



## Privacy Notice for BB4K Services

Bounce Back 4 Kids (BB4K) is one of the Parents and Children Together (PACT) community projects. We gather information as part of this service. We act as a data controller, deciding how your personal data is processed and for what purposes.

### Personal Data PACT collects:

Personal data is any information that can be used to identify you. We collect personal data on your child(ren), you, and any professionals who provide you with support, such as social workers.

Typically, we will collect

- **Contact information** (e.g., phone number, mobile number, home address, and email address).
- **Profile information** (e.g., your name, gender, date of birth, preferred pronouns, occupation, and primary language).
- **Referral information** (i.e., behavioural information)
- **Technical information** (e.g., login credentials for BOUNCE)

Data Protection Law recognises that some categories of personal information are more sensitive than others, for example, information about your health, race, ethnic origin, political opinions, sexual orientation, religious beliefs or whether you have committed a criminal offence. Typically, we will collect:

- Ethnic origin
- Health information, including if the child is on a safeguarding plan, learning needs, disabilities, current medications, and/or dietary requirements.

This privacy policy provides information on what we process, why we process, and how we will use it.

## What does PACT do with your Personal Data?

The data we gather is held in accordance with Data Protection Law, including the UK and EU General Data Protection Regulation (the 'GDPR') and the Privacy and Electronic Communications (EC Directive) 2003. PACT complies with its obligations under GDPR by:

- keeping personal data up to date.
- Storing and destroying it securely.
- Not collecting or retaining excessive data
- protects personal data from loss, misuse, unauthorised access, and disclosure.
- Ensuring that appropriate technical measures are in place to protect personal data.

## Why do we need Your Personal Data?

1. To inform the assessment process.
2. To ensure we offer you an appropriate package of support.
3. To keep you informed of services and events that might be of assistance or interest to you.
4. To assess how successful we have been in helping you and report this to the organisations that are funding our work.
5. To record how we worked with you.
6. To provide you access to the BOUNCE platform.

Suppose PACT uses CCTV to keep service users and staff safe. In that case, we comply with the Information Commissioner's Office CCTV Code of Practice.

## The source of data we record about you:

The data we record about you may come from yourself, Police, Social Services, and any other professional working with you, such as third-party agencies.

The data we record about you may be provided electronically, in the online referral form, or gathered from our contact with you.

## The Legal Basis for Processing Your Data:

PACT processes data in line with Article 6 of the General Data Protection Regulations:

- With the consent of the data subject.
- Where the processing is necessary for the performance of a contract with the data subject or to take steps to enter a contract.

- Where the processing is necessary to protect the vital interests of a data subject or another person.
- Where the processing is necessary for performing a task in the public interest or in the exercise of official authority vested in the data controller.
- Where the processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by interests, rights, or freedoms of the data subject.

## Sharing Your Personal Data:

- Your personal data will be treated as strictly confidential. They will only be accessible by members (staff and contractors) of the PACT Communities team. We will only share your data with parties outside the organisation with your consent or where we are obliged to do so for legal reasons or if there is a safeguarding concern.
- Your personal data will be stored on a secure database or locked cabinets and only accessible by the PACT Communities team.
- In cases where we believe you could receive enhanced support and have your consent, we will share information about you with other professionals and organisations.
- In exceptional circumstances, such as reporting severe self-harm, posing a threat to others, or sharing serious issues such as abuse or exploitation, we may share your information without express consent.
- For monitoring, statistical reporting and benchmarking, we will share anonymised data with third parties to comply with funding contracts.

## How long do we keep Your Data?

- Unsuccessful referrals received directly from you or via a 3<sup>rd</sup> party organisation will be retained for 18 months.
- Electronic copies of your support plan, and case notes will be retained for 3 years from the date that your case is closed. The exception to this is:
  - Suppose multiple children from a family are referred. In that case, circumstances will not be considered closed until all children and parents have received the requested support.
- Unless an exception applies, hardcopy versions of your file will be retained up to 6 months from when you stop receiving our services or disengage.

- Official complaints and records relating to safeguarding matters will be retained for at least 10 years.

## What rights do you have?

1. You have the right to request a copy of the personal data that we process on you. Please note that certain exceptions may apply to your requests, restricting the information disclosed to you.
  - Please be aware that your child has the right to their personal data.
  - Suppose we receive a subject access request for information from a child. In that case, we will assess their maturity to understand their rights.
  - Suppose a parent or guardian requests a copy of the child's personal data on their behaviour. we may withhold giving out information if we feel that it would have a negative effect on their or their child's safety.
  - You have the right to be informed about how we process your personal data, how it is stored, how long we retain your data and who it may be shared with. This privacy notice acts as our 'fair processing notice'.
2. You have the right to request that we update inaccurate personal data that we are processing on you.
3. In limited situations, you have the right to request that we delete your personal data. For example, if you have revoked your consent or if we have retained your personal data for longer than is legally required.
4. You have the right to object to using your personal data for direct marketing. For example, you can unsubscribe from our newsletters at any time.
5. The right to portability allows you to obtain and reuse your personal data for your own purpose across different services.
6. You have the right to complain to the Information Commissioner's Office if you feel we are not processing your personal data per UK data protection law.

## Transfers outside of the UK and European Economic Area

We store all personal data we are responsible for within the UK and European Economic Area. We do not transfer your personal data to other countries where data protection laws may not be as strong.

## Contact Details

To exercise your relevant rights, to ask a question, or to make a complaint, please, in the first instance, contact the Data Protection Lead – IT Operations Manager.

If you wish to contact us, please email [info@pactcharity.org](mailto:info@pactcharity.org) or write to us at PACT Head Office, 7 Southern Court, South Street, Reading RG1 4QS or telephone 0300 456 4800.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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