

AllChild Privacy Policy

Updated October 2025

This is the Privacy Policy for AllChild, a company limited by guarantee and registered in England and Wales under number 08991196 with registered charity number 1160947 whose registered office is at 140-144 Freston Road, London W10 6TR.

AllChild is the Data Controller for your information and this Privacy Policy sets out the basis on which any personal data we collect from or about you or that you provide to us will be processed by us.

We have a Data Protection Officer (DPO) who is responsible for overseeing our data protection practices and can be contacted at the following email address: dpo@allchild.org. If you have any questions or queries about this Policy you can contact us at dpo@allchild.org or call 0207 998 4044.

OUR DATA PRINCIPLES

At AllChild, we have a number of data principles:

1. We do our very best to protect your privacy by using security technology appropriately.
2. We will respect your privacy.
3. We collect and use data only if we have a lawful basis to do so.
4. We will be clear in our communications and dealings with you as to what information we collect and how we use it.
5. We will use personal and special categories of data only for the stated purposes for which it was collected and we will make sure we delete it securely.
6. If we transfer any information out of the UK, it will only be done with the relevant protection (stated under UK law) being in place.

WHAT INFORMATION WE COLLECT

All Child collects data in the following formats:

- Written (paper) and electronic media (including Word, Excel and pdf files)
- Photographs
- Video
- Sound recordings

REGARDING CHILDREN AND THEIR FAMILIES

The data we will collect and use about AllChild cohort children and/or their families mainly includes the following information:

- Name
- Date of birth
- Gender
- Ethnicity
- Postcode
- Pupil Premium
- UPN (Unique Pupil Number)
- School data including attendance, attainment, records of fixed term exclusions, and behaviour records
- Access to services
- AllChild My Voice Survey or Strengths and Difficulties Questionnaire data (our survey undertaken by children, parents or teachers that focuses on wellbeing which we use to

help to identify children who could benefit from support, and from which we measure progress)

- Assessments of progress from our partner services (on attendance, academic progress or wellbeing)
- Medical and Special Education Needs and Disability information

We also record the contents of conversations we hold with children and young people that we work with.

We also collect data on children in the schools where we work who are not on our Cohorts in order to support our Cohort identification, to use for benchmarking purposes, and for monitoring equality of opportunities. This data is pseudonymised, such that we never have access to names or addresses. This data mainly includes:

- UPN
- School data including attendance, attainment, records of fixed term exclusions, and behaviour records
- Pupil Premium status
- Access to services
- Special Educational Needs information
- Borough of residence
- Ethnicity

AllChild also collects information about children, young people and their families' engagement with services offered by Brent Council. This is collected in order to better understand the a) histories of children we work with and b) the long-term impact we have, e.g. preventing re-engagement with council services. This processing is carried out in line with the specification which is for a targeted early intervention service in schools for individual children who exhibit risk factors indicating poor outcomes later in life by linking children and young people to a range of support services. Data may not be available at the individual child level.

This data includes:

- History of parental engagement with council services.

Please note that the information collected is not always at a child level basis.

REGARDING OTHER DATA SUBJECTS

AllChild also collects information on individuals and organisations that may enter into a funding relationship with us, or perform contract or consultancy work with or for us. Information collected on these individuals and organisations may include:

- Name
- Position
- Phone number
- Email
- Work address
- Donations and funding amounts
- Any notes from meetings held with individuals or representatives from these organisations.

AllChild also collects information about Delivery Partners' facilitators delivering activities with children. This data mainly includes:

- Name
- Safer recruitment related information (eg. information about criminal convictions and offences)
- Safeguarding related information.

AllChild also collects information about employees and job applicants ("Job applicant data") at the recruitment stage and during the course of the application process. Job applicant data is collected through online applications submitted via the Talos platform, or through third party recruitment agencies. This data mainly includes:

- Name
- Address
- Telephone number
- Email address
- Previous employment details;
- Education details
- Reference details
- Any information provided by applicants during interviews
- Information required for equality and diversity monitoring (such as race or ethnicity, religious beliefs, sexual orientation and/or your health, including any disability and/or medical condition);
- Information about criminal convictions and offences.

Please note that the information collected in the equality and diversity monitoring section does not form part of the assessment of applications.

How do we collect information

AllChild collects, stores and uses data listed above in multiple manners.

We receive personal information indirectly from the following sources:

- Our partner schools to deliver the right support to children and young people;
- Our Delivery Partners while carrying out their activities in support of the children;
- Local Authorities in relation to children's experiences/parental engagement with their services.

We receive personal information directly from you. For example:

- Information about children and young people from their parents/guardians;
- Information about donors/funders;
- Information about employees and job applicants when they fill in the online application form.

How we use the information we collect

REGARDING CHILDREN AND THEIR FAMILIES

The majority of our data collection and processing relates to the delivery of support for children and young people in our partner schools.

We work in partnership with others (including the organisations we list below in the section on data sharing) to identify and understand proxy indicators of educational success of children and young people, and we then provide services to those identified as in need of support (the AllChild cohort).

We collect and process this information for a number of reasons:

- To identify what support we will ask the charities we work with to provide to children in our AllChild cohort and to tell them the information they need to do this effectively;
- To better understand the needs of each child and develop bespoke programmes of support for the child;
- To check on children's progress whilst they are taking part in the support;
- To understand how children's progress compares to benchmarks;
- To ensure the safety of children attending educational trips and visits;
- To find out what children go on to do when they leave the support (e.g. attend school/college/training) so that we can try to understand whether we helped the child to achieve what they want in life;
- To secure funding to enable AllChild to carry out its activities;
- For research to look at which activities were successful and to assist in developing future support.

REGARDING OTHER DATA SUBJECTS

We collect personal information for some other purposes as well. These include:

- Job applicant data is collected for recruitment purposes including to assess skills and suitability for the relevant role within the organisation;
- Employees data is collected for the performance of the employment contract;
- To perform our duties as an employer;
- Facilitators' data is collected for safer recruitment and safeguarding reasons;
- To identify individuals and organisations that may enter a funding relationship with us, or perform contract or consultancy work with or for us;
- To administer the work of our charity.

SHARING DATA

AllChild will always share data in a secure manner, ensuring that it is kept safe and only those authorised to view it may do so. We have in place data sharing agreements to ensure that data is dealt with properly by those who receive it.

REGARDING CHILDREN AND THEIR FAMILIES

As part of our work with children and families, we need to share information on our AllChild cohort of children with other organisations who work with us to provide opportunities to our cohort. These include:

- The schools we work with;
- Consultants who may do work for us;
- Our delivery partners (the charities that provide specialist support and interventions to the children);
- London Borough Councils (the London Borough of Hammersmith and Fulham, the London Borough of Kensington and Chelsea, the London Borough of Brent and the City of Westminster);
- the Borough Council of Wigan in Manchester.

Data is also shared with the relevant Borough Councils to demonstrate successful outcomes: we do this to enable us to receive funding for our work.

There may be some occasions where we have to tell other organisations information about our cohort. We do this if there is any risk to a child's safety or welfare, or if we are legally required to provide the information. Where possible we tell cohort families and get their consent, but we may not always be able to do that.

REGARDING OTHER DATA SUBJECTS

In the case of facilitators', we may share their data with the school for safer recruitment and safeguarding reasons.

In the case of Job applicant data, we may share this data internally for recruitment purposes and from time to time with external third parties that provide services to us in terms of recruitment and vetting requirements (e.g. DBS checks) once we have made an offer for employment.

In the case of employees, we may share employee personal data with trusted third parties, such as payroll providers, pension schemes, occupational health services, and regulatory bodies, where necessary for the performance of the employment contract, compliance with legal obligations, or our legitimate interests as an employer.

LEGAL BASIS FOR HOLDING AND DATA PROCESSING

We need to have a lawful basis to use the information we collect for the ways in which we want to use it. These are the bases we rely upon.

REGARDING PROCESSING INFORMATION ON CHILDREN AND YOUNG PEOPLE

The processing and sharing of the children's personal data relies on the basis of the performance of a task carried out in the public interest (art. 6(1)(e) of the UK GDPR) and in some circumstances on the basis of legitimate interest (Article 6(1)(f) of the UK GDPR) or for compliance with a legal obligation (Article 6(1)(c) of the UK GDPR).

The processing and sharing of the children's Special Categories of Personal Data rely on a joint basis of the performance of a task carried out in the public interest (art. 6(1)(e) of the UK GDPR) and reasons of substantial public interest (art. 9(2)(g) of the UK GDPR) such as for the provision of

confidential counselling, advice or support or of another similar service provided confidentially (para 17 of Part 2 of Schedule 1 of the DPA18) and/or for safeguarding of children and of individuals at risk (para 18 of Part 2 of Schedule 1 of the DPA18).

Instead, the sharing of the personal data, including special categories of personal data, between the AllChild and Delivery Partners rely on consent (art. 6(1)(a) and art. 9(2)(a) of the UK GDPR) given by the parents or legal guardians of the children.

In specific circumstances and when possible, we request parents/legal guardians to authorise the processing of their children's personal data, including - if necessary - special categories of personal data (such as at special events/visits) by signing a specific consent form (art. 6(1)(a) and art. 9(2)(a) of the UK GDPR).

When we are doing our benchmarking work, we process the Personal Data on the basis of the legitimate interests condition – i.e. it is necessary for us to be able to demonstrate the impact of our work; we believe this is not outweighed by the privacy rights and expectations of the pupils or their parents/guardians (especially as we take steps to pseudonymise and/or anonymise the data when possible). Moreover, processing the Special Categories of Personal Data on the basis of the Research condition (para 4 of Part 1 of Schedule 1 of the DPA18, Article 9(2)(j) of the UK GDPR) implementing measures to pseudonymise and/or anonymise the data.

REGARDING PROCESSING INFORMATION ON CHILDREN'S EXPERIENCES WITH LOCAL BOROUGH SERVICES

AllChild processes information received from Brent Council on a joint basis of the performance of a task carried out in the public interest (art. 6(1)(e) of the UK GDPR) and reasons of substantial public interest (art. 9(2)(g) of the UK GDPR) such as for the provision of confidential counselling, advice or support or of another similar service provided confidentially (para 17 of Part 2 of Schedule 1 of the DPA18) and/or for safeguarding of children and of individuals at risk (para 18 of Part 2 of Schedule 1 of the DPA18).

REGARDING PROCESSING INFORMATION ON INDIVIDUALS AND ORGANISATIONS THAT MAY ENTER A FUNDING RELATIONSHIP WITH US OR PERFORM CONTRACT OR CONSULTANCY WORK WITH US

Information on individuals who may enter into funding or professional relationships with AllChild is processed on the basis of performance of a contract (art. 6(1)(b) of the UK GDPR) (e.g. where you sign up to receive communications from AllChild) or legitimate interest (i.e. it is necessary for AllChild to process the information in order to raise funds to run the organisation, or to make effective decisions about entering into professional arrangements with individuals).

REGARDING PROCESSING INFORMATION ON DELIVERY PARTNERS' FACILITATORS

Information on individuals who deliver activities with children is processed on the basis of performance of a contract (art. 6(1)(b) UK GDPR, under art. 6(1)(c) UK GDPR when processing is necessary for compliance with a legal obligation; and/or art. 6(1)(f) UK GDPR when processing is necessary for the purposes of legitimate interests. Under art. 10 UK GDPR when processing of personal data relating to criminal convictions and offences, the additional condition under the Data Protection Act 2018 is: Schedule 1, Part 1, Parag. 1 (processing is necessary for the purposes of employment and social security and social protection law); and/or Schedule 1, Part 2, Parag. 18 (safeguarding of children and individuals at risk).

REGARDING PROCESSING INFORMATION ON EMPLOYEES AND JOB APPLICANTS

AllChild processes information relating to employees job applicants for the following purposes:

- enabling us to carry out our recruitment process on legitimate interest basis (UK GDPR), art. 6(1)(f);
- enabling us to enter into a contract of employment (UK GDPR), art. 6(1)(b);
- enabling us to fulfil legal obligations and exercise our rights in respect of employment relating to special category data including criminal conviction data (UK GDPR art. 6(1)(c); UK GDPR art. 9(2)(b); UK GDPR art. 10; DPA 2018 Schedule 1, Part 1, Parag. 1–2);
- enabling us to monitor equal opportunities relating to special category data on ethnic origin, sexual orientation, health or religion or belief (UK GDPR art. 6(1)(f); UK GDPR art. 9(2)(g); DPA 2018 Schedule 1, Part 2, Parag. 8)

NEWSLETTER

When you sign up for our newsletter, we collect the following personal information:

- Name (First and Last Name);
- Email Address.

We use the information we collect to:

- Send you our newsletter and keep you updated with inspiring stories, news about our work, and ways you can help make a lasting difference;
- Respond to your inquiries;
- Improve the content of our communications;
- Comply with legal obligations.

The lawful basis we rely on for processing your personal data is your consent under article 6(1)(a) of the UK GDPR.

We do not sell, rent, or trade your personal information. However, we may share your information with trusted third-party service providers, such as Mailchimp. We use Mailchimp to send our newsletters and manage our subscriber list. By signing up for our newsletter, you acknowledge that your data will be transferred to Mailchimp, which may store your information outside of the UK, including in the United States.

We ensure that appropriate safeguards are in place to protect your data when it is transferred. In particular, Mailchimp is compliant with UK GDPR and has provided us with a Data Processing Agreement (DPA), ensuring that your data is handled in accordance with data protection laws.

We will retain your personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by law. If you no longer wish to receive our newsletter, you can unsubscribe at any time by clicking the "unsubscribe" link in any of our emails or by contacting us directly.

MEDIA

This section outlines the additional information relevant to the use of personal data for publicising the work of AllChild.

We may - as part of our work - take photographs, videos or other media of those with experience of our services for publicising the work of AllChild in:

- **Internal use** (e.g. staff presentations, intranet, internal bulletins, communications between AllChild and parents/legal guardian);
- **External presentations and printed materials** (e.g. leaflets, posters);
- **Online content** (e.g. AllChild website, email newsletters);
- **Media coverage** (e.g. local or national press, radio, TV);
- **Social media** (e.g. Facebook, Instagram, LinkedIn, YouTube).

Consent is the legal basis for this additional information collecting, processing and sharing (art. 6(1)(a) of the UK GDPR). Media relating to a child or another data subject will not be used or stored for any longer than 3 years and 5 years regarding internal purposes, unless the parent and/or child and/or data subject ask us to stop using it before then.

WHAT RETENTION DATA

AllChild will retain your data only as required or permitted under data protection law and while it has a legitimate purpose for doing so. Moreover, data will be kept in compliance with our data retention policy for the further protection of data subjects and in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

In particular, Job applicant data is retained for purposes of any future opportunities and the data collected before and during the recruitment process (e.g. interview notes, etc) will be retained by AllChild for up to a period of 6 months.

YOUR RIGHTS

AllChild adheres at all times to data protection legislation (currently the Data Protection Act 2018 and UK GDPR), which provides the following rights for individuals:

1. The right to be informed;
2. The right of access – see further detail below;
3. The right to rectification;
4. The right to erase, except for the processing of data based on public interest;
5. The right to restrict processing;
6. The right to data portability, where the legal basis for data processing is consent;
7. The right to object;
8. Rights in relation to automated decision making and profiling; please note that at the moment the data processing carried out by AllChild does not include automated decision-making and profiling.

This policy outlines our approach to ensuring these rights are met and maintained. If you have any concerns or questions relating to your rights regarding personal data, please contact our DPO.

WITHDRAWING CONSENT

Where we need your consent in order to process your personal data, you have the right to withdraw consent at any time.

To withdraw consent, please email dpo@allchild.org or call 0207 998 4044.

ACCESSING YOUR DATA

You have the right to access the data we hold on you at any time.

You do not have to pay to make an access request.

Requesting access to your data will not affect your relationship or your child's relationship with AllChild, your child's school, or any delivery partners.

We work with children from age 3 to age 18. Although very young children would not be considered 'competent' to exercise rights in relation to their data, some of the older children we work with can be considered 'competent' to exercise their rights, including to submit a Subject Access Request. Where this is the case:

- The child may request access to their information themselves;
- If a parent wishes to access the data that AllChild holds on their child, this would require authorisation from the child concerned.

AllChild typically considers children to be competent to exercise this right from the age of 13.

To make a data access or rectification request, please email dpo@allchild.org or call 0207 998 4044.

KEEPING YOUR INFORMATION SECURE

To prevent unauthorised access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, AllChild will take all reasonable and appropriate procedures to safeguard the information we collect and process. In particular, when transferring confidential or sensitive/ special category information we will protect it appropriately. These measures include encryption, password protection and secure storage.

SUPPLIERS

AllChild uses certain suppliers in the general running of its business and to assist it in providing its services. A supplier is a third party service provider (a Data Processor) engaged by AllChild, who has or potentially will have access to or process personal data. AllChild engages different types of suppliers to perform various functions as explained in the table below.

REGARDING CONTRACTUAL SAFEGUARDS

AllChild requires its suppliers to enter into agreements that satisfy the requirements of Article 28 UK GDPR, including but not limited to obligations to:

- process personal data in accordance with AllChild's documented instructions;
- ensure that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- not engage a subprocessor without prior specific or general written authorisation of AllChild and when engaging a subprocessor, impose the same data protection obligations as are in place between itself and AllChild;
- provide regular training in security and data protection to personnel to whom they grant access to personal data;
- implement and maintain appropriate technical and organisational measures to ensure the security, integrity and confidentiality of personal data;
- promptly inform AllChild about any actual or potential security breach; and
- cooperate with AllChild in order to deal with requests from AllChild's clients, data subjects or data protection authorities, as applicable.

REGARDING PROCESSING INFORMATION ON SUPPLIERS

The following is an up-to-date list (as at the date at the top of this policy) of the names of AllChild's key suppliers and the purposes for which they process personal data, as well as which clients these are potentially applicable to.

Entity Name	Entity Type	Purpose	Web Address
A Little Bit of HR	HR service consultants	HR advisory support and EDI training providers	https://www.alittlebitofhr.com/
Bramble	Cloud Service Provider	Online video conferencing, storage of recordings for safeguarding purposes	https://about.bramble.io/index.html
BreatheHR	Cloud Service Provider	AllChild staff HR management (policies, staff details, absence management)	https://www.breathehr.com/
CloudAlly	Cloud Service Provider	Cloud Service Provider that provides a backup service (backups which are encrypted and stored on a UK-based AWS server)	https://www.cloudally.com
CPOMS	Safe-guarding record database	Online safeguarding report platform to ensure AllChild carries out legal safeguarding duty. The CPOMS platform is recommended by the Department of Education	https://www.cpoms.co.uk/
Form Assembly	Data collection tool	Online forms to collect data from participants	https://www.formassembly.com/
Goodman Jones	Payroll service provider	Payroll processing services	http://www.goodmanjones.com/
ImpactBox	IT consultancy	Upgrading and maintaining AllChild's client relationship	https://impactbox.coop/

		management platform (Salesforce)	
Mailchimp	Third party service	Mailchimp helps AllChild deliver AllChild email newsletter, email campaigns and manage our subscriber list.	https://mailchimp.com/legal/terms/
Microsoft, Microsoft Outlook, Sharepoint and OneDrive	Cloud Service Provider	Email, Calendar and File Storage	https://www.microsoft.com
MyePayWindow	Cloud service provider	Online payroll portal	https://www.mypaywindow.com/
Renaissance	Cloud service provider	Online platform tools to improve AllChild monitoring and evaluation of high intensity academic partner programmes.	https://www.renlearn.co.uk/
Salesforce	Cloud Service Provider	Hosting service for AllChilds management information	https://www.salesforce.com

WHEN THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to all of the information dealt with by AllChild as a data controller.

This Privacy Policy does not provide information on the data management of other organisations, including those that we share data with. For more information on how any of the other organisations mentioned in this policy deal with personal data please read their privacy policies which should be accessible through their websites.

CONCERNS AND COMPLAINTS

If you have any concerns or a complaint regarding our collection and use of your data or a possible breach of your privacy, please email dpo@allchild.org.

We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

If you remain unhappy you have the right to complain to the Information Commissioner. You can find out more information about this at: www.ico.org.uk.

CHANGES TO THE PRIVACY POLICY

Should we elect to change our Privacy Policy, we will post the changes here. If we consider the changes are significant, we will contact you directly.