



## Privacy notice – with schools

### **Who we are:**

Play Midlothian is a Scottish Registered Charity (no. SC025474) and a Company Limited by Guarantee (no. SC240729). Our registered office address is Gorebridge Beacon, Hunterfield Road, Gorebridge, EH23 4TT. If you would like to find out more please contact us on 01875 820 889 or visit [www.playmidlothian.org.uk](http://www.playmidlothian.org.uk).

### **Introduction:**

We are committed to ensuring that any personal data we hold about you is protected in accordance with data protection laws and is used in line with your expectations.

This privacy notice relates to services we provide to schools, to support children's wellbeing, development and attainment. It explains why we collect your personal data, how we use it and how we protect it.

### **Why we collect personal data from you:**

We collect personal data about your child (and if need be you) to provide support that is tailored to your child's individual needs.

As our contact with your child is arranged via a school and takes place within the school, in most instances we will not need family contact details. However, there may be times our initial link with the school came via your child being referred to the Midlothian Children and Young People's Wellbeing Consortium to plan appropriate support, and in those cases we have access to the full referral form. (This would have only happened with your knowledge at that time.)

Personal details that we collect about your child are most often your child's name and age or date of birth. In order to tailor our support to your child's needs, we will also collect information about areas for development we can support, as the school judges necessary. This may include health and medical needs and any special educational needs.

We need to collect the above personal data from you because of our legitimate interests in providing a service for the school which supports your child's wellbeing and/or development and/or attainment.

Ordinarily information about how your child is doing at our sessions will be shared by the school rather than ourselves – the school will remain your point of contact. However, where we do have your contact information through a referral, there may be rare circumstances under which we establish contact, in discussion with the school.

We also carry out evaluation of our service, to meet our legitimate interests and activities. We need to collect information about whether or not our service is having a positive impact on children, so that we can provide tailored support and improve our services.

This would include information you and your child provide about the service and what it is achieving (or not achieving) for you. This could be collected using, for example, questionnaires or evaluation star charts. We

also record our observations of changes we have seen in the children. At times this may include information about health or other support needs.

We also need to provide evidence to our funders that our services are achieving benefits for children, families, schools and communities – without this evidence it would be very difficult to fund and provide services. The data we share in our reports to funders is anonymised or names are changed. It is possible, though very unlikely, a funder may include in their terms and conditions the right to check our service records, to verify we have used their funding correctly.

We also share evaluation information that is anonymised, or with changed names – such as quotes, statistics or case studies – in our marketing materials, to highlight the work of Play Midlothian.

With your consent, we will also take photographs or videos of you and/or your child. (Though consent is not required for general group scenes, or where people would be difficult to identify.) Images could be used for evaluation and promotional purposes, including potentially on television, in newspapers or magazines, online (including on social media), in reports and in printed marketing materials.

We will only add you to our general mailing list to find out about other Play Midlothian services and news with your consent.

We have a legal obligation to process safeguarding related data about your child, should we have concerns about their welfare.

### **Who we share your data with:**

We will share information about how your child is doing at our sessions with the school.

We may share your data with others providing Play Midlothian with business services, for example the following categories:

- IT service providers
- Communications service providers (so that we can send you information)
- Banking services (to process payments)
- Freelancers (for example assisting with our services)
- Advisers (for example supporting us to establish new systems)
- Our insurer (if applicable)

This would only be for the purposes of Play Midlothian business.

We may need to share data relating to you and your child with medical professionals, in the event of an accident or incident.

We will also share your data:

- If we are legally required to do so, for example, by law, by a court, by the Office of the Scottish Charity Regulator or by Companies House
- To protect children, for example by sharing information with social work or the police
- If it is necessary to protect our or others' rights, property or safety
- If we transfer the management of Play Midlothian

At times, this may include transfer of your data outside of the UK (for example, for use of an IT service), when this complies with the relevant provisions under data protection regulations.

We will never share your personal data with any other organisation to use for their own purposes – with the exception of the school for which we are providing the support service, which will need to understand your child’s progress.

With your consent, we may share your data to make a referral to another organisation or agency, so that you can access their services.

Although consent for further processing of images can be withdrawn, images already used in print or other publicly available material, or which have spread online, will remain in the public realm.

### **How we keep your personal data:**

We maintain appropriate technical and organisational measures to ensure the security of people’s data.

We will keep most of your details for five years after you cease attending, unless you consent to us keeping that data for longer. Variations to this are:

- Medication records and accident records, which are kept for longer according to legal requirements
- Photos that have already been used in printed marketing materials or that have been shared online – which by that point have become historic, public record
- Complaints, which are kept on file for two years from the conclusion of the complaint
- Child or vulnerable adult protection (safeguarding data), or other support service referrals, in which cases we may be obliged to keep your data for longer to comply with legal requirements

### **Your rights with respect to your data:**

You have the right to request:

- Access to your personal data
- To have inaccurate personal data rectified, or completed if it is incomplete
- To restrict our processing of your data (in certain circumstances and never safeguarding data)
- Erasure of your data (but never safeguarding data)
- Portability of your data, so that this can be transferred to another service (but never safeguarding or evaluation data)

You also have the right to object to our processing of your data, outlining the reasons why you are objecting. In those cases, we would weigh up whether our legitimate grounds for processing the data override the objection, or vice versa.

If you wish to exercise any of these rights at any time, or if you have any questions, comments or concerns about this privacy notice, or how we handle your data, please contact us.

If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner’s Office (ICO). The ICO can be contacted at Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or via [www.ico.org.uk](http://www.ico.org.uk)

### **Changes to this notice:**

We keep this notice under regular review and may update it.