

PRIVACY NOTICE – CHILDREN’S SOCIAL CARE

The London Borough of Hounslow 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 CHILDREN’S SOCIAL CARE and tells you what we 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 020 8583 2000 or childrens.services@hounslow.gov.uk. The privacy notice will continue to be monitored and updated. You are advised to check this page from time to time.

Children’s Social Care
London Borough of Hounslow
Hounslow House,
7 Bath Road,
Hounslow, TW3 3EB

What type of information we have

We currently collect and process the following personal information:

- Name of child - and parent/carer and other family members, if required
- Address of child, parent/carer - and other family members, if required
- Date of birth of child - and parent/carer and other family members, if required
- NHS Number of child - and parent/carer if required
- National insurance number of parent/carer, if required
- ID of parent/carer, if required
- Unique pupil number of child
- Telephone number of child, parent/carer - and other family members, if required
- Email address of child and parent/carer - and other family members, if required
- GP details of child - and of parent/carer, if required

As well as personal information where applicable, we may collect and share additional information known as ‘Special Categories of Personal Data’ where appropriate including:

- Gender of child, and parent/carer - and other family members, if required
- Nationality of child - and parent/carer and other family members, if required
- Ethnic origin of child - and parent/carer and other family members, if required
- Religion of child - and parent/carer and other family members, if required
- Health data of child - and parent/carer if required
- Sexual orientation of child, if required

How do we get your information?

Most of the personal information we process is provided to us directly by a young person or by a child or young person’s parent, carer or representative.

We may also receive personal information indirectly from:

- Health professionals such as General Practitioners and those providing therapeutic or medical care.
- Other Hounslow Council teams within Children's Social Care and other departments, such as Housing, Benefits and teams working within Hounslow providing educational services
- Carers, advocates, and family members
- Members of the public who make a referral to us
- Schools and Academies
- Government Bodies such as the Department for Health & Social Care
- Other Local Authorities

We only process information from the above if it is required for us to carry out statutory functions for which we are legally responsible for.

Our Lawful basis for processing your information

The lawful basis we rely on for processing this information is

- Legal obligation – so that we comply with a common law or statutory obligation.
- Public task – so that we may perform a task in the public interest or for an official function, and the task or function has a clear basis in law,

The above lawful bases require legal justification, the team relies on the following:

- The Children Act 2004
- The Children Act 1989
- The Education Act 2011
- The Health and Social Care Act 2012
- Immigration and Asylum Act 1999
- Mental Health Act 1983
- The Social Security (Emergency Funds) (Amendment) Regulations 2017

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 is

- Health or social care purposes – for the provision of health or social care or treatment and for social support services

Why we need your information (purposes of processing)

The personal data we collect will be used for the following purposes:

- To carry out an assessment of social or health needs, which meet all of our legal and statutory duties including, but not limited to, those which apply under The Children Act 1989, The Children Act 2004, the Education Act 2011 and the Health and Social Care Act 2012
- To assist planning and decision-making through the use of internal and local multi-agency panels, such as the Education, Health and Care Plans Panel and Early Years SEND (Special Educational Needs and Disabilities) Panel, to review and make recommendations on access to funding, services, provision and/or resources based upon assessed need.
- To allow us to communicate and provide services appropriate to assessed needs, these may include, but are not limited to:

- Child and family assessment
 - Early Years Support
 - Access to funds, including for those individuals who are not entitled to public funds
 - Child protection concerns
 - Children's Centre Service delivery
 - Professional's Referrals
 - Placement planning
 - Adoption and Fostering services
 - Residential Services
 - Youth Offending Services
 - Leaving Care Support
- To gather information which informs planning and service delivery decisions
 - Where we are legally obliged, to undertake data processing prevention and/or detection of fraud and crime
 - To process financial transactions or where the council is acting on behalf of other government bodies such as the Department for Work and Pensions, the Department of Education, the Department of Health and Social Care and the Ministry for Housing, Communities and Local Government
 - Where necessary, to safeguard and protect people from harm or injury
 - To conduct research or statistical analysis that allows us to target and plan the provision of services for adults, young people and those participating in programmes such as Supporting Families
 - To identify residents/users for notifying them of proposed or planned changes to services that may affect them
 - To assist the council in responding to emergencies or major incidents. This allows the council, in conjunction with the emergency services, to identify citizens who may need additional support
 - Issuing of licenses e.g. Children in the media (TV, theatre etc.)
 - **Who your information may be shared with (internally and externally)**

When it is necessary, we may share your information with:

- NHS England – General Practitioners and other health professionals, including hospitals, ambulance services and mental health trusts
- Commissioned Providers of care such as Hounslow and Richmond Community Health Care Trust
- Community enterprises that offer voluntary or commissioned services that support the care you need or activities that support wellbeing
- Other commissioned services such as transport providers to enable children and young people to be transported to educational establishments, day service provision and commissioned activity sessions
- Organisations that assist with the provision of any support you receive, including any financial assistance you may be entitled to, for example payment/prepayment card providers
- Social Finance – an external organisation commissioned by the Council to conduct research and recommendation development for a YSEG project called SEND Pathways
- Internal departments within the London Borough of Hounslow, such as Housing, Finance, Adult Social Care, Public Health, internal youth support services or departments
- Government Bodies such as the Department of Health and Social Care

- Ministry of Justice agencies including HM Courts and Tribunal Service and HM Probation Service
- Commissioned or voluntary youth support services
- Schools and academies
- Other Local Authorities (for example, Children and Adult Social Care, and Education Departments)
- The Metropolitan Police or other Police services
- London Fire Brigade and other Fire Services
- Family members, carers and advocates

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 keep records containing personal information for specific periods depending on the type of record – these can be found in Appendix A of this document

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

Business Intelligence, Profiling and Analysis

We may analyze your personal information to improve the council's services for the following purposes:

- undertake statutory functions efficiently and effectively
- service planning by understanding your needs and your community's needs and to provide the services that you or your community request
- understanding what we can do for you and your community and inform you of other relevant services and benefits
- help us to build up a picture of how we are performing at delivering services to you and what services the people of Hounslow need
- analysis of costs and spend of services we provide so that we can ensure better and efficient use of public funds

The council is committed to using pseudonymised or anonymised information where practical, and in many cases this will be the default position.

Pseudonymisation is a procedure by which the most identifying fields within a data record are replaced by one or more artificial identifiers, or pseudonyms. There can be a single pseudonym for a collection of replaced fields or a pseudonym per replaced field. An example of this is your National Insurance number or Council Tax Reference number.

Anonymisation is the process of removing identifying particulars or details. This means that the data cannot be linked back to identify you.

Data Matching

We are required by law to protect the public funds we administer.

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.

The National Data Opt Out

The National Data Opt Out was introduced on 25 May 2018 to allow you to opt out from the use of your data for anything other than your individual care and treatment. This will prevent it being used for research or planning purposes as listed above. The opt out is in line with the recommendations of the National Data Guardian in the [Review of Data Security, Consent and Opt-outs](#).

The national data opt out applies to the NHS and some of the activities of the council. The following link provides further information for you and details about how you can opt out if you choose to do so - [The National Data Opt-Out | The National Data Opt-Out | London Borough of Hounslow](#)

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 as follows:

Complaints Team
London Borough of Hounslow
Hounslow House,
7 Bath Road,
TW3 3EB

Email: complaints.crt@hounslow.gov.uk

Telephone 020 8583 5211

Data Protection Officer

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

InformationGovernance@hounslow.gov.uk

Information Governance Team
London Borough of Hounslow
Hounslow House, 7 Bath Road, TW3 3EB

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

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.

APPENDIX A - RECORDS RETENTION SCHEDULE : CHILDRENS SOCIAL CARE

Ref No	Records Description	Retention Period	Trigger	Legal Basis for Retention or Justification	Action at the End of Retention Period	Contains Personal Information (Y/N)	Protective Marking
CSC001	First Contact - No further action	3 years	From closure - following action such as signposting or providing advice and information	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)
CSC002	LADO (Local Authority Designated Officer) - Contacts, Initial Considerations and Referrals that do not Progress	10 years	From date of closure. All information should be deleted or removed, unless at that point the LADO is able to rationalise why the information should be retained.	The National LADO Network	Secure Disposal	Yes	Official Sensitive (Personal)
CSC003	LADO - Malicious, False or Unfounded	10 years	From date of closure. If no additional information or evidence is brought to light during this period, the information should be deleted or removed. A decision to retain information beyond 10 years may be taken by the LADO if other patterns of behaviour emerge after the allegation was made that suggest that the person may pose a risk of harm.	The National LADO Network	Secure Disposal	Yes	Official Sensitive (Personal)
CSC004	LADO - All cases that progress to strategy meeting whereby the allegation is found to be unsubstantiated.	100 years	From date of birth of alleged perpetrator. Following this time they should be deleted and destroyed. For cases that are deemed unsubstantiated there is neither evidence to confirm or deny the alleged incident happened and therefore the risk in deleting this information is too high to do so sooner.	The National LADO Network	Secure Disposal	Yes	Official Sensitive (Personal)
CSC005	LADO - All cases that progress to strategy meeting whereby the outcome is found to be substantiated.	100 years	From date of birth of alleged perpetrator. Substantiated cases should not be deleted or removed sooner than this time as the outcome suggests the person poses risk of harm to children and the information should remain. This allows for allegations that may be made once the person has died.	The National LADO Network	Secure Disposal	Yes	Official Sensitive (Personal)
CSC006	Early Help Module	6 years	From date of case closure	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)
CSC007	Contact or Referral leading to Assessment	6 years	From date of case closure	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)

Ref No	Records Description	Retention Period	Trigger	Legal Basis for Retention or Justification	Action at the End of Retention Period	Contains Personal Information (Y/N)	Protective Marking
CSC008	Child in Need Plan - where the child has not been adopted or subject to a Child Protection Order	25 years	From child's DOB	Limitation Act 1980	Secure Disposal		Official Sensitive (Personal)
CSC009	Section 47 Investigation - leading to no further action	6 years	From date of case closure	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)
CSC010	Child Protection Plan Conference - resulting in no plan	6 years	From date of case closure	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)
CSC011	Child Protection Plan Conference - resulting in Child Protection Plan (including externally managed Child Protection episodes / other local authority Child Protection Plans)	40 years	From child's DOB	Arrangements for the Placement of Children (General) Regulations 1991	Secure Disposal	Yes	Official Sensitive (Personal)
CSC012	Child Protection Order	75 years	From child's DOB	Arrangements for the Placement of Children (General) Regulations 1991	Secure Disposal	Yes	Official Sensitive (Personal)
CSC013	Looked After Children - Records relating to the application for and implementation of a Care Order	75 years	From date of Order	Children's Homes Regulations 2001 reg. 28	Secure Disposal	Yes	Official Sensitive (Personal)
CSC014	Looked After Children - All records relating to the creation and maintenance of Care Plans	75 years	From child's DOB	Children Act 1989	Secure Disposal	Yes	Official Sensitive (Personal)
CSC015	Looked After Children - Educational Support	75 years	From child's DOB	Arrangements for the Placement of Children (General) Regulations 1991	Secure Disposal	Yes	Official Sensitive (Personal)
CSC016	Looked After Children - Provision of respite care	75 years	From child's DOB	Arrangements for the Placement of Children (General) Regulations 1991	Secure Disposal	Yes	Official Sensitive (Personal)
CSC017	Looked After Children - Support for Young People leaving care	75 years	From child's DOB	Arrangements for the Placement of Children (General) Regulations 1991	Secure Disposal	Yes	Official Sensitive (Personal)
CSC018	Looked After Children - Supported employment	75 years	From child's DOB	The Children (Leaving Care) Act 2000	Secure Disposal	Yes	Official Sensitive (Personal)
CSC019	Looked After Children - Register of Children in the care of the Local Authority	Permanent	N/A	(Leaving Care) Act	N/A	Yes	Official Sensitive (Personal)
CSC020	Fostering - records relating to the provision of foster care places by the local authority	75 years	From child's DOB	Arrangements for the Placement of Children (General) Regulations 1991	Secure Disposal	Yes	Official Sensitive (Personal)
CSC021	Fostering - records related to foster parents approved by local authority - including any person with whom a child is placed (under Regulation 34 or 38 of the Fostering Services Regulations 2002) and records of foster parent applicants who are not approved.	75 years	From last date with foster carer	Fostering Services (England) Regulations 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC022	Fostering - records related to private foster care: Children fostered by private arrangement supervised by local authority	75 years	From date of birth of the foster parent(s)	The Children (Private Arrangements for Fostering) Regulations 2005; Children Act 2004 section 44	Secure Disposal	Yes	Official Sensitive (Personal)
CSC023	Adoption - records relating to the management of the adoption process	100 years	From date of Adoption Order	Disclosure of Adoption Information (Post-Commencement Adoptions) Regulations 2005	Secure Disposal	Yes	Official Sensitive (Personal)
CSC024	Adoption - Adoptive Parents Including both Hounslow Adoption Service placements and non-agency placements (Step-parent adoptions)	100 years	From date of Adoption Order	The Adoption Agencies (Panel and Consequential Amendments) Regulations 2012	Secure Disposal	Yes	Official Sensitive (Personal)

Ref No	Records Description	Retention Period	Trigger	Legal Basis for Retention or Justification	Action at the End of Retention Period	Contains Personal Information (Y/N)	Protective Marking
CSC025	Local Safeguarding Child Practice Reviews (LSCPR)	50 years	After completion of the LSCPR Report or the decision not to proceed with the LSCPR	No statutory requirement to retain. Business justification: Discussed with Partners at the SE sub-group and subsequently with the National Panel, who advised it was up to each LA to determine their own retention period. LBH have decided to retain for 50 years to allow adults to obtain records of their review if they wish. In the event of a review following a child death, the retention period will allow family members to obtain records of their child or sibling's review at a later stage.	Secure Disposal	Yes	Official Sensitive (Personal)
CSC026	Residential care for children & young people - records relating to the administration of residential care for children and young people (excluding the register, client records, personnel records and any other records relating to named individuals)	15 years	From creation of record	Children's Homes Regulations 2001 reg. 29	Secure Disposal	Yes	Official Sensitive (Personal)
CSC027	Residential care for children & young people - Personnel records relating to the employees working in Children's Homes	15 years	From creation of record	Children's Homes Regulations 2001 reg. 29	Secure Disposal	Yes	Official Sensitive (Personal)
CSC028	Residential care for children & young people - records relating to children who are resident in local authority Children's Homes	75 years	From child's DOB	Children's Homes Regulations 2001 reg. 29	Secure Disposal	Yes	Official Sensitive (Personal)
CSC029	Residential care for children & young people - Register of admissions to local authority Children's Homes	75 years	From creation of record	Children's Homes Regulations 2001 reg. 29	Secure Disposal	Yes	Official Sensitive (Personal)
CSC030	Young Carers Support - Records relating to the support of young carers and their families	6 years	From date of last contact	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)
CSC031	Children's Centres - records relating to those attending and using the services provided	6 years	From date of last contact - then retained on child's social services record for the remainder of their case	Limitation Act 1980 (S2)	Secure Disposal	Yes	Official Sensitive (Personal)
CSC032	Children's Centres - records relating to the financial management of Children's Centres	6 years	From date of last contact - then retained on child's social services record for the remainder of their case	HMRC – Compliance Handbook Manual CH15400	Secure Disposal	Yes	Official Sensitive (Personal)
CSC033	Children with long-term disability - Assessment, Support & provision of specialist equipment	10 years	From date of case closure	HRMC Compliance Handbook Manual CH15400	Secure Disposal	Yes	Official Sensitive (Personal)
CSC034	Youth Offending Team - Offender records: Prevention Programmes - Stage 1	12 months	On completion of the Prevention Programme, reduce non-YOT information to basic information holding. Save YOT specific information for 12 months	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC035	Youth Offending Team - Offender records: Prevention Programmes - Stages 2 & 3	12 months	On completion of the 12 month period delete and dispose	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)

Ref No	Records Description	Retention Period	Trigger	Legal Basis for Retention or Justification	Action at the End of Retention Period	Contains Personal Information (Y/N)	Protective Marking
CSC036	Youth Offending Team - Offender Records: Pre-Court Decisions, Reprimands, Final Warnings - Stage 1	12 months	On the giving of the reprimand / final warning or completion of the final warning intervention, reduce non-YOT information to basic information holding. Retain YOT specific information for 12 months.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC037	Youth Offending Team - Offender Records: Pre-Court Decisions, Reprimands, Final Warnings - Stage 2	12 months	On completion of the 12 months delete and dispose of YOT specific information (while recording last caseworker and outcome of last contract with YOT and last risk status). Retain basic information holding.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC038	Youth Offending Team - Offender Records: Pre-Court Decisions, Reprimands, Final Warnings - Stage 3	3 years or 18th birthday	At the end of 3 years or where the young person reaches the age of 18 years (whichever occurs first) delete and dispose of all.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC039	Youth Offending Team - Offender Records: Referral Orders and Sentences of Court - Stage 1	3 years	On completion of the order reduce YOT information to basic information holding. Retain YOT specific information for 3 years.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC040	Youth Offending Team - Offender Records: Referral Orders and Sentences of Court - Stage 2	3 years	On the expiry of 3 years delete and dispose of YOT specific information (while recording last caseworker and outcome of last contact with YOT and last risk status). Retain basic information holding.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC041	Youth Offending Team - Offender Records: Referral Orders and Sentences of Court - Stage 3	5 years	At the end of 5 years or when the young person reaches the age of 18 years (whichever occurs first) delete and dispose of all.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC042	Youth Offending Team - Sexual offences (Schedule 1, Sex Offenders Act 1997)	Section 53 (1) or a Section 53 (2) If sentence is 30 months or more, retain indefinitely	From date of sentence	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC043	Youth Offending Team - Offences on Sex Offenders Register	Subject to length of time on Register	Date of Register entry	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)

Ref No	Records Description	Retention Period	Trigger	Legal Basis for Retention or Justification	Action at the End of Retention Period	Contains Personal Information (Y/N)	Protective Marking
CSC044	Youth Offending Team - Parent Case Records. (To be held in a separate file from that of the young person for whom they are responsible)		Information should be deleted on completion of the Parenting Order sanctioned by a court or on programme completion if non-court ordered. This is subject to YOT Manager discretionary override, e.g. if a child or young person of their family is an active case to YOT, such override to be documented.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)
CSC045	Youth Offending Team - Victim Records. (To be held in a separate file from that of the young person(s) who are responsible for their victimisation).		Information should be deleted from the YOT system on completion of the intervention/support with the victim.	Youth Justice Board Advice on Information Management in Youth Offending Teams (England) Jan 2011	Secure Disposal	Yes	Official Sensitive (Personal)