

## **HOUNSLOW EARLY HELP PARTNERHIP PRIVACY NOTICE 2019-2021 (September 2019)**

The London Borough of Hounslow (LBH) is committed to protecting and respecting your privacy. Through this Privacy Notice we have sought to be as transparent as possible and fully explain how your personal data is held and processed.

This privacy notice applies to services provided by the Hounslow Early Help Partnership and tells you what to expect us to do with your personal information.

If you have any questions about this privacy notice or any concerns about how we process your data, please contact Hounslow Early Help Hub on 0208 583 6653. The privacy notice will continue to be monitored and updated. You are advised to check this page from time to time.

### **What type of information we have**

The Hounslow Early Help Partnership (HEHP) is a group of services, run by different agencies, which offer preventative support to families. These services have agreed to work together as a partnership in order to provide the best quality of early help to families in Hounslow. The following services and organisations are members of the Partnership:

- London Borough of Hounslow Education & Early Intervention services
- London Borough of Hounslow Children's Safeguarding & Specialist Services
- London Borough of Hounslow Community Safety services
- London Borough of Hounslow Housing services
- Hounslow & Richmond Community Healthcare Trust
- Metropolitan Police Service, Safer Schools Team
- Hounslow Education Partnership
- Hounslow Voluntary Sector Support Services
- Chelsea and Westminster Hospital NHS Foundation Trust
- Hounslow CCG
- Hounslow Safeguarding Children's Board

London Borough of Hounslow, as the co-ordinator of the Partnership, is responsible for collecting information from these services about families who are receiving early help to assist with monitoring and improving the effectiveness of the support the Partnership delivers.

LBH currently collects and processes the following information on behalf of the Partnership:

- Name
- Address
- Phone number
- Date of birth
- Gender
- Ethnicity
- Details of disabilities
- Language spoken and/or communication needs
- Support needs (such as what is working well and what you are worried about)
- Actions you are working towards on your support plan and the progress you are making with these
- Details of services you access through the Partnership

- Details of any relevant criminal offences (such as youth offending, domestic abuse, young person missing from home, crime and anti-social behaviour) from the Police
- attendance and exclusion information, pupil characteristics, and unique pupil number, from your child's school
- involvement with other LBH services from our existing records

### **How do we get your information?**

Services in the Early Help Partnership will collect information from you while they are working with you. This may be stored within services' own systems and then passed to LBH as the co-ordinator of the Partnership securely by e-mail, or may be recorded directly onto a secure electronic case management system hosted by LBH. In the latter case, LBH will access information directly from the case management system.

Most of the personal information processed by LBH is provided to a practitioner in the Hounslow Early Help Partnership directly by you for one of the following reasons:

- you have requested information, advice and guidance for yourself or your family (by phone, e-mail or face-to-face)
- you have received early help from one or more services (information given via your CFAN)
- you have worked with services in a Team Around the Family and are attending regular meetings with the practitioners supporting you (information about your early help plan and progress given via minutes of these meetings)
- a practitioner working with you has consulted with other practitioners to receive guidance in delivering the best service to you (via your CFAN and early help plan documents): this may be consultation with the Early Help Hub or a Community Action Partnership Panel

We also receive personal information indirectly. This would be in the following scenarios:

- information we already hold within LBH from your involvement with other services, or
- information we collect as part of our duties as a Council, for example school attendance and exclusion data

If it is not disproportionate or prejudicial, we'll contact you to let you know we are processing your personal information.

### **Our Lawful basis for processing your information**

Delivery of early help to families is not a statutory requirement by law and therefore you will always have a choice whether you wish to receive early help. Your practitioner will discuss this choice with you from the outset to help you decide whether to work with early help services.

If you agree to receive early help, we will collect and use your personal information to comply with our legal obligations and to carry out tasks in the public interest. Within this, you will be asked explicitly whether you consent for a practitioner to share your information at a Community Action Partnership Panel, should the practitioner feel this is helpful.

We also have lawful basis for processing information for families who receive early help under:

- The Children Act 2004, section 11, which places a duty on all organisations within the Early Help Partnership to share information to promote the wellbeing and safeguarding of children.
- Statutory guidance Working Together to Safeguard Children 2018, points 23-27, which recommends that effective sharing of information between practitioners at an early stage is essential to keep children safe.

In accordance with the Children Act 2004, if at any point in early help work it is believed a child is at risk of significant harm information will be shared with LBH Children's Safeguarding and Specialist Services in order to safeguard the child.

If the information you provide us contains special category data, such as health, religious or ethnic information the legal basis we rely on to process remains as above.

### **Why we need your information (purposes of processing)**

We need your information to use it for the following purposes:

- To ensure appropriate, timely and safe support is provided to you and your family
- To ensure all practitioners working with you are up-to-date with your situation, preventing you from having to repeat the same information over again to different services and making your experience of support smoother
- To monitor and evaluate the quality and effectiveness of services we deliver to families
- To plan for continuous improvement of services into the future

### **Who your information may be shared with (internally and externally)**

We share your information with:

- Any practitioner within the Early Help Partnership that is working with you directly as part of your Team Around the Family
- Any practitioner within the Early Help Partnership that is providing support to you indirectly – e.g. providing advice and guidance to practitioners you are working with to help them deliver the best service to you
- LBH Early Help Hub, who are responsible for co-ordinating early help delivery in the borough and require access to information to undertake their role
- Community Action Partnership Panels, where your practitioner has discussed with you that they would like to seek support from the Panel in how best to help you
- LBH Children's Data Team, who will support with collating, processing and analysing the data

We will strive to ensure that any personal data in our care will be kept safe and that where your information is disclosed to a third party working on our behalf, we will seek to ensure that they have sufficient systems and procedures in place to prevent the loss or damage of personal data.

## **How long we keep your information**

We will keep information for a minimum period of between 3 and 10 years depending on the nature of our work with you. This is in accordance with the LBH Children's Services retention schedule:

[http://intranet.hounslow.gov.uk/chas\\_retention\\_schedule\\_electronic\\_paper\\_records\\_oct18.pdf](http://intranet.hounslow.gov.uk/chas_retention_schedule_electronic_paper_records_oct18.pdf)

We will then dispose your information in the most secure manner possible.

## **Transfers to third countries**

All the information you provide us is held within the European Economic Area

## **Data Matching and Auditing**

We are required by law to protect the public funds we administer. We may use the information you provide to us for the prevention and detection of crime. We may also share this information with other bodies that are responsible for auditing or administering public funds including the Audit Commission, the Department for Work and Pensions, other local authorities, HM Revenue and Customers and the Police.

The council uses data matching as a way of processing large volumes of information. While this can be a useful way of detecting fraud, it also enables us to identify information that is inaccurate or out of date, helping us comply with Data Protection law, while improving service provision.

In addition to undertaking our own data matching to identify errors and potential frauds, we are required to take part in national data matching exercises undertaken by the Audit Commission. The use of data by the Audit Commission in a data matching exercise is carried out under its powers in Part 2A of the Audit Commission Act 1998. It does not require the consent of the individuals concerned.

## **Your data protection rights**

The rights available to you depend on our reason for processing your information. For further information about your data protection rights and how to make a request, please see '[Your rights](#)'

## **Your right to make a complaint**

The Council tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

If you want to make a complaint you can contact us on:

Complaints Team  
London Borough of Hounslow  
Civic Centre  
Lampton Road  
TW3 4DN

## **Data Protection Officer**

The Council's Data Protection Officer can be contacted on:

[InformationGovernance@hounslow.gov.uk](mailto:InformationGovernance@hounslow.gov.uk)

Information Governance Team  
London Borough of Hounslow Civic Centre  
Lampton Road  
Hounslow  
TW3 4DN

## **Information Commissioner's Office**

The Information Commissioner is the UK's independent body set up to uphold information rights.

If you would like to know more about your rights under the Data Protection law, and what you should expect, visit the Information Commissioner's website: <https://ico.org.uk/>

If you have any concerns regarding any privacy practices or about exercising your Data Protection rights, you may contact the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow Cheshire  
SK9 5AF

Telephone: 0303 123 1113 or 01625 545 745

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

A full list of what information we control and process and for what purposes is set out in our notification with the Information Commissioner's Register of Data Controllers. Our registration number is Z5761176. You can view our registration on the Information Commissioner's website.