



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. These will be made available to children who are in receipt of benefits-related free school meals.

There are approximately 140 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 www.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.

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 for monitoring purposes

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 31st July 2026 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 Sheffield City Council 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.

Sheffield City Council on behalf of all HAF providers are the contact point for your child/you for you to exercise these rights. Contact: hafprogramme@sheffield.gov.uk

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 **SCC who are hosting IPAL** regarding your data. In these circumstances you can contact the SCC and request a review of the decision.

If you are not satisfied with the **SCC** 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.

