils if their parents are in receipt of one of the qualifying benefits, and have a claim verified by their school or local authority.

## **3. How HAF providers will use your data:**

The HAF providers, and SCC, need to collect the following information about you/your child:

- Your child's personal details including full name, DOB/age, address, gender, ethnicity, medical, allergen, Special Educational Needs (SEND), behavioral information and school and unique pupil ID (where possible).
- Eligibility for benefits related free school meals (SEND or another Vulnerable Group)
- Emergency Contact Information
- Total number of days you have attended HAF
- An e-mail address if you are happy to be contacted for evaluation purposes and receive further information about the Sheffield Healthy Holidays programme.

The HAF providers use this information to:

- Book your child onto the selected session
- Ensure that your child's needs are met during the session.
- Ensure that your child is appropriately safeguarded during the session.
- Ensure eligibility for the programme.

To enable the programme to provide the service to you your information will be shared with:

- HAF providers of the sessions you have booked on.
- Sheffield City Council
- The Department for Education (DfE).

Sheffield City Council and the DfE will use the information to evaluate the success of the programme and build a case to enable future funding.

Your data may be accessed by the SCC Internal Audit Team to check procedures and combat fraud.

Certain information such as name and contact details are mandatory. Should you decide not to provide any of the information we request you will be unable to book onto any of the sessions.

#### **4. What authority does the HAF programme have to collect and use this information?**

The lawful basis we rely upon for processing your information under the UK General Data Protection Regulation (GDPR) is:

Where information is shared with Sheffield City Council & DfE, the legal basis they rely upon is Article 6(1)(e) which relates to our functions. For the purposes of processing special category data, Sheffield City Council and the DfE meet conditions under Articles 9(1)(g) (substantial public interest) and the condition in the Data Protection Act 2018 Schedule 1, Part 2 (6) Statutory etc and government purposes.

In the case of HAF Providers, the legal basis for processing your personal data is Article 6(1)(a) of the UK General Data Protection Regulation (GDPR) where “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.

The processing of special category data (for example, health information) is necessary for the purpose of supporting children during the activity, where they have special needs. The lawful basis for this processing is Article 9(2)(a) which is that the data subject has given explicit consent to the processing of those personal data for a specified purpose.

#### **Withdrawal of Consent**

Because HAF are processing you/your child’s personal data because you have said they can, you have the right to withdraw that consent at any time.

HAF providers, Sheffield City Council and the DfE may be required to make personal data available to other organisations. These might include contracted partners (who we have employed to process your personal data on our behalf) and/or other organisations (with whom we need to share your personal data for specific purposes). Where we need to share your personal data with others, we ensure that this data sharing complies with data protection legislation.

#### **5. How long will we keep your data?**

Your data will be kept by SCC and the DfE until 31 July 2024 at the latest.

HAF providers will keep information as long as necessary to comply with legal requirements, which relate to accident records, safeguarding incidents and any matters relevant to the submission of their accounts.

## **6. Your rights and your personal data**

Under the UK GDPR you have the following rights:

### **Right of Access**

You have a right of access to the personal information that the Sheffield Healthy holiday programme holds about you, and/or the right to be given a copy of the data undergoing processing.

### **Right to Rectification**

You have the right to request that the Sheffield Healthy holiday programme corrects any personal data if it is found to be inaccurate, incomplete or out of date.

### **Right to Restriction of Processing**

You have the right, where there is a dispute in relation to accuracy or lawfulness of processing of your personal data, to request that a restriction is placed on further processing.

### **Right to Object to Processing**

In certain circumstances, you may have a right to object to the processing of your personal data.

### **Right of Complaint**

Sheffield City Council has a Data Protection Officer who can be contacted about any concerns at: [dataprotectionofficer@sheffield.gov.uk](mailto:dataprotectionofficer@sheffield.gov.uk)

You have a right to lodge a complaint with the Information Commissioner, please find contact details below.

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

## 7. iPal bookings

If you have registered for the programme via the Ipal online booking system:

**The iPAL Booking System provided by Complete Education Solutions (CES) complies** with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). CES is registered with the Information Commissioner's Office (ICO) as a Data Controller (Registration number: ZA788348).

The iPAL Booking System has been purchased by the Sheffield Manor Castle Development Trust (MCDT) for use by HAF providers.

Under data protection legislation, Sheffield City Council and Sheffield HAF providers using the iPAL booking system are joint data controllers. Article 26(1) of the UK GDPR states that 'Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.'

**Manor Castle Development Trust (MCDT) on behalf of all HAF providers are the contact point for your child/you for you to exercise these rights. Contact: MCDT [info@manorandcastle.org](mailto:info@manorandcastle.org)**

## Complaints

You have the right to submit a complaint if you are unhappy with the way your request is handled or disagree with a decision made by **MDCT who are hosting IPAL** regarding your data. In these circumstances you can contact the **MDCT** and request a review of the decision.

If you are not satisfied with the **MDCT** decision you may wish to apply to the Information Commissioner's Office for a decision. See details above.

## 8. Further processing

If SCC wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new Privacy Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

In relation to HAF Providers, they will ask you if they can use your information for a new purpose.

## **9. Changes to this Notice**

We will review this notice regularly, and no later than every year, to ensure it remains accurate and relevant, and unless legislative changes require this sooner.

## Appendix A – HAF Providers

186 <sup>th</sup> Sheffield Scout Group	FURD - Football Unites Racism Divides	Saalik Youth
Active Education	Galeed House	Sam's Space
Active Fusion	Green Estate	Sharrow Community Forum
ActivKidz	Growthatre	Sheffield City Boxing Club
Allama Iqbal Cricket Club	Hadfield Institute	Sheffield City Council (Youth Services)
Amazelabs	Hartley Brook Primary Academy	Sheffield City Trust
An Even Better Arbourthorne	Highfield Adventure Playground	Sheffield Football Club
Arbourthorne Community Primary School	Hinde House School	Sheffield Inclusion Centre
Arbourthorne Pond	Hope Community Foundation	Sheffield Music School
Arches SSP	House Skatepark	Sheffield Roller Hockey Academy
Ashiana Sheffield	Ignite Imaginations	Sheffield United Community Foundation
Aspiring Communities Together	Imagination Gaming	Sheffield Wednesday FC Community Programme
Astrea Academy Sheffield	In2Change	Sheffield Women's Aid
Ballers	Integrating and Inspiring Communities	ShipShape
Bare Project	Isaac Somali Community Association	Site Gallery
Best Start Communities	Jane Collins Yoga	Smart Peepz
Beighton Lifestyle Centre	Jordanthorpe Library	SOAR
Buzz Sheffield	Leisure United	Southey Green Primary School
Care for Young Peoples Future	Lindley Trust	St Patrick's Catholic Voluntary Academy
Chance to Dance	Link Learning	Steamworks
ChilyPep	Links School Sports Partnership	Steel City Sports CIC
Community Wellness Service	Longley 4 Greens	Stocksbridge Community Leisure Centre
ComputerXplorers	Manor After School Kids Klub	Stubbin TARA
Cryo Sports UK	Manor Training & Resource Centre	Studio 54
Curaik Martial Arts	Meadowhead School	The Emaan Trust
Darnall Education and Sports Academy	Montgomery Theatre	The Meadows
Darnall FA	Mr Dan Playtime Workshops	The Montgomery Theatre and Arts Centre
Darnall Library	Mums United	The Terminus
Darnall Wellbeing	Musical Works	U Do it Dance Foundation
Debutots	Noodle Performance Arts	United in Sports (UIS)
Direct Action Training	Oasis Academy Don Valley	Unity Gym Project
E-Act Pathways Academy	Oasis Academy Fir Vale Primary School	Upper Wincobank Chapel
Element Society	Oasis Academy Watermead Secondary School	Voluntary Action Sheffield
Endeavour Training Ltd	On The Move	Voluntary Action Sheffield (New Beginnings)
Everygreen Initiatives	Onboard Skatepark	Well With Nature
Excel Martial Arts	Owler Brook Primary School	Whiteways Primary School
Family Voice	Pinders Dance Production	Windmill Lane Project
Firvale Community Hub	Pitsmoor Adventure Playground	Women of South Yorkshire
Fit Kids Forest Skills	Places Leisure	Yewlands Academy
Flava Fun Parties	Premier Education	Youth Sports Pathway
Flower Estate Family Action	Qualitas Sport	Zest Community
Forest Skills Club	Rainbow Forge Academy	
Forge Youth	Reach Up Youth	
Foxhill Forum	RivelinCo	
	Roshni	