



Privacy Policy and Privacy Notice 2025 Edition

Libra Children Services (LCS) is committed to protecting the privacy and rights of all individuals who share personal information with us. This policy explains how and why we collect personal data, how we use it, the lawful bases for processing, and the rights available to those whose information we hold.

This notice should be read alongside the LCS Information Security Policy.

1. Contact Details

General Enquiries

Email: admin@librachildrenservices.org.uk

Telephone: 0121 269 9879

Data Protection Queries

Email subject line: FAO Data Controller

LCS Data Controller reviews and responds to all requests under UK GDPR.

2. Information We Collect and Why

LCS gathers personal information so we can provide supervised contact services, safeguard children, communicate with families and professionals, and meet legal responsibilities. We only collect information that is relevant and necessary for these purposes.

Information we may collect when delivering services

- names, addresses and contact details
- dates of birth
- emergency contacts
- gender and pronoun preferences
- health and medical information, including allergies and known conditions

- assessments and information on care or support needs
- details relating to family circumstances and background
- safeguarding information, including risks and safety planning
- records of attendance and sessional activity
- information relating to complaints or compliments
- criminal offence information when relevant to safeguarding decisions

Special category data

We may also collect sensitive information such as

- racial or ethnic background
- health information

These categories are protected in law and are handled with additional safeguards.

Information for funding, donations or Gift Aid

- names and contact details
- taxpayer confirmation (where required for HMRC purposes)

Special category information is only collected where absolutely necessary and with enhanced protections.

Information we collect to meet legal requirements

- personal identity information
- safeguarding and child protection records
- information required for health and safety compliance
- records needed to comply with court directions

Information collected when managing concerns, complaints or claims

- witness statements
- previous case notes
- correspondence
- health and safety documentation
- safeguarding information relevant to the issue raised

3. Lawful Bases for Using Personal Data

Under UK GDPR, LCS must have a lawful basis before collecting or using personal information. The lawful basis we rely on will depend on the purpose for processing.

LCS may use the following lawful bases:

Consent

We may rely on your clear agreement to process data. Consent can be withdrawn at any time.

Contract

We process information to deliver services agreed with you or to take steps at your request before entering into a contract.

Legal Obligation

We process information when we must comply with the law, including safeguarding, court directions or health and safety duties.

Legitimate Interests

We may process information where it benefits children, families, or LCS in a way that does not override your rights.

For example, safeguarding assessments require us to understand risks, family dynamics, welfare concerns and relevant history.

Vital Interests

We may process information where someone is at immediate or serious risk of harm.

Public Task

Where our work supports statutory functions, such as acting on the direction of family courts, we may process information under this basis.

Your data protection rights may differ depending on which lawful basis applies to the specific processing.

4. Your Data Protection Rights

Under UK GDPR, you have rights over your information. These include:

- **Right of access** – to request copies of your personal data
- **Right to rectification** – to request correction of inaccurate or incomplete information
- **Right to erasure** – in some circumstances you can request that your data be deleted
- **Right to restrict processing** – to limit how we use your information
- **Right to object** – to object to certain types of processing
- **Right to data portability** – to request that information is transferred to another organisation or returned to you
- **Right to withdraw consent** – where consent is our lawful basis

We must respond to requests within one month.
Requests can be made using the contact details at the start of this policy.

5. Where We Obtain Personal Information

We may receive information from:

- you directly (including referral forms and discussions)
 - family members or carers
 - social services and safeguarding teams
 - CAFCASS
 - family courts and legal representatives
 - local authorities and public sector organisations
 - health and education professionals
 - other contact centres or voluntary organisations
 - regulatory bodies
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6. How Long We Keep Information

LCS retains information only for as long as required for operational, legal or safeguarding purposes. Our retention schedule is as follows:

Type of Record	Retention Period
HR and volunteer files, including training and references	Six years after role ends
DBS results (date, decision, outcome only)	Until new check completed or individual leaves
Paper based referral records, court orders, CAFCASS involvement, pre contact assessments, attendance	Securely disposed of five years after final contact
Electronic referral and safeguarding records	Kept indefinitely as children may request records up to age 25 through statutory routes
Accident books	Minimum three years
Health and safety records	Minimum six years

RIDDOR records

Minimum forty years

Financial records

Minimum six years (longer where required by funders)

7. Who We Share Information With

LCS will only share information when necessary and lawful. This may include:

- safeguarding agencies and local authorities
- family courts and legal representatives
- social care professionals
- other organisations previously involved in contact arrangements
- regulators and external auditors
- organisations with a legal right to request information
- solicitors involved in the case
- NACCC auditors where required

We do not sell personal information under any circumstances.

8. Information Security

LCS takes the security of personal information seriously. We use a combination of organisational, technical and physical measures to protect data, including:

- controlled access to digital systems
- staff and volunteer confidentiality agreements
- monitoring of information security practices
- secure electronic storage and back up processes
- limited use of paper records, stored securely with restricted access
- CCTV in relevant storage areas
- regular review of safeguarding and information security procedures

Any staff member or volunteer who breaches confidentiality or information security requirements may be subject to disciplinary action.

9. Changes to This Privacy Policy

We review this notice annually and update it where needed. We will not reduce your rights below those guaranteed under UK law.

10. How to Complain

If you are unhappy with how your data has been used, you may contact LCS using the details at the top of this notice.

You also have the right to complain directly to:

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

ICO Helpline: 0303 123 1113

Website: www.ico.org.uk/make-a-complaint
