



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 coordinated in Sheffield, by Sheffield City Council (SCC).

SHH make free places at holiday clubs/activities available in the Easter, summer, and Christmas school holidays in 2023/2024. These will be made available to children who are in receipt of benefits-related free school meals.

There are 158 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 [privacydfe – sheffieldhealthyholidays.org](https://www.privacydfe-sheffieldhealthyholidays.org)

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 sub-processors. 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), behavioural 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 DfE and 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 public 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. Please contact your HAF provider.

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 are required to delete your information by the same date.

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

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

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

The majority of HAF providers use the iPAL booking system to record your child's activities.

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. The HAF providers use it for taking bookings directly for children or for management information.

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

A small number of providers use paper-based recording kept securely in their organisations.

Complaints

You have the right to submit a complaint if you are unhappy with the way your request is managed 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, 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 2

Meadowhead Academy

186th Sheffield Scout Group	Bare Project	Complete Education Solutions (iPal)	Flower Estate Family Action	Hybird Studios 3	Malin Bridge Primary School	Onboard Skatepark Sheffield LTD	Sharrow Primary School	SOAR	Tusaale United Football Club
A Mind Apart	Batemoor and Jordanthorpe Community Association	ComputerXplorers	Forge Youth	Ignite Imaginations	Manor After School Kids Klub	Owler Brook Primary School	Sheffield City Boxing Club	Southey Green Primary School & Nurseries	U Do It Dance Foundation
Active Education	Beighton Lifestyle Centre	Cryo Sports	Foxhill Forum	Imagination Gaming	Manor and Castle Development Trust	PACES School Sheffield	Sheffield City Council Youth Services	St Patrick's Catholic Voluntary Academy	Uis Community Gym
Active Fusion	Best Start Communities Count (MCDT)	Darnall Education and Sports Academy	FURD-Football Unites Racism Divides	Integrating and Inspiring Communities	Manor Training & Resource Centre	Pinder Dance Productions	Sheffield City Trust	Steamworks	United Learning Trust (Sheffield Park Academy)
ActivKidz	Boys & Girls Club South Yorkshire	Darnall FA	Galeed House	ISRAAC Somali Community Association	Meadowhead School	Pitsmoor Adventure Playground CIO	Sheffield Football Club	Steel City Sports	Unity Gym Project
Allama Iqbal Cricket Club	Brigantia Hinde House	Darnall Library	Grace Food Bank	Jane Collins Yoga	Montgomery Theatre	Places Leisure	Sheffield In2Change	Steel Evolution Mixed Martial Arts (RT Health)	Upper Wincobank Chapel
Amazelabs	Brigantia Yewlands (Brigantia Learning Trust)	Darnall Wellbeing	Green Estate Sharrow Community Forum	Jordanthorpe Library	Mr Dan Playtime Workshops	Premier Education	Sheffield Inclusion Centre	Stocksbridge Community Leisure Centre	Vision 313
An Even Better Arbourthorne	Buzz Sheffield	Debutots	Greentop Circus	Kids Love Yoga	Mums United	Qualitas	Sheffield Music School	Stubbin TARA	Voluntary Action Sheffield
Arbourthorne Community Primary School	Care for Young Peoples Future	Direct Action Training	Grow Theatre	Laces Boxing Club	Musical Works	Rainbow Forge Academy	Sheffield Roller Hockey Academy	Studio 54	Whiteways Primary School
Arbourthorne Pond	Caribbean Cricket Club	E-Act Pathways Academy	Hadfield Institute	Leisure United	Newfield Green Library	Reach Up Youth	Sheffield Sharks	The Emaan Trust	Windmill Lane Project
Arches School Sports Partnership	Cascade Multi Academy Trust Whiteways	Element Society	Heeley City Farm	Lindley Trust	Nexus Multi Academy Trust	RivelinCo	Sheffield United Community Foundation	The Heeley Institute	Women of South Yorkshire
Ashiana	Cascade Owlerbrook	Endeavour Training Ltd	Heeley Parish Church	Link Learning	Noodle Performance Arts	Roshni Sheffield Asian Women's Resource Centre	Sheffield Wednesday FC Community Programme	The House Skatepark	Yewlands Academy
Aspiring Communities Together	Chance to Dance	Everygreen Initiatives	Highfield Adventure Playground	Links School Sports Partnership	Oasis School Don Valley	Saalik Youth	Sheffield Women's Aid	The Meadows	Youth Sports Pathway
Astrea Academy	Chaucer School	Fir Vale Community Hub	Hinde House School	Longley Greens 4	Oasis School Fir Vale	Sams Space	ShipShape Health & Wellbeing	The Montgomery Theatre and Arts Centre	ZEST
Astrea Hartley Brook Primary (Astrea Multi Academy Trust Central)	ChilyPep	Fit Kids Forest Skills	Hope Community Foundation	Lowedges Community Library	Oasis School Watermead	Seven Hills SEND School	Site Gallery	The Terminus	Tusaale United Football Club
Ballers Sports Coaching	Community Wellness Service	Sports Works	Razzamatazz	Lowfield Primary School	On The Move	Sharrow Community Forum	Smart Peepz	Thornccliffe Leisure Centre	U Do It Dance Foundation