

## **Privacy Statement – for those with parental responsibility for children under 13**

People, Potential, Possibilities (P3) is a registered charity and incorporates The Rugby Portobello Trust and Amber Trust. This Privacy Statement describes what information is collected when your child uses our childrens' services.

### **Introduction**

The new EU General Data Protection Regulation (GDPR) comes into force on 25 May 2018 (including the UK regardless of the process to leave the EU) and will impact every organisation which holds or processes personal data. It will introduce new responsibilities, including the requirement to demonstrate compliance and more stringent enforcement. It is an evolution in data protection not a revolution.

### **The categories of your child's information that we collect, hold and share include:**

- Personal information (such as name, date of birth and address)
- Characteristics (such as ethnicity, language, and nationality)
- Attendance information (such as sessions attended)
- Assessment information
- Relevant medical information
- Special Educational Needs information
- Exclusions / Behavioural information

We will also be collecting contact information for yourself and any emergency contact details to include email and phone number.

### **Why we collect and use this information**

We use your child's data:

- to support learning
- to monitor and report on progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

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

We collect and process data under the following legal basis for processing:

Article 6 (GDPR)

1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
2. processing is necessary for compliance with a legal obligation to which the controller is subject;

Article 9 (GDPR)

1. the data subject has given explicit consent to the processing of their personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

### **Collecting information**

Whilst the majority of your child's information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

### **Storing data**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

We will never share your personal information with other organisations for marketing, market research or commercial purposes.

### **Who we share information with**

We routinely share your child's information with:

- our Local Authority
- professional bodies relating to safeguarding children

### **Internal research and analysis:**

We carry out research and analysis on our clients and referrers, to determine the success of services and identify patterns and trends. This helps inform our approach towards services and make us a stronger and more effective organisation. Understanding those who use our services, their interests and what they care about also helps us provide a better experience.

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as to identify

trends or patterns within our client groups. This information helps inform our actions, assess demand and shape and improve services.

### **How long do we keep hold of your information?**

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. Your personal data, including support plans/risk assessments, is stored for up to fifteen years following the last contact P3 has with you.

### **What are your rights?**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to our Data Protection Officer at:

The Data Protection Officer  
Eagle House,  
Cotmanhay Road,  
Ilkeston,  
Derbyshire, DE78HU.

Should you wish to lodge a complaint with supervisory authority contact: The Information Commissioners Office on 0303 123 1113.