

CHILD PRIVACY NOTICE

1. What is the purpose of this document?

EFL Trust collect some information about you when you take part in our projects. We are committed to keeping your information safe. This privacy notice describes what EFL Trust will do with the information we collect about you, and what your rights are.

This notice applies to; participants and peer mentors, on our On Side programme.

2. Why do we want to obtain data?

You have been selected to participate in the 'On Side' programme commissioned by EFL Trust and funded by The Home Office. They provide funding to deliver a programme that aims to reduce violence against women & girls and anti-social behaviour, by connecting with the community to raise awareness, educate and change behaviours. We would like your data to explore whether the On Side programme is meeting these targets. This allows us to continue to increase awareness of the importance of reducing violence against women & girls and anti-social behaviours, or make changes to the programme, if we are not meeting our targets.

3. Where do we obtain personal data from?

The information we process about you is retrieved from:

- The Community Club Organisation (CCO) that deliver the programme
- You

You will be provided with a questionnaire and depending on your role within the programme, they will be provided in the following ways:

- Participant Surveys (to be collected before and after the programme)
- Participant Reflective Survey (to be collected only after the programme)

For those which are before and after, we compare before programme answers with after programme answers. The questionnaires are handed out by the Community Club Organisation (CCO) who deliver the programme to you. For the before and after questionnaires which require matching, the questionnaires will use a code rather than having your name on (e.g. A-001). This way, the CCO can match up your questionnaires together without being able to tell it is yours. The code that matches your name will be

deleted once the programme finishes, so after this we can never tell which answers were yours.

As part of the funding requirements, Kantar Public (an independent research organisation) have been asked by the Home Office to conduct an evaluation of this and other similar programmes, and are conducting a separate survey evaluation. These surveys will not contain names, and responses will be confidential and anonymous. You can view Kantar Public's Privacy policy [here](#). We have provided a specific tickbox on the consent form for you to consent to your involvement in Kantar Public's survey.

4. What kind of information do we hold about you, and why?

Personal data, or personal information, means any information about an individual from which we can work out who a person is. It does not include data where an individual cannot be identified. The following groups categories of personal data are required to register you onto the programme, and also to show that we are meeting funder requirements in providing support to peer mentors, volunteers and participants:

Social Action Volunteers / Peer Mentors -

- Name
- Date of Birth
- Age
- Gender

Other Participants -

- Gender
- Age

There are "special categories" of more sensitive personal data which require a higher level of protection. We will process the following categories of personal information about you:

Social Action Volunteers / Peer Mentors -

- Ethnicity
- Health/Disability
- History of offending

Other Participants -

- Ethnicity
- Health/Disability

- The questionnaire will ask a range of questions, some of which include special category data. The questions fall into the following categories:
 - Self-reported wellbeing
- Once the programme is completed and questionnaires are matched up, we will remove the codes we used to show who it belonged to, for most of the limited people who have access to it and will no longer be personal data as you cannot be recognised from it. The secure database which is used to store the data requires a small number of staff who would be able to link your name to the responses. These

staff have signed that they agree to more rules to make sure that they will not share the information they have access to with anyone else. EFL Trust will not share individual answers with anybody, instead all information will be grouped together.

5. What does the law say about us being allowed to use this information?

We will only collect and use your information when the law allows us to. We are allowed to do this where we meet the following conditions:

1. Where you or your parents have given consent for us to do so (and we've told you and your parents what we're going to do with the information).
2. Where we need to do so as it is in our interests or your interests, and your interests and rights have not been negatively impacted by our actions.

Our interests are:

- Registering an individual on the programme
- Assessing the different people involved in the programme

Special category data:

In order to process special categories of information about you, we are also required to have another condition. The condition we use is:

1. Where you or your parents have given consent for us to do so (and we've told you and your parents what we're going to do with the information).

We have provided a consent form for your parent/guardian to consent to your information being processed. If you do not provide your consent, you will still be able to take part in the programme.

We will only use your personal information 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 similar with the original reason.

6. What is 'automated decision-making' and does EFL Trust use it?

Automated decision-making means that an electronic system uses your information to make a decision about you, without a human being involved in the decision. We will not do this with your information.

7. Is my personal information shared with other organisations?

EFL Trust will only share information with other organisations for their own use where the information does not identify anybody. Once we have analysed information we will only share combined information. For example, we might say 'xx% of participants improved their attitude to physical activity'.

There are some organisations that we pay to carry out a service for us. We might share your information with those organisations, but only where they are following our direct instructions in what they do with the information. Where we have a contract with those organisations so that we are clear about what they can and can't do with the information, so that we can keep it safe.

In exceptional situations, we might have to share information with an organisation to obey the law (for example, a court).

8. Is my personal information kept safe?

We have put in place methods to protect your information, and will review this regularly. We have security measures that help us to stop your information from being accidentally lost, and to stop people seeing your information if they have a need to do so.

Other organisations will only be given access to your information where they have agreed to treat the information confidentially and to keep it safe.

If we think your information has been lost or stolen, we have a process to deal with this, as the law requires us to.

9. How long will you keep my information for?

We will only keep your information for as long as we need to, as we've described earlier in this document.

We will keep your information in a way that you can be identified from it for up to 3 years from the end of the programme. Once the programme finishes then we'll make sure that the information is anonymous (nobody can tell who it belongs to), apart from to a small number of staff who are required to access for administration reasons. These staff have signed that they agree to additional requirements to make sure that they will not share the information they have access to with anyone else.

10. What are my rights in connection with my information?

You have the following rights:

- To be informed: We have to tell you what we are going to do with your information. This document is designed to ensure you know what we are going to do with your information.
- Access: Your parents can ask for a copy of the information we hold about you.
- Correction: This enables you to tell us if information we have about you is wrong.
- Right to be forgotten: This enables you to ask us to delete or remove personal information where there is no good reason for us to hold it.
- Object: this applies where we are relying on a legitimate interest and you want to object to us processing.

- Restriction: You can ask us to suspend using your information for a short period, for example if you want us to establish that it is correct.
- Request the data is transferred electronically (also known as the right to data portability): You can ask us to transfer your information to yourself or another organisation.
- Right to withdraw consent: You can choose to withdraw consent for us to use your information.

Please note some of the above rights apply only in certain situations. For further information or to exercise any of these rights, please contact our Data Protection Officer.

You will not usually have to pay us to exercise these rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive (or refuse to comply with the request in such circumstances).

11. Who can I speak to about my personal information held by EFL Trust?

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You can e-mail your questions to DPO@efltrust.com.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

12. Will this policy change?

We may update this privacy notice at any time, and we will provide you with a new privacy notice when we make any significant updates.