



# HILLINGDON

## LONDON

### **DATA PROTECTION PRIVACY NOTICE FOR HOLIDAY ACTIVITIES AND FOOD PROGRAMME (HAF)**

#### **Why are we providing this Notice to you**

The London Borough of Hillingdon partners with Eequ to deliver the government-funded Holiday Activities and Food Programme (HAF). This programme provides activities and healthy meals for children aged 5 to 16 who are eligible for benefit-related free school meals.

To deliver these services, we must collect and hold personal information about you and your child/ren. This Privacy Notice explains what data we collect, how we use it, the legal basis for doing so, who we may share it with, and your rights under data protection law.

#### **What personal data do we hold**

To coordinate and provide HAF activities, we may collect and hold the following information:

- Full name of child
- Date of birth / age
- Eligibility for benefits (including Free School Meals)
- Home address
- School name and local authority
- Gender
- Ethnicity
- Any health or other needs necessary to help keep children safe

Eequ may collect personal data from providers and families to support the smooth running of the programme.

#### **What is our purpose for processing your personal data**

We collect and process personal data to:

- Determine eligibility for the Holiday Activities and Food (HAF) programme
- Connect parents and providers to support high-quality activities and meals
- Share medical or personal data (e.g., allergies, additional needs) to help keep children safe
- Coordinate an effective HAF programme across the council and wider community
- Contact you with updates relating to the HAF programme

#### **What is the legal basis for our use of your personal data**

Processing of HAF data forms part of the London Borough of Hillingdon's public task.

The legal basis for processing your personal data is:

- Article 6(1)(e) UK GDPR – Public task / exercise of official authority

This includes the processing and sharing of data necessary to coordinate the HAF programme, as set out in Department for Education (DfE) guidance.

### **What we do if your personal data is sensitive**

If any special category data (such as health information or ethnicity) is collected, we:

- Process it only where necessary for safeguarding, safety, or programme delivery
- Keep it secure and limit access strictly to those who need it
- Share only the minimum information required for the specific purpose

### **For how long will we hold your personal data**

Personal HAF data is retained only as long as necessary to deliver the programme and meet reporting requirements. Data may be kept to allow you to book future activities without re-entering information. Data collected during checkout is kept until the termination of the Data Processing Agreement with Eequ.

Eequ's Privacy Policy sets out how they may retain data for non-HAF booking purposes. All data is held securely and destroyed under confidential conditions.

### **Organisations that we may share your personal data with**

We may share data with:

- Activity Providers where a child is booked onto an activity
- Council departments, voluntary organisations, and community groups where support is required
- Department for Education (DfE) – anonymised data only, for mandatory programme returns

We will not normally share your information without consent unless required by law or necessary to prevent harm, safeguard individuals, or respond to emergencies. Any sharing will be minimal and on a need-to-know basis.

### **What happens if you provide personal data to us because of a statutory or contractual requirement?**

Some information is required to:

- Confirm eligibility
- Ensure safe and appropriate delivery of the HAF programme

If you do not provide necessary information, we may be unable to offer HAF activities.

### **What happens if your personal data is subject to automated decision-making including profiling?**

No automated decision-making or profiling is used for HAF data beyond standard eligibility checks.

### **Your rights**

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances, you may also have a right to ask us to restrict processing of your data until any errors are corrected, to object to processing or to transfer or in very limited circumstances erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk).

We may from time to time ask for further information from you. If you do not provide such information or ask that the personal data we already hold is deleted or restricted, this may affect the service that we provide to you.

### **Updates**

This Privacy Notice may be updated periodically. The latest version will always be available on the Council's website.

### **Contacting us**

If you have questions or concerns about how your information is used, please contact:

HAFprogramme@hillington.gov.uk

Further information about data protection and your rights is available from the ICO:

<https://ico.org.uk/>

### **Statutory Data Protection Officer**

You may also contact our Data Protection Officer for further information:

Data Protection Officer

Legal Services Civic Centre

High Street Uxbridge UB8 1UW

Email: DPO@hillington.gov.uk