

# PARENT PRIVACY NOTICE

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## 1. What is the purpose of this document?

EFL Trust are committed to protecting the privacy and security of your personal information. This privacy notice describes how EFL Trust process personal information about you, in accordance with data protection legislation. EFL Trust are a data controller. This means that we are responsible for making decisions about the personal data that we process. Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

This notice applies to parents of participants on our Headstart programme.

This privacy statement describes why and how we collect and use personal data and provides information about data subjects' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data. The way we use your information is set out in the relevant sections below. We do not engage in any form of profiling, and we obtain consent for all marketing activities. This notice relates to the information EFL Trust collect for our own purposes.

## 2. Why do we want to obtain data?

Your child has been selected to participate in the 'Headstart' programme commissioned by EFL Trust and funded by Lancashire Teaching Hospitals Charity. They provide funding to deliver a programme that aims to reduce the burden on children's Mental Health services by supporting those in needs through the anxious transition from Primary to Secondary school. We want to obtain your child's data to explore whether the Headstart programme is achieving these intended outcomes. This allows us to continue to increase awareness of the importance of mental wellbeing and transitional support in children, or make changes to the programme, if intended outcomes are not being achieved.

## 3. Where do we obtain your child's personal data from?

The information we process about your child is retrieved from:

- The Community Club Organisation (CCO) that deliver the programme
- Your child

Your child will be provided with a questionnaire at the beginning of the programme at up to three other timepoints during and at the end of the programme. We then compare their pre-programme answers with their other responses. The questionnaires are handed out by the Community Club Organisation (CCO) who deliver the programme to your child. The questionnaires are code named (Pseudonymised) rather than having your child's name on (e.g. A-001). This way, the CCO can pair your child's questionnaires together without immediately identifying information. The code that corresponds to each child will be kept separately by the CCO delivering the project and will be destroyed immediately once the questionnaires are 'matched up' at the end of the programme.

#### 4. What kind of information do we hold about your child, and why?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where an individual cannot be identified (anonymous data). The following categories of personal data are required to register your child onto the programme, and also to evidence that we are meeting funder requirements in providing support to young people (please note this information will only be held on an individual level by the member of staff working with your child, only aggregates will be shared with ELF Trust and the funder):

- Name
- Age
- Gender
- Postcode

There are "special categories" of more sensitive personal data which require a higher level of protection. We will process the following categories of personal information about your child:

- Information that enables us to track your child's journey through the programme (this information allows us to match up your child's two questionnaire responses):
  - We will only receive a code (e.g. A-001) rather than your child's name. The CCO delivering the project will have a record of the corresponding child's name, and will delete this record immediately after the pre and post questionnaires are matched up.
- The questionnaire will ask a range of questions, some of which include special category (health) information. The questions fall into the following categories:
  - Self-reported wellbeing
  - Health and mental health questionnaire data
  - Ethnicity
  - Disability
- When the programme is completed and questionnaires are matched up, this information will remain pseudonymised for most of the limited people who have access to it and will no longer be personal data as your child cannot be identified from it. The secure database which is used to store the data requires a small number of staff with administrative access who would be able to link the child's name to the responses. These staff have signed that they agree to additional requirements to ensure that they will not share the information they have access

to with anyone else. EFL Trust will not share individual outcomes with anybody, instead all information once analysed will be grouped together (aggregated).

## 5. How will this information be processed lawfully?

We will only process personal information when the law allows us to. Depending on the processing activity, we rely on the following lawful bases:

1. Article 6(1)(a) Where you have given clear consent for us to process your child's personal data for a specific purpose.
2. Article 6(1)(F) Where it is necessary for our legitimate interests, your legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests.

Special category data:

In order to process special categories of information about you, we are also required to meet a further lawful basis for processing. The lawful bases relied upon for this are:

- Article 9(2)(a), where you have provided your unambiguous, explicit consent to the processing

We have provided a specific consent form for you to consent to your Child's information being processed by us and by the CCO delivering the programme. If you do not provide your consent, you child will still be able to take part in the programme.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Child's personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Child's personal information without your knowledge or consent, in compliance with the above rules, only where this is required or permitted by law.

## 6. What is 'automated decision-making' and does EFL Trust use it?

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means.

## 7. Is my Child's personal information shared with other organisations?

EFL Trust will not share any identifiable information with any other data controller. Once we have analysed information we will only share aggregated information. For example, we may say 'xx% of participants improved their attitude to physical activity'.

As part of funder requirements, we will be commissioning an external evaluator to conduct the programme evaluation on our behalf. This will require the sharing of outcome questionnaire responses with this party to allow for data to be analysed. These outcome surveys will not contain names of individuals. Your Child's responses will also form one small part of a larger dataset. We expect shared responses to be as anonymous as possible, however at a minimum these will be pseudonymised before sharing. We have provided a specific consent form for you to consent to your Child's information being shared and used as a part of the programme evaluation.

We may share your child's data with third parties who act as data processors on our behalf. Where we employ a data processor, a contract that meets the minimum terms of Article 28 of the GDPR will be in place, to protect the processing of such data. We require third party processors to respect the security of your data and to treat it in accordance with the law.

In exceptional circumstance, we may also need to share your personal information with a regulator, Court, dispute resolution service or to otherwise comply with the law (or to law enforcement authorities where we may be legally permitted to do so).

#### 8. Is my personal information held securely?

We have put in place measures to protect the security of your information, and will review this on an ongoing basis. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Third parties will only process your personal information where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

#### 9. How long is my personal information retained for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We will retain your personal information in an identifiable form for the purposes described in this privacy notice for up to 18 months. At the expiry of the relevant retention period, information will be anonymised.

## 10. What are my rights in connection with my personal information?

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your engagement relationship with us.

Your rights in relation to the processing of your personal data are listed below, however not all rights are absolute, and are only applicable in certain conditions:

- Right to be informed: This privacy notice is designed to ensure you are fully informed about how we will process your data. Where we collect your information for a specific purpose in future (such as a staff survey), we will provide further, specific information to ensure this right is exercised.
- Right of access: (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You can exercise the right of access by contacting the DPO.
- Right to request correction (also known as rectification): This enables you to have any incomplete or inaccurate data about you corrected. If we cannot correct the information for technical reasons, we will append a supplementary statement to the information.
- Request deletion (also known as right of erasure, or right to be forgotten): This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing: this applies where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground. This also applies where we are processing your personal information for direct marketing purposes (and this right is absolute in relation to direct marketing – there are no further criteria required in this instance).
- Request the restriction of processing: You can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or reason for processing.
- Request the data is transferred electronically (also known as the right to data portability): You can ask us to transfer your personal information to yourself or another data controller in a structured, commonly used, and machine readable format, where this is technically feasible.

- Right to withdraw consent: In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. If we require your consent to process any of your data, this will be made clear at the time we collect it.

Please note some of the above rights apply only in certain circumstances and/or are subject to conditions. For further information or to exercise any of these rights, please contact our Data Protection Officer.

You will not usually have to pay a fee to exercise these rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive (or refuse to comply with the request in such circumstances).

For security reasons we may need to request information from you to help us verify your entitlement to exercise any of your rights and/or to ensure that personal information is not disclosed to any person who has no right to receive it.

More information about where these rights apply can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

#### 11. Who can I speak to about my personal information held by EFL Trust?

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You can e-mail your questions to [DPO@efltrust.com](mailto:DPO@efltrust.com).

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

#### 12. Will this policy change?

We may update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.