



Building stronger families

Working to make lives better  
www.southend.gov.uk



## The Southend Family Network Long Privacy Notice

### About Us

The **Southend Family Network** is a group of organisations formed to manage the sharing of personal information collected within pre-school services in Southend-On-Sea.

For the purposes of the data processing described in this statement and compliance with the Data Protection Act (2018), the Southend Family Partnership operate as Joint Controllers of the data.

### The partnership comprises (Joint Controllers)

The Southend Family Network is a partnership of three organisations:	
Early Years Alliance (Trading as <b>A Better Start Southend</b> )	<b>Charity #1096526</b>
Family Action (Trading as <b>Southend Children's Centres</b> )	<b>Charity #264713</b>
Southend on Sea Borough Council	<b>N/A</b>

For the purpose of delivering the A Better Start Programme, we commission various organisations to work with you. These organisations will collect and process your personal information. Please see appendix 1 for the list of our data processors.

### Commitment

The Southend Family Partnership is committed to making sure that any information we hold about you will be collected, stored and used in accordance with The Data Protection Act 2018 and General Data Protection Regulation 2016/679 (GDPR).

This means that we adhere to the data protection principles of only holding information about you that is relevant to our work with you, that we make sure the information that we hold is accurate, up to date, secure, and only kept for as long as we need it.

To keep things simple, we have arranged a single point of contact through Family Action for all data protection issues.

### Our Data Protection Officer

Family Action will act on behalf of the Joint Controllers and Family Action's Data Protection Officer will be responsible for coordinating responses to any questions you may have in relation to this Privacy Policy.

If you have any questions about this Privacy Policy or Personal Information that we hold about you, including any requests to exercise your rights, please contact our designated Data Protection Officer using the details set out below:

<b>Data Protection Officer</b>	Chris Morecroft
<b>Address</b>	Family Action 24 Angel Gate, City Road London, EC1V2PT
<b>Email</b>	<a href="mailto:data.protection@family-action.org.uk">data.protection@family-action.org.uk</a>
<b>Telephone Number</b>	02072546251

## Where Do We Collect Your Information?

We will collect information about you at a number of stages during your use of our services. This will include when you interact with us directly and indirectly, through children's centres, community settings (a community setting is anywhere in the community that is open to the members of the public for example the ABSS Parents and Family Community Hub, Southend Hospital, Children Centres, etc.), in your home (if the service is delivered at your home), on the phone and online through Eventbrite (Eventbrite is an event booking platform we use to enable us to track who attends our events and where)

## Registration

When you register your child for one of our pre-school services, we will ask you to complete a Registration Form with details about you and your child. Where relevant, details of your partner may be requested but their consent will be sought before we use their personal information.

## During Your Child's Engagement with Us

Throughout your child's engagement with us, our service team will record information about the service provided to you, including case reporting, plans and reviews. This will help us to fully understand your needs and promote your health and wellbeing.

## What Personal Information Do We Record?

The type of information (including personal information) that we collect and use and what we do with it will depend upon your relationship with us and the service you receive.

We will collect only the personal information that we require to provide you with services that you have agreed to receive, meet our funders' requirements, assist research programmes and to keep in touch with you.

Example of information that we will collect and process	
Information about you:	Information about your child:
Name & Address	Name & Address
Contact Information (email / telephone)	Gender
Date of Birth	Date of Birth
Marital Status	*Disability Information
Employment Status	*Ethnic Origin
Benefits	*Language Spoken
*Disability Information	Services provided
*Health Information	Case history
*Ethnic Origin	Photographs (only where required and with consent)
*Language Spoken	

### \* Special Categories of Data

Due to the nature of the services we provide, some of the data we collect is sensitive.

For example, information relating to health, ethnicity and any particular additional requirements (such as disability and language spoken) you or your child may have. These are considered to be Special Categories of Data and we are required to take extra care when handling this information. We will seek your explicit (explicit = open and transparent) consent before using such information. Where you have consented to our processing of your data, you have the right to withdraw that consent at any time. Please note that if consent is withdrawn, it could affect the service/s you receive.

To withdraw consent or to discuss the matter, please contact [data.protection@family-action.org.uk](mailto:data.protection@family-action.org.uk) or write to us using the details below.

### How Do We Use Your Information?

We will only use your information in a fair and transparent manner and where we have a legal basis for doing so:

#### To provide the services you have agreed to receive

In order to provide the services that you/your child have registered for, we will need to communicate with you to arrange meetings and visits and discuss aspects of the service that you need. This will be via Letter, Email, Telephone, SMS or Website (for example Eventbrite).

We will also need to record details of the services that we have provided to you and your child and any further services that have been assessed and been identified for your child and you.

## Legal Basis for Using Your Information

Data protection legislation requires us to have a valid legal reason to process and use personal information about you. This is often called a 'legal basis'. GDPR requires us to be explicit with you about the legal basis upon which we rely in order to process your personal information.

Under Article 6 of the General Data Protection Regulations (GDPR), our lawful basis for processing and holding personal information is the Performance of a Contract (for example, the completion of a Registration Form).

Where we process your special categories data (please refer to list on page 3), we will only do so with your explicit consent (Article 9 of GDPR). If we have asked for your consent to process your personal information, you can find more information about the use of this on the consent form and on page 5 of this document.

Our services are often funded by other agencies, such as The National Lottery Community Fund or Local Authority. These agencies require us to provide reports about our services and the groups of people who have benefited from our services. These are then used to assess our performance and set targets for service improvements. To protect your privacy these reports will contain no personal information.

In certain, limited conditions (for example, safe guarding) we may use or disclose your personal information in order to comply with a legal obligation, in connection with a request from a public or government authority, in connection with court proceedings or to prevent loss of life or injury. Where possible and practical to do so, we will tell you in advance of such disclosure.

In order to analyse the effectiveness of our services and for research purposes, we intend to link information about children who benefit from these services with data on their outcomes at a later stage in their development (specifically educational outcomes at the end the early years foundation stage profile, key stage one and key stage two and information recorded in the National Child Measurement Programme at the end of reception and year six). In order to link service data with outcomes we will use a combination of name and date of birth. This will be carried out under the legal basis of tasks carried out in the public interest or in the exercise of official authority (Article 6 of GDPR).

However, any reported analysis will be combined at ward level and will therefore be anonymous (anonymous = non-personal information).

Where we also collect and use sensitive personal information (special category personal data) we only do so where, "the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; 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". (Article 9 of GDPR).

## How Long We Retain Your Information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements.

For the purpose of A Better Start Southend programme, we will retain your personal information for a period of seven years after the end of the programme in line with our funder's requirement. Where we keep the data for longer than the seven-year-period, this will be in line with the individual Controller's retention and disposal guidance. For more information about individual organisation's privacy notice visit any of the following sites:

**Early Years Alliance** - <https://www.eyalliance.org.uk/privacy-policy>

**Southend-on-Sea Borough Council** -

[https://www.southend.gov.uk/downloads/file/5542/privacy\\_notice\\_may\\_2018](https://www.southend.gov.uk/downloads/file/5542/privacy_notice_may_2018)

**Family Action** - <https://www.family-action.org.uk/services-privacy-notice/>

## Sharing & Disclosure

Your information will only be accessed by people who need to do so as part of their roles. This could include:

### Within the Partnership:

- Staff working at the service that you use;
- Senior managers, as required;

### Outside of the Partnership

- Relevant staff of our regulators (such as OFSTED or CQC), who may review our work in order to assess our performance and ensure we are keeping clear and accurate records;
- Relevant Staff working for our commissioners, on whose behalf we may be running the service you use. Commissioners will check files to make sure that we are providing you with the service that you should be receiving.
- ABSS Researchers – they will ask for your consent to collect and process your information.
- Research organisations including:
  - Warwick National Evaluation(In such cases, the individual organisation will independently seek your consent to process your personal information and will provide you with a Privacy Notice informing you of how they intend to use your personal information).

Where relevant we share your personal information with these trusted partners and suppliers who work with us or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your personal information.

## Rights

The GDPR legislation provides you with a number of rights in relation to your personal data.

### Right to Access

You have a right to obtain copies of the information that we hold about you.

- To request access to your personal information please email or write to us explaining what information you require. You may also request details on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. In the interest of security, you will need to prove your identity before any information can be shared with you.

Information must be provided without delay and at the latest within:

- one month of receipt for standard requests
- three months of receipt where requests are complex or numerous BUT ONLY if we inform the individual within one month of the receipt of the request and explain why the extension is necessary

The time limit only starts once all the necessary information for processing is received. This includes the time needed to verify a person's identity and/or to clarify their request.

Under the right of subject access, an individual is entitled only to their own personal data, and not to information relating to other people (unless they are acting on behalf of that person and have authority to do so. The right to obtain information should not adversely affect the rights and freedoms of others (third party data). To make sure this does not happen, where records contain information relating to more than one person, we will consider whether it is reasonable in all the circumstances to disclose the information about the third party. We will make decisions about disclosing third-party information on a case-by-case basis.

As we are obliged to provide information rather than documents; we may delete names or edit documents if the third-party information does not form part of the eligible information.

A record of withheld information will be maintained in a redaction log. Any redaction or withheld information will be recorded and a redaction log maintained. This redaction log should be sent to the requester along with the response (unless to do so would be inappropriate). This log will also enable us to explain and review decisions if challenged by the requester or the ICO.

In addition to third party data, in certain circumstances other data may not be provided to the requester. This includes information which might prejudice the:

- Prevention and detection of crime
- The prosecution or apprehension of offenders
- The assessment or collection of a tax or duty

- Information which is required to be made public under other legislation (except the Freedom of Information Act)
- Certain management forecasting or planning information
- Information protected by Legal Professional Privilege (legal advice privilege and litigation privilege)
- Information relating to negotiations with the requester (such as pay rises, contracts, employee relations discussions, investigations)
- Information which might prejudice the future carrying out of social work

If we cannot process your request for any reason, you will be provided with an explanation for the refusal.

## • **Right to Rectification**

We would like to ensure that the data we hold about you is accurate and up-to-date. If you believe the data we hold is inaccurate or incomplete, please contact us and we will check our records, and, if appropriate, will make any necessary amendments.

## • **Right to Erasure (Right to be Forgotten)**

In certain circumstances, you can ask us to remove your data from our system. You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. If however there is a legal reason for us to continue holding the data we will let you know, otherwise we will make effort to comply with your request.

There are some specific circumstances where the right to erasure **does not apply** and we can refuse to deal with a request.

While we are considering a request, we may need to restrict the use of the data in question (see the right to restrict processing below).

We can refuse to comply with a request for erasure where the personal data is processed for the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation for the performance of a public interest task or exercise of official authority.
- for public health purposes in the public interest;
- archiving purposes in the public interest, scientific research historical research or statistical purposes; or
- the exercise or defence of legal claims.

## • **Restriction of Processing**

We are required to restrict the processing of personal data in the following circumstances:

- Where we are considering a request for data rectification or for erasure (see above) or an objection to processing (see below).
- When processing is unlawful and the individual opposes erasure and requests restriction instead (they don't want their data to be completely erased)

- Where we no longer need the personal data but the individual requires it to establish, exercise or defend a legal claim

If we have disclosed the personal data in question to third parties, we will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

We will also inform individuals when we decide to lift a restriction on processing

## • Right to Object

Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

### **Personal data processed for the performance of a legal task or our legitimate interests**

Individuals are required to base their objection on “grounds relating to his or her particular situation”.

We will stop processing the personal data unless:

- We can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- The processing is for the establishment, exercise or defence of legal claims

Additionally we will also inform individuals of their right to object “at the point of first communication” and in our privacy notice.

## • The Right to Data Portability

- Being provided with an electronic copy of certain records to use for a different purpose
- Rights in relation to **automated decision making and profiling** – to have human intervention reconsider automated decisions and profiling

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request. If you have any questions please contact us.

## Keeping Your Information Secure

We take various steps to keep your information safe:

- we take appropriate care to secure the information we hold about you
- our technical security is robust and includes passwords and information encryption
- we have policies and procedures to make sure your information is only available to those who need to see it to do their jobs
- our staff are appropriately trained and understand their personal responsibilities regarding the security of your information
- We have robust procedures and contracts to extend these protections to any other person or organisation we may need to give or share your information with.

## Where We Store Your Information

All personal information will be processed and stored securely using systems based in the UK. In order to comply with legal requirements, your information will be retained for seven years after the end of the contract, after which time it will be securely destroyed in line with our internal retention policies.

## Marketing, events and services

We may offer you opportunities to hear about events and services provided by the organisation and our partners. When we do we will ask for your consent to do so and we will offer you a clear opportunity to opt out at any time.

## Cookies

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, cannot be used to identify you.

## How Do We Use Cookies

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

You can opt out of all our cookies (except the strictly necessary ones). Find out how to control and delete cookies in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

## How do I change my cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

## To Contact Us

If you have a question on your rights, or have a question about anything on this privacy notice, or are concerned about the way we have processed your personal information, please contact us via [data.protection@family-action.org.uk](mailto:data.protection@family-action.org.uk).

Also, if you have a complaint, please contact us in the first instance via [data.protection@family-action.org.uk](mailto:data.protection@family-action.org.uk) or by using the following phone number 02072546251, and if we are unable to resolve the matter, you have the right to complain to the Information Commissioners Officer (ICO). To do so, please visit the ICO website <http://ico.org.uk>

## Changes

The partnership reserves the right to make changes to this privacy policy from time to time. Where we do so, we will publish the new policy on the ABSS website

[www.abetterstartsouthend.co.uk/families](http://www.abetterstartsouthend.co.uk/families) and where appropriate, we will notify you by email and in person when you visit any of the children centres.

## Contact

Should you wish to contact us, our registered address is:

Family Action  
24 Angel Gate,  
City Road  
London, EC1V2PT

## Appendix 1: Our Processors

Below is the list of A Better Start Southend Processors under the joint control agreement. We will continue to update this list as we commission additional services.

Organisation/ project	Where they provide their services	Active
<b>Essex Partnership University NHS TRUST – EPUT</b>  <b>Project:</b> Family Nurse Partnership	Home - <b>main</b> Children Centres Library Other community settings	Yes
<b>Essex Partnership University NHS TRUST – EPUT</b>  <b>Project:</b> Let's Talk <ul style="list-style-type: none"> <li>• Talking Walk- Ins</li> <li>• 23 Month Screening</li> <li>• Chatting Children</li> <li>• Super Sounds</li> <li>• Little Listeners</li> <li>• Attention ABS</li> <li>• Talking Tiddlers</li> <li>• Project Home and Early Years Setting</li> <li>• Follow Up Sessions</li> <li>• Talking Toddlers</li> <li>• Let's Talk with your Baby</li> </ul>	Children Centres – <b>main</b> Home Early Years Settings Other community settings – future	Yes
<b>Southend Association for Voluntary Services (SAVS)</b>  <b>Project:</b> Engagement Service	Community settings – <b>main</b> SAVS Children Centres	Yes
<b>Southend YMCA</b>  <b>Project:</b> Breastfeeding Group Support	Children Centres Other community settings	Yes
<b>Early Years Alliance</b>	Early Years Settings - <b>main</b> Tickfield Centre	Yes

<b>Projects:</b> *Communication Champions and Early Years Workforce Training *WellComm Screening for children 6 months – 3years 11 months.	SAVS Childminders	
<b>Southend-on-Sea Borough Council</b> (Health Visiting Service)  <b>Project:</b> 3-4 months Checks	Home	Yes
<b>Essex Partnership University NHS TRUST – EPUT</b>  <b>Project:</b> Perinatal Mental Health	Home – <b>main</b> Children Centres	Yes
<b>Southend University Teaching Hospital (SUFTH)</b>  <b>Project:</b> 121 Breastfeeding support	Home – <b>main</b> Southend Hospital	Yes
<b>Southend-on-Sea Borough Council</b>  <b>Project:</b> ABSS Workskills	Children Centres – <b>main</b> Balmoral Centre Business premises Other community settings.	Yes
<b>Southend-on-Sea Borough Council</b>  <b>Project:</b> SEAS	Home – <b>main</b> Children Centres	Yes
<b>HENRY</b>  <b>Project:</b> HENRY Healthy Families	Children Centres - <b>main</b> Other community settings	Yes
<b>South London Maudsley and NHS Foundation Trust (SLAM)</b>  <b>Project:</b> Empowering Parents Empowering Community (EPEC) *Baby and Us *Being a Parent	Children Centres	Yes
<b>Early Years Alliance – East Anglian Hub in partnership with Southend-on-Sea Borough Council</b>  <b>Project:</b> Family Support Workers for Speech and Language Communication Needs (FSW SLCN)	Home - <b>main</b> Children Centres	Yes
<b>Public Health and Southend Clinical Commissioning Group</b>	GP Surgeries - <b>main</b>	Yes

<b>Project:</b> Joint Paediatric Clinic		
<b>Family Action</b>	Children Centres	Yes
<b>Project:</b> Programme Delivery Service: <ul style="list-style-type: none"> <li>• Food 4 Life</li> <li>• Healthy Cooking for Families</li> <li>• Introducing Solids Workshops</li> <li>• EPEC Administration</li> </ul>		
<b>Southend-on-Sea Borough Council</b>	Community settings Children Centres	Yes
<b>Project:</b> Integrated Children's Centres		
Welcome 2 UK	Children Centres Community Settings	Yes
<b>Project:</b> The provision of crèche service		
<b>Future Projects</b>		
Unknown yet	Tbc	No
<b>Project:</b> Family Support Service (Your Family Service – under review)		
Unknown yet	Tbc	No
<b>Project:</b> Preparation for Parenthood		
Unknown yet	Tbc	No
<b>Project:</b> Maternal Healthy Weight		
<b>Inactive Projects</b>		
<b>Fatherhood Institute</b> (Consultancy)	N/A	No longer active
<b>Project:</b> Father Inclusive Practice		
<b>Fatherhood Institute</b>	Children Centres - <b>main</b> Family Storehouse Day Nursery Settings Barons Court Nursery Other community settings	No longer delivering
<b>Project:</b> Fathers Reading Every Day		