

London Borough of Camden

Early Help Services

Privacy Notice

1. Introduction

Camden's Early Help services, including Integrated Early Years, Family Support and Complex Families and Integrated Youth Support Services (IYSS), aim to support all children to have the best start in life. Their services include developmental reviews by Health Visitors, drop-in stay and play sessions, family support casework, practical and emotional support to families, and specialist support like parenting programmes and speech and language support.

IYSS consists of Youth Early Help, Youth Service, Connexion and Career, FWD Young Person's Substance Misuse, Engage Youth Diversion Project, Youth Justice and Youth Violence and Exploitation Services

Early Help services will hold a wide range of information about you and your family. We use this so that we can provide advice, guidance, assessments, services, support, programmes and safeguarding for children and their families in Camden and meet their needs.

This privacy notice explains how we use any personal information we collect about you.

2. The data controller and Data Protection Officer

The Data Controller is London Borough of Camden, Judd Street, London. WC1H 9JE
www.camden.gov.uk

The Council's Data Protection Officer is Andrew Maughan who is the council's Borough Solicitor. He can be contacted at dpo@camden.gov.uk or via [this link](#)

3. What information do we process (collect, keep, use, share, delete) etc?

We process a range of information about you and your family. This will include some or all the following:

- You and your child's personal information (name, DOB, unique pupil number, address, telephone, email, NHS number)
- Personal information about other members of your household
- Details of family relationships in and outside of your household
- Legal status such as immigration status
- Your accommodation and housing needs
- Details about your physical and emotional well-being and parenting
- Details about your social circumstances
- Details about employment and education
- Details of any risk issues
- Services and/or support you are getting from partner agencies, both historically and current
- Information about your situation given to us by your family/carers and/or other organisations (e.g., GP, school nurse, Police)
- Reports relating to your situation (e.g., safeguarding, and other assessments and plans including early help assessments and plans, Child Protection Plans and Looked After Children reviews)

- Any documents sent to us relating to you
- Educational progress and attainment information
- School attendance, exclusions, and behavioural information
- Records of phone conversations and/or meetings between you or your carers and or representatives and Council staff
- Photographs and videos taken in the nursery
- Attendance on youth projects across the borough
- Other information as individual circumstances require to allow the council to undertake its duties

We also process a range of special category (sensitive) information about you. This will include some or all the following:

- Details about your physical or mental health
- Details about your ethnicity racial or ethnic origin, sexuality, gender, and disability
- Details about your physical and emotional well-being
- Information about your situation which includes health, sexuality, disability etc given to us by your family/carers and/or other organisations (e.g., GP, school nurse, Police)
- Details about any substance misuse
- Other information as individual circumstances require to allow the council to undertake its duties

We also process criminal offence data as follows:

- Details of any criminal offences you or a member of your family have been suspected of, investigated for, charged with, acquitted of, or convicted of, together with any sentences or penalties involved where this is relevant to our work
- whether individuals are a victim/survivor and/or a perpetrator (alleged or proven) where this is relevant to our work
- Other information as individual circumstances require to allow the council to undertake its duties

4. The purpose for which data is processed

We use the data we have and collect for the following uses:

- act in your child's best interests and promote their physical and mental health
- encourage and take into account your child's views, wishes and feelings
- help your child and your family to access, support from the local authority
- tell other public or voluntary services what support you need from them
- provide advice, emotional support, practical assistance, and safety measures
- Identify your needs and record your on-going relationship with us through home visiting or other venue-based contacts.
- Monitor take-up of the service and programmes and ensure that services and programmes are meeting the needs of local families effectively
- Evaluate the impact of specific service activities and programmes on improving outcomes for children.
- Help the government improve services in the borough in the future.
- Prevent crime and fraud, and assist other public bodies to do their work safely and effectively
- Help you to be a part of your child's life in nursery and share in their development

5. Agencies we may share your data with

a. Explanation:

To allow the council to carry out its duties properly it may need to share some, or all information listed in section 3 with some, or all the other parties listed below. We only share information when the law (and our policies) allows or require us to. Information is only shared where it is necessary to do so, and information is always shared securely.

Information listed in section 3 may also be requested from other parties, to allow the council to undertake its duties effectively.

The council does not need consent to share data with other organisations because consent is not the legal basis. This is explained in section 12. Where possible we will tell you what data is being shared and why, but in some cases, we do not have to do that. An example would be where we are asking for information from the police or where we are sharing safeguarding information with another organisation to alert that the child concerned may be at risk of harm.

We also undertake general data matching or data sharing in certain areas for the prevention or detection of crime. More details on this are available on the Council's general privacy page at www.camden.gov.uk/privacy

The council has a number of data sharing agreements with agencies to cover data sharing, the main ones are available here [Data Sharing Agreements \(DSAs\) | Open Data Portal \(camden.gov.uk\)](#)

b. List of parties we may share data with:

- Other council services such as Children's Social Work Service, Housing, Adults' Social Care, Legal Services, Data Protection, and Information Rights
- Commissioned services for example physical health services, emotional health services, homelessness services, carers services, special educational needs services, safeguarding services
- GPs and other health professionals, Local NHS Foundation Trusts for example Mental Health Services and hospitals, Local Clinical Commissioning Groups, Midwives and Health Visitors
- Education (including early years) and Schools
- Police, Probation, Youth Offending Service
- Mental health services, Drug and alcohol services, Domestic abuse services
- Relevant voluntary, community and faith organisations
- Other local authorities such as councils, Fire and Rescue services
- Ofsted.
- Central Government departments for example Ministry for Housing, Communities and Local Government, The Department for Education, Department for Work and Pensions etc
- Where you have a child in a council-maintained nursery and have consented to using the eyLog Parent application, there will be occasions when video clips/pictures of your child will be included in clips and pictures shared with other parents via the app (e.g., when your child and theirs are engaging in an activity).

6. Storing and retaining personal data

Early Help Services holds data securely on our electronic case recording system MOSAIC, Core IYSS, Childview and the National Drug Treatment Monitoring Service (NDTMS) in shared drives and in Office as necessary. The council use technical and organisation measures to keep information safe and secure.

We will keep information until your child is 25 as part of the Council's statutory duty. If you are over 18, we will keep any information you share with us for six years.

If you consent to using the eyLog Parent application, which is used in Council-maintained nurseries, the Service will use the eyManage nursery management system (which is owned

by Eyworks Limited) to share photos and/or short videos of your child with you as part of their learning journey. As explained in 5b above, there will be instances where videos including your child interacting with others is shared with other parents. In these cases, the other child will be the focus, but your child may be included in footage (e.g. of children playing cooperatively). Eyworks will own the data and information, but Camden will manage the data in accordance with the provisions outlined in this Privacy Policy.

7. Do I have to provide this information and what will happen if I don't?

If you do not provide us with your information, we will be unable to provide you with the support you require.

8. Transferring data out of the EU/EEA

If you participate within the Parent-Child Psychological Support programme (PCPS), the Integrated Early Years Service will share information for supervision, consultation, and evaluation purposes, with the Instituto Psicologico De Infancia Y Familia (IPINFA) based at the University of Valencia. To ensure informed consent to participate within the PCPS programme you will be asked to complete an Information Sharing and Video Recording consent form.

Otherwise, Early Help Services will not transfer data out of the EU/EEA unless a child goes to live in a country outside the EU/EEA. In these circumstances, we will liaise with the appropriate authority in that country to facilitate the lawful and secure transfer of data

9. Automated decision making

We do not use automated decision-making or profiling to process your personal data.

10. Your data subject rights and requesting access to personal data

Under data protection legislation, parents, carers, and children have the right to request a copy of information we hold about them. Parental access to a child's data is not automatic and may be restricted where appropriate. Where the child is aged 13 and over, they must consent to a parent having access.

There are other data subject rights which can be seen on our website [Your rights - Camden Council](#). Please see the ICO website <https://ico.org.uk/> for more information.

To make a request for your personal information or to exercise other data protection rights please use our web form [Your rights - Camden Council](#)

11. The right to lodge a complaint with a supervisory authority

You can complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal data. It would be helpful if you contacted us first at dpa@camden.gov.uk to see if we can resolve the problem. You can contact the ICO without charge, Telephone: 0303 123 1113, live chat <https://ico.org.uk/global/contact-us/live-chat/> or webform <https://ico.org.uk/global/contact-us/>

12. Legal basis for processing information

Our legal basis for processing is:

Personal data:

UK GDPR article 6(1)(c) (Legal duty) and article 6(1)(e) (public task). For PCPS and EyLog only article 6(1)(a) consent

Special category data:

For PCPS and EyLog only article 9(2)(a) explicit consent

For all other processing:

9(g) Reasons of substantial public interest (with a basis in law).

9 (h) Health or social care (with a basis in law).

For (g) the Data Protection Act 2018 Schedule 1 Part 2 conditions are paras 6 (Statutory and government purposes), and 18 (Safeguarding of children and individuals at risk) with the underlying laws being those described below

For (h) the Data Protection Act 2018 Schedule 1 Part 1 conditions are: paras 1 (Employment, social security, and social protection) and 2 (Health or social care purposes), with the underlying laws being those described below

Criminal offence data: UK GDPR Art 10 requirements met by the article 6 legal basis above and the Data Protection Act schedule conditions as described above.

The underlying laws relied on are:

- Children Act 1989 sections 17 and 47, and sched 2 part 1
- Children Act 2004 sections 10 and 11
- Childcare Act 2006, section 1
- Children and Families Act 2014, section 23 and 25
- Welfare Reform Act 2012
- Criminal Justice and Court Services Act 2000
- Crime and Disorder Act 1998 section 17,37 and 115
- Equality Act 2010
- National Health Service Act 2006, section 82
- Education Act 2002
- Education and Skills Act 2008
- Localism Act 2011
- Digital Economy Act 2017
- Special Education Needs and Disability Regulations 2014
- Immigration and Asylum Act 1999