



Below you will find the SVPs policy on processing data of Children. Please take a moment to read over it.

SVP Policy on processing data of Children

- 1.** The Processing of Personal Data relating to children is considered to be high risk and must be undertaken in accordance with the legislation and the provisions of the DPA 2018.
- 2.** Children need particular protection when you are collecting and Processing their Personal Data because they may be less aware of the risks involved. This is especially relevant to SVP as the majority of its beneficiaries are children.
- 3.** SVP is required to think about the need to protect children in all of its Processing activities and design its systems and processes with this in mind. In particular it is important that the principles of fairness are applied to the Processing of a child's Personal Data.
- 4.** Generally, in Processing the Personal Data of children it is best to apply a principle other than consent to the lawfulness of any Processing. If consent is the basis of the Processing in the UK children aged 13 or over are able to provide their own consent. Prior to 13 a parent is required to give consent on their child's behalf. In certain circumstances, consent may need to be supported by the parents even if the child is over the age of 13.
- 5.** SVP has designed its systems so that consent is obtained from the child they are supporting and their parents. Generally Processing of children's data will only take place where there is no other alternative.
- 6.** SVP does not use children's Personal Data for marketing purposes or creating personality or user profiles, if changes are proposed, a DPIA will be required.
- 7.** SVP shall not usually make decisions based solely on automated Processing about children.
- 8.** SVP has written clear privacy notices for children so that they are able to understand what will happen to their Personal Data, and what rights are available to the children.
- 9.** Children have the same rights as adults over their Personal Data. These include the rights to access their Personal Data; request rectification; object to Processing and have their Personal Data erased.
- 10.** An individual's right to erasure is particularly relevant if they gave their consent to Processing when they were a child. However, as in most the child's Personal Data was not Processed on the basis of a contract or legitimate interests, it is unlikely that this will be much of an issue for SVP.