



CITY IN THE COMMUNITY

PRIVACY STATEMENT FOR PARENTS: PRIMARY STARS

At City in the Community (CITC), we collect and use personal information about everyone who takes part in our projects. This document explains what information we ask for on Primary Stars, why we ask for it, who has access to it, and how we use it. We act as a 'data processor' for this Primary Stars information.

What information do we ask for?

- When your child first takes part in our Primary Stars project at their school, we ask the school to give us the following personal information: your child's **first name** and **last name**; **gender** (male or female); **date of birth**; **postcode**; **ethnicity**; and **disability status** (disability or no disability). We also collect information about any **health or medical conditions** we may need to know about while your child takes part in Primary Stars.

We ask for this information about everyone who takes part in one of our projects, regardless of their age.

Why do we collect this information?

- So that we can tell the organisation that funds Primary Stars (this is the Premier League Charitable Foundation) about **how many children we work with**, **how often** we see them, and **how they benefit** from taking part in the project.
- So that we can be sure Primary Stars is **open to all children**, no matter who they are, where they live, or what background they come from.
- So that we can ensure the **safety and wellbeing** of all the children who take part in Primary Stars.

Where do we keep the information?

- Your child's personal information is **stored online on Views**, which is a secure, password protected and encrypted database that is provided by a company called Substance 2005 Limited. Passwords are only supplied to CITC staff who need access to the data as part of their job role, which means that this is strictly monitored.

Who will have access to it?

- Only CITC project staff, the Insights team at CITC who help us analyse our data, and certain staff at Substance 2005 Limited (but only with our written permission), will be able to **see your child's information**.
- All CITC staff have completed **mandatory GDPR training** provided by Manchester City FC. This covers their responsibilities around keeping personal information safe and secure, the reasons why this is important, and how to report any concerns they may have.

What do we do with the information we collect?

- We use personal information to help us **monitor, evaluate and improve** all our CITC projects. It helps us to report how many children we work with on Primary Stars, how often we see them, which local areas or communities they come from, and how they benefit from taking part.
- We only report **total or aggregate numbers** to our Primary Stars funders. We never report any child's individual personal information, or their attendance on the project.

Who do we share your child's information with?

- **We may share your child's information with their school** (for example, about their progress or development on Primary Stars).
- **We will not share their personal information with anyone else**, unless we must do this by law (for example, because of any safeguarding proceedings).

How long do we keep your child's information?

- We keep the information **for as long as your child takes part in Primary Stars, and for approximately three years afterwards**, in case they return to Primary Stars in the future, or move on to take part in any of the other projects that CITC runs.
- If it is **more than 12 months since we last saw your child**, we will archive their personal information. This means that we file it away securely in our database, in case they come back to CITC, but it is not anonymised or deleted at this point.
- If it is **more than three years since we last saw them**, we will anonymise their personal information. This means that we no longer know who the information relates to, but we are still able to report on how many children we have worked with in previous years, and their general background (for example, their gender and ethnicity).

What are your rights?

- You can **ask us for a copy** of the information we have about your child. You can also ask us to **correct** their personal information, or to **delete it** from our database if you are unhappy about us having it and using it in the ways we have explained above. If you would like to **complain** about how we handle your child's personal information, you can contact our Data Protection Officer.

To do any of these things, please email us at CITCGDPR@cityfootball.com, call us on 0161 438 7864, or write to CITC GDPR, Etihad Stadium, Etihad Campus M11 3FF.

- You also have the **right to complain** to the Information Commissioner's Office (ICO) at Wycliffe House, Water Lane, Wilmslow SK9 5AF.

We will update this document from time to time and provide a copy to your child's school. To see our full Privacy Policy go to www.mancity.com/news/community/general/2018/may/gdpr-update. This contains more detailed information about our collection, use and protection of personal information, as well as your rights in relation to this.

Last updated 30 November 2018

