

# Privacy Notice (How we use your information)

## Holiday Activities and Food (HAF) Programme

### Schools Out!

The Holiday Activities and Food (HAF) Programme is a government scheme to deliver free healthy food and enriching activities for children and young people in reception to year 11 who are in receipt of benefits-related free school meals during the school holidays.

We rely on multiple Grant Access Point (GAP) registered voluntary, community and social enterprise ("VCSE") partners and OFSTED registered providers to help deliver this programme and we are required to feedback certain information to the Department of Education (DfE).

### The categories of information that we collect, process, hold and share include:

- Personal information
  - Name
  - Date of birth
  - Address
  - Free school meal eligibility (such as name, date of birth, address, free school meal eligibility and relevant health/medical information)
- Characteristics
  - Gender
  - Ethnicity
  - Disability
  - Special Education Needs
  - Relevant health and medical information

### Why we collect and hold this information

We use this personal data in order to:

- Enrol your child onto the activity.
- Identify and determine eligibility for the HAF.
- Keep children/families safe (for example, food allergies, additional needs, medication)
- Educate families/children on healthy eating and about health living.
- Provide your child with opportunities to develop new skills, try out new experiences and to have fun and socialise.
- Contact you with updates relating to the HAF.
- Ensure the safe delivery and co-ordination of the programme.

- Access funding so the sessions can be provided free of charge.
- Improve the quality of provisions across Kirklees.
- Ensure providers are supported to meet requirements.
- Comply with reporting requirements to DfE.
- Carry out feedback on the scheme.
- Derive statistics which inform decisions about future delivery of services.

## The lawful basis on which we use this information

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

### **6(1)(e) We need it to perform a public task.**

This information processing is considered to be part of Kirklees Councils public task. The processing and sharing of personal data in this way is required for the purpose of coordinating the HAF programme effectively, as outlined in the [Department for Education \(DfE\) HAF guidance](#)

These legal bases are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities. This includes, but may not be limited to:

- Children's Act 1989
- Section 17, Children Act, 2004
- Section 149 Equalities Act 2010
- Guidance from Working Together to Safeguard Children 2018
- Guidance from Every Child Matters, 2003
- Section 31 Grant Determination for the Holiday Activities and Food Programme Local Government Act 2003

Kirklees Council also has duties placed under the Local Government Act.

In order to do this work, we also need to collect some special category data. This is personal data that needs more protection because it is sensitive. Under Article 9 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing special category information are:

### **9(2)(g) Reasons of substantial public interest**

## How we store your personal information

Your information is safely stored on Kirklees Councils secure network servers with stringent access and use policies.

We keep personal information, characteristics for up to one year after the annual report has been returned. This is to fulfil the purposes we collected it for, including for the purposes of managing your HAF booking needs or DfE reporting requirements. We will then dispose of

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your information in accordance with the Council's main retention policy unless an exemption applies.

## Who we may share your information with

We may sometimes share the information we have collected about you where it is necessary, lawful and fair to do so. In each case we will only share the minimum amount of information, only when required, for the following reasons:

- To safeguard vulnerable children and young people;
- To help you to access other services or organisations that could help you;
- To develop local, regional and national policies;
- To manage local authority performance;
- To administer and allocate funding;
- To identify and encourage good practice.

We may share this information with:

- Other services within Kirklees Council;
- National government department e.g. Department for Education, who require proof of eligibility to fund the programme;
- Other VCSE partners who are administering and coordinating the programme on our behalf;
- Other partners such as health and the police.

We do not share personal information about you with anyone else without consent unless the law and our policies allow us to do so.

## Your data protection rights

Under data protection law, you have a number of rights, including the right to have your records rectified and the right to ask for access to all the information the Council holds about you. These rights are listed in more detail on [Kirklees Council's data protection rights page](#).

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.

Please contact us at [Data.protection@kirklees.gov.uk](mailto:Data.protection@kirklees.gov.uk) if you wish to make a request.

## Further information

If you would like further information about how we manage your data, please see the [Kirklees Council privacy notice](#).

If you would like further information about this privacy notice, please contact: [HAF@kirklees.gov.uk](mailto:HAF@kirklees.gov.uk)



If you have any worries or questions about how your personal data is handled, please contact the Data Protection Officer at [DPO@kirklees.gov.uk](mailto:DPO@kirklees.gov.uk) or by ringing 01484 221000.

You can also complain to the ICO if you are unhappy with how we have used your data. You can contact the ICO via the ['Contact us' page on their website](#), or by ringing 0303 123 1113.