

# Privacy Notice

## Cornwall Council and the National Lottery Community Fund



### Introduction

This privacy notice explains what personal data is collected by Cornwall Council and the National Lottery Community Fund on behalf of Head Start Programme, and how and why we use this data.

### Who are the Data Controllers for Head Start programme?

The joint data controllers are Cornwall Council and the National Lottery Community Fund.

### Who are we?

When you interact with us online, over the phone or face-to-face, the HeadStart Programme will collect your personal data and are responsible for how we store and use it.

### Your personal data – what is it?

Personal data is any information that relates to you and can be used to personal identify you. The personal data we (Cornwall Council) are sharing is your child's name, date of birth, gender, year group, Unique Pupil Number (UPN) and the name of the school they attend.

### How do we collect and use your personal data?

If your child participates in the HeadStart Wellbeing Measurement Framework (WMF) survey, we will collect and share personal data about your child.

The Fund's evaluators (currently University of Manchester and Anna Freud Centre) need up to date pupil lists including UPNs from Cornwall Council in order to generate a unique identifier for participants to log in and complete the WMF survey securely online. The Fund's evaluators also require the Unique Pupil Numbers (UPNs) in order to reduce matching errors when the data from the survey is analysed.

We will never use the information to identify specific pupils for any other reason.

We will keep your personal data up to date and store it securely. We will put appropriate technical measures in place to protect it from loss, misuse, unauthorised access and disclosure, and not collect or retain excessive amounts of personal data. When we have held your personal data for the maximum

period of time 4 years after your completion from the programme, we will destroy it securely.

## What is the purpose and legal basis for storing and using your personal data?

The National Lottery Community Fund is a public body with a statutory duty to distribute National Lottery and other funds for good causes. We process your personal data as a necessary part of exercising this official authority vested in us.

We will not collect and use personal data for purposes beyond our statutory duties except where we have your consent or notified you of about any change to processing your personal information.

Cornwall Council is required under the Children and Social Work Act 2017, to process your information where it is necessary for compliance with a legal obligation or to provide you with a requested service, support or information from Together for Families Directorate. When we process your data it is retained in accordance to the local authority retention criteria dependent on the level of intervention and services received.

The Council provides services in partnership with other agencies and providers on your behalf. Children and families, education and child health and wellbeing care workers in Cornwall often work together in teams providing support to people living in the community. Sometimes some of the information held needs to be shared with staff working in other Council departments and staff employed by the Police, Schools, NHS, other Health organisations and also other charities or organisations working on our behalf.

Together for Families services operate within a complex legal framework, supplemented by a significant body of statutory guidance. The primary legislation and guidance for the sharing of your personal data for the HeadStart programme is described in the Children Act 2004. More information about the primary legislation and guidance for the Directorate is available online: <https://www.cornwall.gov.uk/health-and-social-care/childrens-services/how-we-use-your-information-to-provide-services/>

## Sharing your personal data

We may share your personal data with Anna Freud Centre, and The University of Manchester. For example, we share personal data with organisations which help evaluate the impact of our grants on communities. In each case, we will only share personal data needed to carry out their work, and will do so subject

to appropriate safety measures that are designed to ensure your personal data remains secure and is only used for the intended purpose.

## How long do we keep your personal data?

We keep your personal data for no longer than is necessary, for 4 years which the term of the evaluation.

Cornwall Council will retain your data in accordance to the local authority retention criteria dependent on the level of intervention and services received.

## Your rights around your personal data

Your personal data is protected by legal rights. These include the right in certain circumstances to:

- request a copy of your personal data held by Cornwall Council and the National Lottery Community Fund;
- ask for your personal data to be erased, for example, if we no longer need it for the purpose we collected it;
- request that we suspend the processing of your personal data, for example if you want us to establish whether it is accurate or the reason for processing it;
- object to the processing of your personal data where we are processing it in the exercise of our official authority.

For more information or to exercise your data protection rights please contact our Data Protection Officer using the contact details below. There are other rights not listed here and exemptions may apply in some circumstances.

If you are unhappy about how your personal data has been used please refer to our complaints policy. You also have a right to complain to the Information Commissioner's Office – contact details below - which regulates the processing of personal data.

## Transfer of data abroad

Your personal data will not be transferred to a country outside of the European Economic Area. If however this changes, we will inform you.

## Automated decision making

Your personal data will not be subject to any automated decision making.

## Contact Details

If you would like to access any of the information we hold about you or if you have concerns regarding the way we have processed your information, please in the first instance contact the Data Protection Officers

Data Protection Officer

The National Lottery Community Fund

Apex House

3 Embassy Drive

Birmingham

B15 1TR.

E-mail: [GDPR.Requests@tnlcommunityfund.org.uk](mailto:GDPR.Requests@tnlcommunityfund.org.uk)

Data Protection Officer

Cornwall Council

County Hall

Truro

TR1 3AY

E-mail: [dpo@cornwall.gov.uk](mailto:dpo@cornwall.gov.uk)

Tel: 01872 326424

Our complaints team can be contacted via the following address:

Quality Assurance Business Manager

Together for Families

Cornwall Council

County Hall

Truro

TR1 3AY

E-mail: [csffeedback@cornwall.gov.uk](mailto:csffeedback@cornwall.gov.uk)

Tel: 01872 323164

We would prefer any complaints to be made to us initially so that we have the opportunity to see if we can put things right.

However, if you are unhappy with the way we have processed your information or how we have responded to your request to exercise any of your rights in relation to your data, you can raise your concerns direct with the Information Commissioner's Office. Tel: 0303 123 1113 or online: <https://ico.org.uk/> concerns or by post: the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.