

West Faversham Community Association

Privacy Notice – Childcare, youth and community services

Version: 1.0

Date: September 2026

Review date: September 2027, or earlier following a material change

1. Who we are

West Faversham Community Association (WFCA) operates West Faversham Community Centre and a range of facilities, activities and events.

WFCA is the **data controller** for the personal information covered by this notice. This means we decide why and how your personal information is used.

Contact address: WFCC, Bysingwood Road, Faversham, Kent

Data protection contact: Chief Executive

Email: info@westfavershamca.org

This notice applies to:

- children and young people attending WFCA youth services;
- parents and carers;
- emergency contacts;
- adults taking part in community activities;
- volunteers or participants where information is collected as part of an activity;
- people referred to WFCA services; and
- professionals involved in referrals or support.

2. Information we may collect

The information collected depends on the service.

For youth services this may include:

- name;
- date of birth;
- address and postcode;
- telephone or email details;
- parent/carer details;
- emergency contacts;
- school;
- attendance and sessions attended;
- health and medical information;
- allergies;
- SEND or additional-support needs;
- permissions and consents;

- relevant behaviour or risk information; and
- information necessary to provide appropriate support.

For community services and activities we may collect:

- name;
- contact information;
- activity registration;
- attendance;
- emergency-contact information; and
- health information where relevant to safe participation.

Some activities do not require formal registration.

3. How we collect information

Information may be collected:

- directly from you;
- from a parent or carer;
- through Microsoft Forms;
- through Club Manager for certain community activities;
- during your involvement with a service;
- from schools;
- from KCC;
- from VSK;
- from social workers;
- from another referral organisation; or
- from another professional involved in your support.

Where information is received from another organisation, WFCAs only use information relevant to delivering the service, managing risk or carrying out safeguarding responsibilities.

4. Why we use information

We use information to:

- register people for services;
- deliver youth and community activities;
- manage attendance;
- communicate about sessions or activities;
- understand health, support or accessibility requirements;
- manage emergencies safely;
- provide appropriate support;
- monitor participation;
- evidence delivery of funded programmes;

- produce anonymous monitoring and evaluation information;
- assess referrals;
- coordinate support with partner organisations;
- manage risk;
- safeguard children, young people and adults at risk;
- investigate incidents or complaints; and
- comply with legal and contractual requirements.

5. Our lawful bases

Depending on the service and purpose, WFCAs may rely on:

Legitimate interests – particularly for operating free community and youth services, managing attendance, communicating about activities, maintaining safety and carrying out appropriate service administration.

WFCAs assesses these interests carefully, particularly where children and young people are involved.

Contract – where a participant has booked or paid for a service and processing is necessary to provide it.

Legal obligation – where WFCAs are required to process or disclose information to comply with a specific legal duty.

Consent – where a genuine choice exists and we ask you to agree to an optional use of information.

Vital interests – in exceptional emergencies where processing is necessary to protect someone's life or serious physical safety.

6. Health, SEND and other sensitive information

Youth and community services may need information about:

- medical conditions;
- allergies;
- disability;
- SEND;
- additional needs; or
- other information relevant to safe and appropriate participation.

This is known as special-category personal data and receives additional legal protection.

Where providing the information is genuinely optional, WFCAs may rely on explicit consent.

However, we do not rely on consent where information must be used to deal with an emergency, meet a legal responsibility or safeguard a child or person at risk.

7. Youth registration and attendance

Youth-service registration is normally completed through **Microsoft Forms**.

Registration information may include personal details, parent/carer information, emergency contacts, health information and support needs.

Youth attendance is recorded separately and currently includes:

- name;
- postcode; and
- session attended.

Attendance information is maintained using an Excel record populated from Microsoft Forms.

Historical attendance may be used to:

- understand service engagement;
- evidence service delivery;
- manage safety;
- support funding requirements; and
- produce monitoring information.

Funders normally receive **anonymous totals and outcomes rather than identifiable participant information**.

8. Community activities

Some community activities use **Club Manager**, some use **Microsoft Forms**, and others allow people to attend without formal registration.

Where personal information is required, WFCAs aim to collect only basic details needed to administer the activity and any health information genuinely relevant to safe participation.

9. Safeguarding and CPOMS

WFCAs use **CPOMS** to record safeguarding concerns and relevant individual case information.

Safeguarding records may include:

- concerns raised by staff or another person;

- disclosures;
- actions taken;
- relevant family or school circumstances;
- risks;
- professional contacts;
- health or support information;
- safeguarding history; and
- allegations or information relating to possible criminal offences.

Safeguarding information is only accessible to authorised personnel according to their role.

Where necessary to protect a child, young person or adult at risk, WFCAs may share information with organisations such as:

- KCC Children's Services;
- schools;
- social workers;
- VSK;
- police;
- emergency services; or
- another appropriate safeguarding agency.

We do **not** require consent where relying on consent would prevent or undermine necessary safeguarding action.

10. Referrals

WFCAs may receive referrals from KCC, schools, VSK, social workers or other organisations.

Referral information may include:

- care status;
- professional contacts;
- EHCP-related information;
- health or SEND information;
- family circumstances;
- behaviour information;
- risks;
- safeguarding information; and
- previous support.

We use this information to assess whether WFCAs can appropriately provide a service, plan support, manage risks and coordinate with other organisations.

We aim not to retain complete referral information where a shorter and accurate record is sufficient for our purposes.

11. HAF provision

Where someone attends WFCAs through the Holiday Activities and Food programme, information is processed through the **KCC/HAF system**.

WFCAs enter and access information within that system to deliver HAF provision, manage participants and record attendance.

KCC can also access information held within its system.

KCC and WFCAs have their own responsibilities for the information they process. The precise data-sharing and system roles are governed by the applicable KCC/HAF arrangements.

12. Surveys and evaluation

WFCAs may ask participants to complete surveys or provide feedback.

Microsoft Forms may be used for this.

Where possible, information provided to funders and external organisations is **anonymous** and reports overall participation, outcomes or feedback rather than identifying individual service users.

13. Photography and events

Where a community or youth activity forms part of a wider event at which photography or filming takes place, event photography notices may apply.

WFCAs' current event notices advise attendees where photography or filming will take place and state that attendance is treated as consent.

WFCAs are reviewing its event-photography arrangements separately. This notice does not introduce a new photography or consent model.

Where a specific service separately seeks consent for photography, the information provided at the time of consent will apply.

14. CCTV

People attending WFCAs community or youth services may enter areas covered by CCTV.

WFCA operates video-only CCTV for site security, protection of people and property and investigation of incidents.

Routine footage is retained for approximately **three weeks**.

Relevant footage may be kept longer where needed for an incident, safeguarding matter, police investigation or legal claim.

15. Who we may share information with

Depending on the circumstances, we may share information with:

- KCC;
- schools;
- VSK;
- social workers;
- safeguarding agencies;
- police;
- emergency services;
- funders where identifiable information is specifically required and lawfully justified;
- professional advisers;
- insurers; and
- organisations involved in delivering the relevant service.

Technology providers supporting these services include Microsoft, Club Manager and CPOMS.

Regular or higher-risk information sharing is documented within WFCA's Data Sharing Register.

We do not sell personal information.

16. International processing

Some technology suppliers may use systems or sub-processors outside the UK.

WFCA is reviewing international-transfer arrangements as part of its supplier compliance work. Appropriate UK data-protection safeguards must be used where personal information is transferred internationally.

17. How long we keep information

Different information has different retention requirements.

Routine registration, emergency-contact and health information should not be retained longer than necessary after someone stops using a service.

Attendance records are kept for an appropriate operational and funding period and should be anonymised where identifiable information is no longer needed.

Safeguarding records have separate retention requirements and may need to be retained substantially longer than routine service records.

Referral, incident, complaint or legal records may also be retained for longer where necessary.

Detailed periods are contained in WFCA's Data Retention Schedule.

18. Your rights

Depending on the circumstances, you may have the right to:

- access your personal information;
- have incorrect information corrected;
- ask for information to be deleted in certain circumstances;
- ask us to restrict processing;
- object where we rely on legitimate interests;
- withdraw consent where consent is the basis for processing; and
- exercise other rights provided by UK data-protection law.

For information about a child or young person, the individual who is entitled to exercise these rights will depend on the young person's age, understanding and the circumstances.

To make a request, contact the Chief Executive.

19. Complaints

If you have concerns about the way WFCA has handled personal information, please contact the Chief Executive.

You also have the right to complain to the **Information Commissioner's Office (ICO)**.

20. Changes to this notice

This notice is reviewed at least annually and when there is a significant change to WFCA's youth or community services, information systems or data-sharing arrangements.