

PRIVACY NOTICE

SEND LOCAL OFFER – INFORMATION ABOUT SERVICES

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 the SEND Local Offer, which provides information about services, events, drop-in sessions and support available to children and young people (aged 0–25) with special educational needs or disabilities, as well as their families and professionals.

If you have any questions about this privacy notice or any concerns about how we process your data, please contact 020 8583 2000 or via email at thelocaloffer@hounslow.gov.uk or the postal address below. The privacy notice will continue to be monitored and updated. You are advised to check this page from time to time.

Education Department
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 for you, your child(ren) or child(ren) you are caring for:

- Name of child(ren), parent or carer
- Address of child(ren), parent or carer
- DOB of child(ren)
- Contact details of parent or carer
- Information about you, your child(ren) or child(ren) you are caring for
- Feedback, views or opinions

As well as personal information, where applicable and appropriate, we may collect and share additional information – about you and any child(ren) – known as ‘Special Categories of Personal Data’, including:

- Health data, including any special educational needs and any social, physical, emotional and mental health difficulties
- Gender
- Ethnicity

How do we get your information?

Most of the personal information we process is typically provided to us directly by you via email, feedback forms or via events or drop-in sessions, but we may also receive personal information indirectly from:

- Your family members, carers or representative, if applicable

- Teams within Hounslow Children's Social Care and other departments, such as Housing

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.

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

The lawful basis we rely on for processing this information is:

- Consent Article 6 (1) (a): the individual has given clear consent for you to process their personal data for a specific purpose.

You can withdraw your consent at any time by contacting us in person, by phone, or in writing, including email.

- Legal obligation Article 6 (1)(c) – so that we comply with a common law or statutory obligation.
- Public task Article 6 (1)(e) – 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

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

- Explicit consent Article 9(a) – the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- Health or social care purposes Article 9(h) – for the provision of health or social care or treatment and for social support services

The above lawful bases require legal justification, and the SEND Local Offer rely on the following:

- Children and Families Act 2014, Section 30(6)
- Special Educational Needs & Disabilities Code of Practice 2015
- The Special Educational Needs and Disability Regulations 2014, Part 4
- Equality Act 2010

Why we need your information (purposes of processing)

Our SEND Local Offer provides information and support for children and young people aged 0 to 25 years in Hounslow who have special educational needs and disabilities (SEND).

We want parents, carers, young people, and professionals to understand and feel confident about the educational, health and social care support available for children and young people with SEND.

One of our aims is to help families find other local organisations, initiatives and activities that might be interesting or helpful. We collect and process your personal information to ensure we can provide accurate, relevant, and up-to-date information as part of the SEND Local Offer.

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

- To respond to your enquiries for advice, information and support
- To seek – and respond to – your feedback so that we understand the needs and experiences of children with SEND and their parents/carers and – importantly – identify service gaps and barriers for underrepresented groups

- Improve and tailor the content and accessibility of the Local Offer to help us design and deliver services that are inclusive, accessible, and responsive to the needs of all our local communities
- Monitor and evaluate service use and effectiveness and ensure equity in service impact
- To produce statistics and reports to assess performance and set targets for service improvement, effective planning and resource allocation. We will ensure that statistics are used in such a way that individual children or young people cannot be identified from them.
- Support service planning and development
- Inform you about updates, local offer events and drop-in sessions, newsletters or changes, if you have requested this. You can opt out of these communications at any time by clicking on the 'unsubscribe' link in our emails or by contacting us at thelocaloffer@hounslow.gov.uk
- To determine the services and support that you may require

We only use your information where it is necessary for delivering public services, where you have given your consent, or where we are legally required to do so.

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

We may share your information with:

- Hounslow's SEN team
- Family Hubs & Children Centres
- Children's and Adult's Social Care on a need-to-know basis only

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, unlawful disclosure or damage of personal data.

How long we keep your information

We will keep the information for the following time period:

Records Description	Retention Period	Trigger	Legal Basis for Retention or Justification
SEND Local Offer: records relating to those filling out the feedback forms	3 Years	From date of last contact - then retained on child's social services record (if known to Children's Social Care and only if relevant) for the remainder of their case	Limitation Act 1980 (s2)
SEND Local Offer: Personal information given for events (this includes event registration and data shared at events)	3 Years	From date of event	Limitation Act 1980 (s2)
SEND Local Offer: Personal information provided for the purposes of requesting support, information and advice	3 years	From date of last contact	Limitation Act 1980 (s2)

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

Business Intelligence, Profiling and Analysis

We may analyse the personal information you provide to improve the council's services for the following purposes:

- Undertake statutory functions efficiently and effectively by seeking feedback on the provision of services and measuring outcomes
- Service planning by understanding residents' needs and providing the services that you request and for which you are eligible
- Help us to build up a picture of how we are performing at delivering services to you and what services the residents of Hounslow need
- Analysis of the costs and expenditure 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.

[Business Intelligence, Profiling and Analysis | Privacy notice | London Borough of Hounslow](#)

Data Matching and Auditing

We are required by law to protect the public funds we administer. We may use the information you provide 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 Department for Work and Pensions, other local authorities, HM Revenue and Customs 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.

As part of the council's fraud prevention and detection activities, the council participates in the National Fraud Initiative (NFI). The data matching exercise is run by the Cabinet Office.

You can find more information about this at

https://www.hounslow.gov.uk/info/20110/open_data_and_information_requests/1365/data_protection/5

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 all the 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
Hounslow House,
7 Bath Road,
TW3 3EB
E-mail: complaints.crt@hounslow.gov.uk

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: www.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

Our Data Protection registration number is Z5761176. You can view our registration on the Information Commissioner's website.