



Holiday Activities and Food Programme Privacy Notice

Last updated: July 2023

This privacy notice (“**notice**”) explains how we, Edesco Ltd, trading as The Education People (“**we**”, “**us**”, “**our**”) and part of the Commercial Services Group, handle your personal data if you take part in, or help support, our Holiday Activities and Food Programme (“**HAF**”).

If you don’t understand anything in this notice or want to ask any question about your data protection rights, please contact us by email at dpo@csltd.org.uk.

Please also read our [website privacy notice](#) which covers your use of our website and interactions with us outside of the HAF Programme.

1. What is the HAF Programme?

We provide a range of early years learning services to children and families in the Kent area. HAF entitles the families of children aged 4 to 16 years who are in receipt of benefits related to free school meals to access free activities during school holidays using HAF Evoucher's issued through a child's school. Entitled families can use their HAF Evoucher's to sign up to activities provided by our programme partners (“**HAF Programmes**” and “**Programme Partners**”) on the Evoucher Platform. Social workers and early help workers can also refer children and young people to the HAF Programme if they feel it would be beneficial. The programme is funded by the Department of Education (“**DfE**”), however families can apply for non-funded and alternative-funded places on HAF Programmes.

We encourage you to read the [Evoucher Platform privacy notice](#), which explains how the operator of the Evoucher Platform uses your personal data.

2. Who does this privacy notice apply to?

This notice applies to you and your family if you sign up to any HAF Programmes. It also applies to you if you work for one of our Programme Partners, and if you correspond with us in any way in relation to the HAF Programme.

3. What types of personal data do we process?

“**Personal data**” means any information that identifies you or relates to you.

We will process the following personal data about you:

- **General information** including your and your families names, dates of birth, gender, marital status, address, telephone number and email address, and similar information.
- **Benefits information** including information of any benefits-related to free school meals that you are entitled to receive.
- **Information about your use of our services**, such as details of the HAF Programmes you sign up to and your attendance at these programmes.
- **Special categories** of personal data including if you or your child has special education needs and disabilities (SEND) or additional needs, and any food allergies you or any of your family has. However, we will only use this information where there is a specific need to do so, for example in the event of a complaint or a safeguarding issue.
- **Business information** if you work for a Programme Partner or otherwise support us in providing the HAF Programme, including your professional contact details and other information we obtain when corresponding with you in relation to the

We have access to the Evoucher Platform which contains your and your family's personal data. However, access controls have been put in place to ensure that only those staff members with a genuine and legitimate need to view or access your or your family's special categories of personal data can do so, including if you or your child has special educational needs and disabilities (SEND) or additional needs, and any medical conditions including food allergies that you or any of your family has.

We ask for personal data that is necessary for our purposes in providing the HAF Programme. However, please let us know if you feel that we request too much.

We will rely on the information provided by you as being accurate, complete and up to date. We ask that you let us know of any changes.

4. How is your personal data collected?

We may get your personal data from:

- **You**, when you when you correspond with us about HAF Programmes.
- **The Evoucher Platform** when you sign up to HAF Programmes and provide your details.
- **Third parties** such as your child's school, if they provide information relating to your HAF Evoucher, the Programme Partner providing the HAF Programme you attend, your social worker or early help worker, another organisation who introduces you to us with your permission, which might be your local council, children's centre, charity, school, your employer if you work for a Programme Partner, or other third parties.

If you provide information to us about your partner, children or others, please ensure they are happy for you to do so.

5. Why do we process your personal data?

This section explains what personal data is needed for each purpose. Please contact us if you have any questions.

Purpose	Personal data	Lawful basis of processing
To respond to your enquiries you make in relation to the HAF Programme.	General information Benefits information	Necessary in order to take steps prior to entering into a contract with you
To enable you to participate in HAF Programmes that you request and to deal with any complaints that may arise	General information Benefits information Special categories of personal data	Necessary for our legitimate interests in providing the HAF Programme Where we process special categories of personal data to deal with any complaints, we do so on the basis of substantial public interest in safeguarding children and individuals at risk.
To correspond with you in relation to the business support you give us in connection with the HAF Programme.	Business information	Necessary for the performance of our contract with you
To share information with Kent County Council and DfE in order to comply with our funding obligations as a HAF provider, and to ensure the ongoing success of the HAF Programme.	Such aggregated and anonymised or pseudonymised personal data as is lawful, necessary and proportionate	Necessary for our legitimate interest to comply with our funding obligations as a recipient of a HAF grant
To process and share information as is required for our compliance with the law or to establish, exercise or defend legal claims .	Such personal data as is lawful, necessary and proportionate including	Where processing or sharing your data is necessary to satisfy our legitimate interest in complying with best practice or applicable laws, for compliance with our legal obligation , to establish, exercise

Purpose	Personal data	Lawful basis of processing
To share information with third parties where required by law in order to escalate a safeguarding issue .	special categories of personal data	or defend legal claims , or in the substantial public interest in safeguarding children and individuals at risk.

6. Who do we share your personal data with?

Within our organisation, we only allow access to your personal data by people who have a “need to know”.

We may share your personal data with the following third parties:

- The Programme Partner providing you with the HAF Programme you have signed up for.
- Kent County Council, which commissions us to provide the HAF Programme.
- The Department for Education which grants us funding to provide the HAF Programme.
- Our affiliated entities who help us to provide the service or with business administration
- Our service providers who provide communications, IT and other business tools and services
- Public authorities where required by law or best practice
- Our legal advisors and other professionals, for example, where necessary in connection with a dispute
- Another organisation in case of a sale or acquisition of our business

You should check the privacy statements of these third parties and we are not responsible for how they may process your personal data.

7. How do we keep your personal data?

We are committed to keeping all the information we hold about you secure, private and confidential.

We have procedures and security controls in place to keep your data secure once we receive it. We also make efforts to ensure our third-party service providers do the same.

8. How long is your data kept?

We only keep your data for as long as we need to in order to use it as described above in section 5, including for the purposes of providing the HAF Programme you have signed up for and/or for satisfying any legal, regulatory, tax, accounting or reporting requirements.

9. **Where we store your personal data**

Generally, your personal data will be held in the UK. If your data needs to be transferred outside of the UK, for example to a services provider in the EU, we will make sure that your data protection rights are protected.

You can request further information on the safeguards we have in place to protect your data when it is transferred.

10. **Your rights**

Unless a certain exception applies, you have the following rights in connection with your personal data:

- **Right to information** about matters set out in this notice. You may also contact us for further details about our data retention policy, international data transfers and other matters that are unclear.
- **Right to make an access request** to receive a copy of your personal data held by us.
- **Right to rectification** of any inaccurate or incomplete personal data.
- **Right to withdraw consent** if you have previously consented to something.
- **Right to object to our processing** of personal data based on our legitimate interests.
- **Right to erasure** of personal data that is no longer needed.
- **Restriction on the processing** of personal data.
- **Right to human intervention** in respect of any automated decision-making without human involvement that significantly affected you.
- **Right to data portability** from one service provider to another, where applicable.
- **Right to make a complaint** to the Information Commissioner's Office if you believe there is a problem with how we have handled your data.

All requests will be handled in a timely manner and no later than within one month. If we cannot handle your request within this period, we will explain why and process it as soon as possible thereafter.

11. **Updates to this notice**

We may update this notice from time to time and will inform you of any new purpose of processing. If any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.