



## Privacy Notice Healthy Child Programme

When processing your personal data, the council is required under Articles 13 and 14 of the General Data Protection Regulation (GDPR) to provide you with the information contained in this document.

### Data Controller

<b>Name</b>	Cumbria County Council
<b>Address</b>	Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
<b>Registration Number</b>	Z5623112

You can search the Information Commissioner's Register of Fee Payers at:  
<https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

### Data Protection Officer

The council's Data Protection Officer is Claire Owen. You can contact the Data Protection Officer by:

Email: [dataprotection@cumbria.gov.uk](mailto:dataprotection@cumbria.gov.uk)  
Post: Cumbria County Council, Legal and Democratic Services, 1<sup>st</sup> Floor,  
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD  
Online: [Contact Form](#)

### Purpose

The Healthy Child Programme (HCP) is a multi-agency approach to provide a range of universal and targeted interventions. Services will be provided by Registered Health Professionals, e.g. Health Visitors, Public Health Nurses and Strengthening Families Officers working alongside other professionals

There are 3 priorities:

- **Priority 1: Children and young people are healthy:**
  - Children and young people will have the same opportunity for good health
  - Children and young people enjoy positive mental and emotional health and wellbeing
  - Children and young people maintain a healthy weight and good levels of physical activity
- **Priority 2: Child and young people are safe:**
  - Children and young people live in supportive, resilient and economically secure families
  - Children and young people are protected from abuse and neglect
  - Children and young people stay safe online
- **Priority 3: Children and young people are achieving:**
  - Children and Young People achieve their full potential for educational attainment
  - Disadvantaged children and young people achieve as well as their peers
  - Children and young people have opportunities and aspirations for the future

By working directly with Children, Young People, Parents and Carers the Healthy Child Programme plays a critical role in preventing Children and Young People needing to be placed on a Child in Need (CIN) or Child Protection (CP) Plan, needed to become a Child Looked After (CLA) or entering the Youth Justice system.

## Data Collection

Registered health professionals will receive referrals and work with children and young people from a variety of sources.

HCP professionals will work with Schools; Early Years settings; Colleges; Third Sector Children and Youth Groups; Sports group; Uniform groups; Mental Health Support Groups; SEND support Groups; LGBT Groups; Elective Home Education; Faith Groups; Children's Centres and Other

## Data Types

The following data is required to meet legal obligations and to enable officers to reach informed and robust recommendations and decisions:

- Name
- Age
- DOB
- Contact details
- Gender

We may also collect, store and use the following 'special categories' of more

sensitive personal information:

- Family lifestyle
- Physical/Mental Health or condition
- Racial/Ethnic Origin
- Religion or other beliefs
- Sexual Life/Orientation

## Legal Basis for Processing Data

When we collect your personal data (such as name, age, address) we rely on the following legal bases:

- **GDPR Article 6(1) (e) Public Task/Public Interest/Official Authority**

Where the council is relying on GDPR Article 6(1)(c) all [Relevant Legislation](#) is listed below.

When we collect your 'special categories of personal data', (such as health, race, ethnicity, sexual orientation) we rely on the following legal bases:

- **GDPR Article 9(2) (d) Legitimate activities**

## Relevant Legislation

These legal bases above are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities, including:

- Human Rights Act
- Children's Act 1989 Section 47, Section 17, Section 23-24
- Children's Act 2004
- Children and Social Work Act 2017
- Care Leavers Regulations 2010
- Care Planning, Placement and Review Regulations 2010
- Children and Young Persons Act 2008
- Children and Families Act 2014
- Health and Social Care (Safety and Quality) Act 2015
- Health and Social Care Act 2012

Guidance:

- HM Government - Working Together (March 2018) guidance
- Department for Education and Department of Health - Promoting the health and well-being of looked after children (March 2015) Statutory Guidance
- Department of Health - Healthy Child Programme Guidance (2009)
- What to do if you are worried a child is being abused; Advice for practitioners (PDF) (Department of Education 2015)
- Mandatory reporting of female genital mutilation (FGM) (PDF) (Home Office 2016)

## Automated Decision-Making/Profiling

We do not use your information for automated decision-making or profiling purposes.

## Data Transfers

Your personal data is not transferred to a third country or international organisation.

## Redaction

We operate a policy where we routinely redact the following details before making forms and documents available online:

- contact details e.g. telephone numbers, email addresses
- signatures
- personal or special category data
- information agreed to be confidential or commercially sensitive

Occasionally it may be considered necessary, justified, and lawful to disclose data that appears in the list above. In these circumstances the council will make all reasonable efforts to contact you if this processing is going to have an impact on your rights or privacy.

## Data Sharing

We may share your information with the following organisations:

- Service Providers
- Voluntary Agencies

While responding to your needs, enquiries or complaints it may be necessary to share your personal data with other parts of the council or other public bodies or organisations. The council will make all reasonable efforts to contact you if this processing is going to have an impact on your rights or privacy.

## Data Security and Retention

All the information you give us will be kept safe and secure whether it is written or on a computer system. We will treat any personal information confidentially and will comply with the Data Protection Act 2018. This means that if we keep any of your personal data we must:

- tell you what information we need to collect from you
- only use the information for the reason we have agreed with you
- not ask for more information than we need to provide the services
- let you see any information we have collected about you, on request
- keep the information safe, secure, and confidential
- personal information will be deleted in accordance with council policy

The information you supply will be kept on a secure council system and can only be accessed by authorised employees within the [INSERT TEAM].

Cumbria County Council will only store your information for as long as is legally required in accordance with the council's Retention and Disposal or in situations where there is no legal retention period established best practice will be followed.

If you have any questions about the Schedule please contact:  
[recordcentre@cumbria.gov.uk](mailto:recordcentre@cumbria.gov.uk).

## Your Rights - Data Subject Access

The General Data Protection Regulation (GDPR) provides you with the right to access information the council, as a public authority holds about you. Upon receipt of a valid request the council will:

- provide you with a response within one month.
- let you know if your request is subject to an extension.
- make reasonable efforts to comply with the format of your request.
- inform you if your request is going to be refused or a charge is payable.

You can make a Data Subject Access Request by contacting:

Email: [information.governance@cumbria.gov.uk](mailto:information.governance@cumbria.gov.uk)  
Post: Cumbria County Council, Information Governance Team  
Parkhouse, Baron Way, Carlisle CA6 4SJ  
Telephone: (01228) 221234  
Online: [Contact Form](#)

## Your Rights - Other

In addition to your right of access the General Data Protection Regulation (GDPR) also gives you the following rights:

- the right to be informed via the council's Privacy Notice.
- the right to withdraw your consent. If we are relying on your consent to process your data, then you can remove this at any point.
- the right of rectification, we must correct inaccurate or incomplete data within one month.
- the right to erasure. You have the right to have your personal data erased and to prevent processing unless we have a legal obligation to process your personal information.
- the right to restrict processing. You have the right to suppress processing. We can retain just enough information about you to ensure that the restriction is respected in future.
- the right to data portability. We can provide you with your personal data in a structured, commonly used, machine readable form when asked.
- the right to object. You can object to your personal data being used for profiling, direct marketing, or research purposes.

- you have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Unless otherwise stated above you can exercise any of these rights by contacting:

Email: [dataprotection@cumbria.gov.uk](mailto:dataprotection@cumbria.gov.uk)  
Post: Cumbria County Council, Legal and Democratic Services, 1<sup>st</sup> Floor,  
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD  
Online: [Contact Form](#)

## Verifying Your Identity

When exercising the rights mentioned above please be aware that under GDPR Article 12(6) additional information can be requested to verify that you are the data subject if your identity is unconfirmed. Please note that:

- additional documentation is only required when the council cannot verify your identity using internal council systems that relate to the service you are requesting information about.
- the council will contact you for this documentation prior to processing your request.
- the statutory deadline for responding to your request will start when you have provided the additional documentation.
- failure to provide additional documentation may lead to the council rejecting your request.

## Complaints

If you have any concerns about the information contained in this Privacy Notice please contact: [Lindsey.ormesher@cumbria.gov.uk](mailto:Lindsey.ormesher@cumbria.gov.uk)

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If you have concerns about the way the council has processed your data, please contact the council's Data Protection Officer via:

Email: [dataprotection@cumbria.gov.uk](mailto:dataprotection@cumbria.gov.uk)  
Post: Cumbria County Council, Legal and Democratic Services, 1<sup>st</sup> Floor,  
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD

Online: [Contact Form](#)

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>