

## **Privacy Notice (How we use your information)**

### **Triple P Positive Parenting Program**

### **Early Support Service**

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

- Personal information (such as name, email address and password)
- Your progress on the program.
- We ask everyone using this online program not to enter any sensitive personal data into the platform (i.e. in your responses to the programme). If you do decide to enter [special category personal data](#) into the platform, against our direction, you will be taken to have given your explicit consent to TPI storing that data, by your act of volunteering the information and entering it into your program response. For more information please see the PPP Online [Global Privacy Notice](#).
- As you work through the program, you will have the opportunity to record your observations and answers to questions. In doing so you will provide us with further personal data. This allows you to refer back to work through the program and go back to your previous answers and observations. Neither Kirklees staff nor Triple P will use that information.

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

We use this personal data in order to:

- Provide administrative support, including creating an online account for you to use the program and assisting you if you experience difficulties in accessing your account.
- Assess the quality of our services.
- Evaluate and improve our performance and the services we offer.
- Derive statistics which inform decisions about future delivery of services.

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

We collect and process information because we have legal obligations and a duty to support the education and safety of all young people. We also have some instances where the consent of young people or their parents / guardians is required.

We collect and use this information under:

Article 6: 1(a) –the data subject has given consent to the processing of his or her personal data for one of more specific purposes;

Article 6: 1(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

Article 9: 2 (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the

essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

The key areas of legislation that direct us to collect and use your information are as follows:

1. Children Act 1989 and 2004
2. Statutory Guidance under 'Working Together to Safeguard Children 2018'

Kirklees Council also has duties placed under the Local Government Act. Further detail can be found at the Local Government Act Extract 2 Promotion of well-being.

## **Storing this information**

We will hold the information about you securely, and for no longer than reasonably necessary. We also ensure that only members of staff with a legitimate reason to access your information have permission to do so. Your information will only be kept for a specific amount in order to comply with statutory requirements of time after which it will be securely destroyed. We will hold your information in line with our Retention Policies in order to ensure we only keep your information for as long as it is needed. In some instances, where multiple amounts of information are stored within our electronic records system, with different retention periods - we will need to keep all your information for the longest specified amount of time.

We note there are two Triple P online programmes; Triple P Online ("TPOL") which is suitable for parents of children aged 0-12, and Teen Triple P Online ("TTPOL") which is suitable for parents of children aged 10-16. As a result of how the programmes were developed over time the data for TPOL and TTPOL are stored in different locations. The data is encrypted in transit and in back-up. The TPOL data is held within the EU, in the Amazon data centre in the Republic of Ireland. The TTPOL data (only the registration data - i.e. name and email address) is currently stored in the United States, in the Amazon data centre which is located in North Virginia.

In transferring data to the United States, Triple P UK in the past relied on the EU-U.S. Privacy Shield Framework, which the European Commission had deemed adequate to enable data transfers under EU law. Amazon was a certified participant of the EU-U.S. Privacy Shield Framework ([www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4](http://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4)). Although it was voluntary for organisations to commit to comply with the requirements of the Privacy Shield Framework, once they had made the commitment, it was deemed legally enforceable.

The adequacy of the protection provided by the EU-US Privacy Shield was considered by the Court of Justice of the European Union ("CJEU"). The CJEU announced its judgment in late July 2020, which invalidated the EU-U.S. Privacy Shield as the basis for transferring data from the EU to the US.

Following the CJEU decision, the Triple P Group has been assured by Amazon ("AWS") that: "At AWS, our highest priority is securing our customers' data, and we implement rigorous technical and organizational measures to protect its confidentiality, integrity, and availability regardless of which AWS Region a customer has selected. Additionally, we have industry leading encryption services that give our customers a range of options to encrypt data in-transit and at rest. Since the Court of Justice of the European Union has validated the use of Standard Contractual Clauses (SCCs) as a mechanism for transferring data outside the European Union, our customers can continue to rely on the SCCs included in the AWS Data Processing Addendum if they choose to transfer their data outside the European Union in compliance with GDPR."

The AWS recently issued the GDPR Data Processing Addendum (“DPA”) which supplements the Customer Agreement we have with AWS. The DPA includes the Standard Contractual Clauses. We rely on this as the basis for transferring and storing limited personal data of TTPO users, to AWS infrastructure in the US.

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

We routinely share this information with:

- Other services within Kirklees Council: Social Care; Education; Housing, Disabled Children’s Service;
- Schools and other learning settings;
- Government Departments including Department for Education and Ministry of Health, Communities and Local Government;
- The Local Government Ombudsman who investigates complaints;
- Statutory agencies such as Ofsted, Police and Probations Services.

## **Why we share this information**

We share this information in order to achieve the best possible outcomes for children, young people and their families.

## **Further information**

If you would like further information about how we manage your data, please see the privacy notice for Kirklees Council at [www.kirklees.gov.uk/privacy](http://www.kirklees.gov.uk/privacy)

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