



Herts PCI CIC (HPCI) DATA PROTECTION AND PRIVACY POLICY

At Herts PCI CIC (hereafter referred to as HPCI) we want everyone who joins our parent carer network, requests information, attend events or becomes a parent representative to understand and feel comfortable about how any information shared with us will be looked after and used. This Policy explains the various ways we collect information and how we use and store it.

What is HPCI

HPCI PCI CIC Company No 10157697, is the parent carer forum for Hertfordshire. We work to make sure that local service providers know what families with children and young people with SEND need. We gather parent carer views and work in partnership to bring about positive change across health, education, and social care services.

We are a “data controller” for the purposes of the EU General Data Protection Regulation 2016/679 and The Data Protection Act 1998. This means that we are responsible for deciding what personal information we need to collect from you, how we store it and how we will use it.

We hope that the information set out in this document will give you a better understanding of what we do with your data, but if you have any questions please contact: HPCI Operations Lead, Kate Hudson HPCI Censeo House, 6 St Peter’s Street, St Albans AL1 3LF Phone: 07840 360245 Email: kate@hertsparentcarers.org.uk

Our Privacy Promise

We promise to:

- Keep your data safe, private and confidential.
- Not to sell your data.
- Not to share with third parties without your specific permission.

Information we collect

The personal information we may collect includes details such as:

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- your name
- address
- phone numbers
- email address
- ethnic group
- special needs of your children
- year of birth of your children
- care status of your children
- eligibility for free school meals
- if you and or your children receive support from social care
- if you are a lone parent
- if you have a disability

and in the case of parent representatives:

- your bank account number and sort code.

Why we use it:

We mainly use this information to do the following:

- Provide you with regular information about SEND (special educational needs and/or disabilities) services, events, support and developments local and national.
- Contact you about an HPCI event that you may be attending or have attended.
- To keep a record of your membership of HPCI.
- To invite you to take part in surveys run by HPCI or outside agencies which we think would be of interest to you.
- To ensure that we are fully representing the SEND population in Hertfordshire.
- Pay any expenses due to you as a parent representative.

How we collect information about you

We collect information about you to ensure we can contact and inform you in the most appropriate way. Information is also used to tailor the information and events HPCI offer so that they continue to meet the needs of our members and contacts.

We collect information in various ways:

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- When you join as a member and fill in the online or paper registration form.
- When you register to attend an event or focus group, via the website, by phone or by email.
- When you phone or email HPCI to ask us a question, request information, provide us with information or make a complaint.
- If you apply to be a parent representative.
- When we carry out surveys and you provide personal information as set out in the privacy statement in the survey.

Legal basis for using your data

As well as our Privacy Promise your privacy is protected by law.

Data protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When you positively consent to it, or
- When it is in our legitimate interest (A legitimate interest is when we have a business or commercial reason to use your information).

Special category data is personal data that is sensitive in nature and as a general rule explicit consent of the data subject is required to process it. This includes data about your ethnicity, health or genetic information.

We will process your data lawfully, fairly and in a transparent manner. We only collect the data we need for the purpose that we collect it and will take reasonable steps to ensure personal data is accurate and kept up to date.

Sharing your information

We will not share your information with a third party without your specific permission. Access to your personal data is limited to personnel within HPCI who need to access it to fulfil their role with appropriate security put in place to avoid unauthorised sharing of information.

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The exceptional circumstances that would lead to us sharing information without your consent would only be cases where we had to report our concerns about the safety of a child or vulnerable adult or we were legally required to provide information.

We also share limited information with our funders such as how many members we have, and their demographic representation, but this never includes your individual personal information.

Keeping your information safe

Your personal information will be retained by HPCI for as long as we have to by law. If there is no legal requirement, we will only store it for as long as we need it.

You should be aware that communications over the internet (such as emails) are not secure unless they have been encrypted. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We will keep all the personal information we gather about you until you decide you no longer want to be a member of HPCI or for six months after the date of an event you attended/registered for.

Most of the data is held securely on a database or on an HPCI SharePoint with restricted access. We also hold some of the information as paper records which are kept secure in a locked filing cabinet. Other forms of data that we hold are kept secure using password protection on files and laptops. The Directors and employees of HPCI are all trained so that they understand the importance of keeping your personal information secure and confidential and we have procedures in place to ensure the safe processing of your data.

The rights you have in respect of the information we hold and process

Under GDPR you have various rights in respect of the information we hold. These are listed below.

- **Access to your personal information:** You can access a copy of the information we hold about you, along with what information we use, why we use it, who we share it with and how long we keep it for. You can make this request free of charge by putting the request in writing and providing proof of your identity.
- **Right to Object:** If we are processing your personal information on the basis of a legitimate interest then you can object if there is a particular reason why you do not want us to do this.

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- **Consent:** If we are relying on your consent to use personal information (for example to send you emails about our services) then you can withdraw consent at any time.
- **Rectification:** You can ask us to change or complete any information about you if it is inaccurate or incomplete.
- **Erase:** You can ask us to delete your personal information where it is no longer appropriate for us to hold it.
- **Portability:** You can ask us to provide you with some of the personal information we hold about you in an electronic form so it can be easily transferred.
- **Restriction:** You can ask us to stop processing your data while we are acting on a request from you to delete your data or if you have objected to us processing it.
- **No automated decision making:** You also have the right to object to automated decision making in certain circumstances. We don't carry out any automated decision making so we won't list the details of this right.

If you want to make any of the above requests then please contact our responsible person, Kate Hudson Kate@hertsparentcarers.org.uk or by phone on 07840 360245. If you are asking for us to provide you with copies of the data we hold about you, either in paper form or electronically, then we will need the request in writing, and you will need to verify your identity.

Keeping your information confidential

HPCI expects that Directors, Employees and Parent Reps will be aware, at all times, about the confidentiality of information gained by them during the course of their duties and will treat your information in a discreet and confidential manner. HPCI provides GDPR training to all our people to help ensure your data is processed lawfully and in line with our duties.

You can be confident that:

- Written records, including computerised information and correspondence, will be kept securely at all times when not being used by an authorised person.
- Information received from Hertfordshire County Council, NHS Hertfordshire, and other organisations, will be kept confidential to within the HPCI Board when requested to do so.
- Conversations relating to confidential matters will not take place in situations where they may be overheard.

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- Information of a personal nature gained as part of a trusting relationship with other parent carers will not be shared without the express permission of that person.
- Any breach of confidentiality may be regarded as misconduct and be the subject of serious action e.g., termination of membership of HPCI.

If you want to make a complaint about our use of your data, then please contact HPCI using the contact details as stated on the previous page.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, HPCI shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioners Office.

This policy was approved at a meeting of Herts PCI CIC Board

Recorded in the Minutes of the Board Meeting held on:

June 2025

Frequency of Policy review:

Every three years

Review of this Policy due:

June 2028