

Department for People

Privacy Notice for Holiday Activities and Food Programme (HAF)

Information Held About you

South Gloucestershire Council has partnered with Eegu as part of the governments Holiday Activities and Food Programme (HAF) to deliver activities and healthy meals during the school holidays for children of families aged 5 to 16 years old eligible to benefited related free school meals.

In order to provide the activities to you and your family it is necessary to collect and hold personal information about you and your child/ren. This information will include:

- Full name of child
- DOB/age
- Eligible for benefits (Free School Meals - FSM etc.)
- Home Address
- School
- Gender
- Any health or other needs related to help keep children safe
- Ethnicity

Eegu will collect personal data from providers and families to ensure the smooth running of the programme.

South Gloucestershire Council and Eegu will handle personal data in accordance with the UK General Data Protection Regulation and Data Protection Act 2018 and other relevant legislation and will not disclose your data to any other third party, unless allowed or required to do so by legislation.

For further details about the processing of your personal data please see the council's Data Protection web page [General privacy notice | BETA - South Gloucestershire Council \(southglos.gov.uk\)](#) and Eegu's Privacy Policy [Eegu Privacy Policy](#).

Who is processing my data

All personal data held, is processed in accordance with data protection law. The Data Controller for the information outlined in this privacy notice is South Gloucestershire Council.

Eegu is working as a Data Processor and will process your information on behalf of the council.

How will we use the Information we hold about you

We will collect information about you (where applicable) to:

- Determine the eligibility of children for the Holiday Activities and Food (HAF) Programme
- Connect parents and providers in high-risk groups to support children so they have a high-quality activity with food over the school holidays
- Share any medical or personal data (e.g., food allergies, additional needs) to help keep children safe
- Co-ordinate an effective response to the HAF programme funding from the council and the wider community

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- To contact you with service updates relating to the HAF programme

What is the legal basis for us to process your data

This information processing is considered to be part of South Gloucestershire Council's public task. The processing and sharing of personal data in this way is required for the purpose of coordinating the HAF programme effectively, as outlined in the Department for Education (DfE) HAF guidance:

[Department for Education HAF guidance](#)

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before processing any special category personal data. (Including ethnicity and health data).

Who we will share your information with

We may share your information with partner organisations, including:

- Activity Providers where parents have signed their child up to complete an activity
- Council, voluntary and community groups to provide the support required
- Anonymised data will be shared with the Department for Education for the purpose of submitting the HAF programme data return which is a requirement of the funding received by South Gloucestershire Council

We will not normally share your information with organisations other than our partner organisations without your consent, however, there may be certain circumstances where we would share without consent such as where we are required to do so by law, to safeguard public safety, and in risk of harm or emergency situations.

Any information which is shared will only be shared on a need-to-know basis, with appropriate individuals. Only the minimum information for the purpose will be shared.

How long do we keep your records

We will only retain your personal HAF data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of managing your HAF booking needs or DfE reporting requirements.

We will retain your personal HAF data so that you can book future activities without the need to re-enter information. Data collected for the HAF programme during checkout will be kept until the Termination of the Data Processing Agreement in place with Eequ.

Eequ's Privacy Policy details how Eequ may retain your personal data for the purpose of using the booking platform for other non-HAF activities: [Eequ Privacy Policy](#)

All information will be held securely and destroyed under confidential conditions.

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Your rights

You have a number of rights under data protection law, including the right to request your information and to request that the information be amended or erased if incorrect.

To request your records, you will need to contact the Data Protection Officer, South Gloucestershire Council, Badminton Road, Bristol BS37 0DE or via email: DPO@southglos.gov.uk

You also have a right to make a complaint about our handling of your personal data to the Information Commissioner's Office <https://ico.org.uk/>

Providing Accurate Information

It is important that we hold accurate and up to date information about you in order to assess your needs and delivery the appropriate services. If any of your details have changed, or change in the future, please ensure that you inform us as soon as possible so that we can update your records.

Further information

If you have any questions or concerns about how your information is used, please contact HAF@southglos.gov.uk in the first instance.

You can also contact the Data Protection Officer at South Gloucestershire Council via e-mail at DPO@southglos.gov.uk

More information about data protection and how it applies to you can be found on the Information Commissioner's Office website at <https://ico.org.uk/>

[School holiday activities and food programme | South Gloucestershire \(southglos.gov.uk\)](#)

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