

Success4All's Privacy Notice (How we use your child's and your information)

Success4All respects your privacy and is committed to protecting you and your child's personal data. This privacy policy sets out how we look after your personal data, and tells you about your privacy rights and how the law protects you.

Data Controller – Success4All CIO

Charity Number: 1167004

Address: Carnegie Building, Atkinson Road, Newcastle Upon Tyne, NE4 8XS

Phone number: 0191 2732229

A data controller is an organisation that ultimately decides how to collect, use or process personal data. Success4All are the data controller of both you and your child's personal data.

If you have any questions about data protection, please contact us, by using the details below:

Busola Afolabi on busola@s4a.org.uk

We keep our privacy policy under regular review. This version was last updated on 11th August 2020. It is really important that we hold up-to-date information for you, therefore please let us know if this changes at any time.

Purpose and Legal Basis

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

- Personal information (such as name, unique beneficiary number, address, school name and phone number)
- Attendance of Success4All's service information (such as sessions attended and number of absences)
- Assessment information about the children and young people who use our services
- Information relevant to the welfare a child's needs e.g. Medical information, SEN information, behaviour.

Why we collect and use this information

We use this data to:

- support your child's learning
- assess the quality of our services and to safeguard children and young people

- comply with the law regarding safeguarding children and young people
- contact you with regards to our services
- report impact the of projects and services Success4All runs

The lawful basis on which we use this information

We collect and use children and young people's information where legislation (including the General Data Protection Regulation or 'GDPR') requires or allows us to do so (Article 6 GDPR) . We will only process personal data where we have one of 6 'lawful bases' to do so under data protection law:

- The data needs to be processed so that the charity can **fulfil a contract** with the individual, or the individual has asked the charity to take specific steps before entering into a contract
- The data needs to be processed so that the charity can **comply with a legal obligation** of safeguarding children and young people
- The data needs to be processed to ensure the **vital interests** of the individual
- The data needs to be processed so that the charity can perform a task **in the public interest**, and carry out its official functions
- The data needs to be processed for the **legitimate interests** of the charity or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a beneficiary) has freely given clear **Consent**

In the case of special category data within the meaning of GDPR, where this is (for example) necessary for reasons of substantial public interest (Article 9 GDPR). On the charity's registration forms these sections are marked as optional or are collected via additional forms and are anonymised.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Recipients

Your information will be shared, where appropriate, with internal staff, trustees and our volunteers, who work at and volunteer with Success4All. We also use Google Forms for our online registration forms. In this instance, your personal data will be processed by Google, who are based outside of the UK.

We will not share your personal data with anyone else outside of Success4All, unless:

- There is an issue that puts the safety of your child, you or someone else at risk
- We are legally required to do so
- We need to liaise with other agencies – we will seek consent (if required) before doing this
- You have given permission for us to do so. For example, a newspaper would like to write an article about Success4All and this would mean you or your child's information may be used. Before releasing information, we would seek prior written consent.

Funders

Success4All is a registered charity and receives donations and grants to run our services. On occasion funders require Success4All to report back on a project. On these occasions all information is anonymised, unless you have given prior consent for us to declare your identity.

Photographs and videos

As part of Success4All's activities, we may take photographs and record images of you and/or your child. We will always obtain written consent from parents/carers/guardians for photographs and videos, via our registration forms. These forms are re-signed each academic year.

Photos taken by Success4All are used for publication, communication, marketing and promotional materials. Uses may include:

- For our Newsletter and funding reports
- By external agencies such as newspapers or campaigns
- Online on our website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further. However, please note that where a photograph has already been printed in a newspaper, newsletter or similar (hard copy documents), we will not be able to remove this from those hard copies.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, for example, their name or the school they attend (without your express consent) to ensure they cannot be identified.

Countries

Success4All uses Google Forms for its registration forms. Google are based in the US, therefore any personal data you provide on these forms will also be processed by Google (see above in the 'Recipients' section). Google have appropriate safeguards in place to protect your personal data, and they comply with certain frameworks, to ensure this is the case. Google's privacy policy can be found here: <https://policies.google.com/privacy#infocollect>. If you have any questions, please let us know.

Any other information Success4All collects and stores on you and your child stays within the European Economic Area (EEA) and is never shared outside of the EEA, without prior written consent.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Retention

Success4All requires all service users to complete a registration form each year, to make sure the data we store, and process is correct and up to date. After 3 years all data we store on our cloud server is then anonymised. All paper documentation we store with personal details are shredded.

Rights of Individuals

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request restriction of processing of your personal data in certain scenarios
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.