



**SOCIAL VALUE 360 LTD**

# Privacy Notice for Participants Parents and Carers

2026 to 2027 | Version 1.3

Policy owner: Roy Ramrutton, Privacy Lead

Prepared: 23 September 2026

Approved by: Roy Ramrutton, Responsible Director, SOCIAL VALUE 360 LTD

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Next review: 23 September 2027 or earlier if required

## Who this notice covers

Social Value 360 respects your privacy. We handle personal information under the UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. This notice explains how we use personal information when you enquire about, join or take part in our programmes, activities and services. It covers children, young people and adults, predominantly aged 5 to 100, and their parents, carers, representatives and emergency contacts. We collect only information relevant to the activity and the support you need.

Children have their own privacy rights. We explain our use of information in language they can understand. Adults retain control over their own information; being a relative or carer does not automatically entitle someone to access it.

## Who is responsible and how to contact us

Controller and correspondence address: SOCIAL VALUE 360 LTD, 58 Bridge Street, Basildon, Essex, SS15 4AY. Social Value 360 is responsible for the information for which it decides the purposes and means of processing.

Privacy Lead: Roy Ramrutton | [roy@socialvalue360.co.uk](mailto:roy@socialvalue360.co.uk) | 07789 993621. A request or complaint can be made verbally or in writing. You do not need to use a special form. Roy Ramrutton is the Privacy Lead and IT Lead. These are operational roles and do not constitute appointment as a statutory Data Protection Officer. The organisation reviews whether a formal DPO appointment is required and, if so, ensures independence and absence of conflicting duties.

For a commissioned programme, the referring school, local authority, funder or other partner may also be a controller. Where Social Value 360 acts only on another controller's instructions, that controller's notice explains its processing; we will identify the controller and help route your request. Programme information must explain these roles before information is collected.

## Information we collect and where it comes from

We may collect your name, contact details, date of birth or age band, emergency contacts, parent or carer details where appropriate, referral information, booking and consent records, attendance, participation, support plans, progress and feedback. We collect payment and funding eligibility information only where needed for the programme.

We may need relevant accessibility requirements, disability or health information, allergies, communication preferences, safeguarding concerns and incident records. Equality monitoring is

voluntary unless a specific lawful requirement applies. We do not collect extensive medical histories or protected-characteristic information simply because it might be useful.

Information comes from you, an authorised representative, our staff during delivery and, where relevant, referring organisations, schools, local authorities, support professionals and safeguarding agencies. We tell you the source and categories of information received indirectly, within the applicable legal timescale, unless a lawful exception applies.

We use photographs, testimonials and recordings for publicity only with a separate, appropriate permission process. Declining publicity does not affect access to our services. CCTV, biometrics, session recording and device monitoring are not assumed to be routine: before introducing them we must assess necessity and provide a specific notice explaining the actual arrangements.

## **Why we use information and our lawful bases**

**Booking and delivery:** we use identity, contact, attendance and programme information to organise safe services, communicate changes and provide agreed support. Where you personally enter a contract, necessary processing relies on contract. For commissioned or community activities without a contract with you, we normally rely on legitimate interests in delivering and managing the service, after assessing necessity and the impact on you, particularly children.

**Safety and safeguarding:** we use relevant information to assess risk, respond to concerns and share necessary information with safeguarding agencies. The basis depends on the duty and circumstances: legal obligation where a specific law requires processing, legitimate interests where appropriate, or vital interests in a life-threatening emergency. We document the applicable basis; consent is not a prerequisite for a necessary lawful safeguarding disclosure.

**Payments, accounting and funding:** we use information to administer payments and evidence delivery. Contract or legitimate interests may support administration; legal obligation applies to statutory accounting and tax records. A funding contract is not, by itself, a statutory obligation or a public task.

**Evaluation and social value reporting:** we use limited attendance, outcome and feedback information to assess and improve programmes and report delivery to commissioners. We normally use legitimate interests with a balancing assessment and provide anonymous or aggregated reporting wherever possible. Identifiable reporting requires a defined purpose, lawful basis and clear programme information.

**Optional publicity and communications:** we use consent for identifiable promotional photographs, stories and optional marketing where consent is required. Permission specifies the channels and intended use. You can withdraw it through the privacy contact; withdrawal does not affect earlier lawful use. We stop future use and remove material within our control where practicable, explaining any limits for material already distributed.

We use public task only where a particular function has a clear basis in law and the programme notice identifies that basis. We will explain any materially new purpose before using information for it, unless the law permits an exception.

## **Sensitive information**

Health, disability information revealing health, racial or ethnic origin, religion, sexual orientation and other special category information need an Article 9 condition as well as an Article 6 lawful basis. For necessary safeguarding, an applicable substantial public interest condition under the Data Protection Act 2018 may apply, including safeguarding children and individuals at risk where its requirements are met. For optional support information we may use explicit consent where it is freely given and suitable. Legal claims or vital interests may apply in their limited circumstances.

We identify and record the actual condition before processing and maintain an appropriate policy document where required. Criminal offence information has separate Article 10 and Data Protection Act 2018 requirements; it is not treated as ordinary or special category information. We collect it only where authorised and necessary.

## **What you need to provide**

We explain at collection which details are necessary and which are optional. Without essential contact, safety or eligibility information, we may be unable to offer a particular activity safely or confirm funding. We discuss proportionate alternatives and reasonable adjustments. Optional equality monitoring, feedback and publicity permission can be declined without penalty.

## **Who we share information with**

We share the minimum necessary information with authorised delivery staff, approved service providers, referring organisations and commissioners where needed for the stated purpose. Other recipients may include health professionals, local authority safeguarding teams, police, insurers, legal advisers and regulators where there is a lawful need.

Processors such as approved booking, IT or storage providers must act under suitable written terms. Independent controllers are responsible for their own use of information. We do not automatically report all participants to the Department for Education, a school census, Ofsted or a national pupil database. Any programme-specific statutory sharing must be identified separately.

We consider the participant's wishes, age, understanding, authority of any representative and safety before sharing with parents or carers. Information is not shared with family members merely because the participant is an adult with support needs. We do not sell personal information.

## **International transfers and security**

We restrict access by role, use approved secure systems and train staff in confidentiality. If a supplier or recipient processes information outside the UK, we check the location and relevant UK transfer rules. We use an applicable adequacy arrangement or appropriate safeguards and any required transfer assessment. You can ask the privacy contact about the countries, safeguards and how to obtain a copy or description of them.

## **How long we keep information**

We use the Data Retention Policy and its schedule. Routine participant and attendance records are normally kept for the programme period plus two years; essential contract or funding evidence may need six years after closure. Child safeguarding records are reviewed at age 25 and adult safeguarding records normally six years after closure, subject to case-specific requirements, legal holds and the documented safeguarding retention decision. These are organisational defaults, not universal statutory periods.

Publicity permission is reviewed at least annually and use ends when permission expires or is withdrawn. Unneeded copies and obsolete contact information are removed sooner. Ask us for the precise period applying to your programme or record.

## **Your choices and rights**

Depending on the circumstances, you can request access, correction, deletion, restriction or portability of your personal information, object to processing based on legitimate interests or public task, and withdraw consent. You can object to direct marketing at any time. Some information must be retained or shared despite a request, for example where the law requires it; we explain any restriction.

Contact the privacy lead verbally or in writing. We take proportionate steps to check identity and a representative's authority. We normally respond without undue delay and within one calendar month. Where a lawful extension or clarification rule applies, we explain it and the revised timing. Requests are normally free; any permitted fee or refusal will be explained.

A child who can exercise their rights may do so directly. Parents can act where authorised or otherwise entitled, with the child's interests and understanding considered. We support accessible communication and requests made with assistance.

We do not make solely automated decisions with legal or similarly significant effects under this notice. Any proposed use requires a separate assessment, notice and applicable safeguards, including a route to meaningful human review.

### **Concerns and changes**

Please raise privacy concerns through the privacy contact. We aim to acknowledge within five working days and always within 30 calendar days, investigate appropriately, keep you informed and provide an outcome without undue delay. You may complain to the ICO at <https://ico.org.uk/make-a-complaint/> or telephone 0303 123 1113. The ICO normally expects you to raise the issue with us first.

We review this notice annually and when our processing changes. We provide or draw attention to material updates. Copies and accessible explanations are available from the privacy contact.

### **Information for younger participants**

We keep information such as your name, who to contact and what helps you join in safely. We use it to organise activities and help keep you safe. Only people who need it for their work should see it. If we are worried about someone's safety, we may tell people who can help. You can ask us what we know about you, ask us to correct a mistake or tell us if something worries you. Ask a member of staff or a trusted adult to help you contact us.