

# Privacy Notice for UW Youth Programs

## 1. Introduction

Annually, the University of Washington (“UW”) engages with over 94,000 youth in more than 200 programs. This Privacy Notice for UW Youth Programs (“Notice”) informs parents, guardians, and participating youth who have reached 18 years of age (referred to as “consenting participants”) about privacy practices across certain youth-oriented programs and events that are controlled and operated by UW (“UW Youth Programs”). This Notice applies to UW Youth Programs that provide this Notice to parents, guardians, or consenting participants. This Notice does not apply to any programs or events that are subject to the Family Educational Rights and Privacy Act (FERPA) or the European Union’s General Data Protection Regulation (EU GDPR).

For the purposes of this Notice, personal data is any information that identifies or can identify an individual (either on its own or when combined with other information) such as name, date of birth, level of education, the school a participant attends, or parent or guardian contact information. Personal data can exist in any format, including hard copy or paper format, electronic or digital format, photographs, video recordings, audio recordings, etc.

## 2. Collecting and Using Personal Data

**Depending on the nature of a UW Youth Program, some or all of the personal data described in the table below may be collected and used** for the purpose of providing, operating, improving, and promoting a UW Youth Program, and in certain circumstances, a UW activity or function (the “Purpose”). If certain personal data is not provided to a UW Youth Program, it may limit an individual’s ability to participate in the UW Youth Program, or limit that program’s ability to pursue its Purpose.

If a UW Youth Program engages in any activities in Column 3 of the table below, **it will first ask for permission from a parent, guardian, or consenting participant through a separate consent form** that describes the proposed data processing in more detail.

<p style="text-align: center;"><b>COLUMN 1</b> COLLECTED PERSONAL DATA MAY INCLUDE:</p> <p style="text-align: center;">↓</p>	<p style="text-align: center;"><b>COLUMN 2</b> PERSONAL DATA MAY BE USED TO:</p> <p style="text-align: center;">↓</p>	<p style="text-align: center;"><b>COLUMN 3</b> IF YOU GIVE YOUR CONSENT, PERSONAL DATA MAY ALSO BE USED TO:</p> <p style="text-align: center;">↓</p>
<b>Participant Personal Data</b>		
<p><b>Registration information of a participant under the age of 18</b> (such as name, place of residence, grade level, age or age range, the UW Youth Program with which the participant is involved, etc.)</p>	<ul style="list-style-type: none"> <li>Identify participants and use participant information administratively (ex. for staff/volunteer assignments, ensuring adequate supervision, resource management, attendance, etc.)</li> </ul>	
<p><b>Contact information of a participant under the age of 18</b> (such as email address, phone number, or mailing address)</p>	<ul style="list-style-type: none"> <li>Send communications to participants who are 13 years of age or older during a UW Youth Program relating to announcements, assignments, logistics, mentoring, or similar matters</li> </ul>	<ul style="list-style-type: none"> <li>Send communications relating to announcements, assignments, logistics, mentoring, or similar matters to participants who are under 13 years of age during a UW Youth Program</li> <li>Share contact information within UW for prospective student recruiting (including to contact a participant and/or their parent or guardian)</li> </ul>
<p><b>Background information</b> (such as a participant’s name, level of education, school, school district, athletic history, athletic achievements, relevant coursework, personal statements, exam responses and results, interests, enrollment in past programs, references from a participant’s teachers or coaches, etc.)</p>	<ul style="list-style-type: none"> <li>Evaluate candidates and/or participants for qualifications and preparedness, placement, aligned interests, completion of prerequisites, priority in enrollment, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Share background information within UW for prospective student recruiting (including to contact a participant and/or their parent or guardian)</li> </ul>

<p><b>Health and dietary information</b> (such as environmental and food allergies, dietary restrictions, health conditions, medications, immunizations, etc.)</p>	<ul style="list-style-type: none"> <li>• Be aware of and/or make efforts to address health and dietary considerations</li> <li>• Provide health information to a designated emergency contact, emergency response personnel and/or healthcare providers in the event of a health or safety emergency involving the participant</li> <li>• Maintain compliance with applicable immunization requirements</li> </ul>	
<p><b>Demographic information</b> (such as birthdate or age or age range, race, ethnicity, gender identity, school, school district, etc.)</p>	<ul style="list-style-type: none"> <li>• Share with a third-party (ex. a funding partner) for reporting that is mandatory for the UW Youth Program</li> <li>• Use within the UW Youth Program to understand demographic trends and address diversity and equity (ex. identifying groups that are underrepresented, developing culturally competent content, establishing codes of conduct or practices to address bias, etc.)</li> <li>• Address participants using their preferred gender pronouns, if any</li> </ul>	<ul style="list-style-type: none"> <li>• Share with a third-party (ex. a funding partner) for reporting that is optional for the UW Youth Program</li> </ul>
<p><b>Photographs, video or audio taken or recorded by a UW Youth Program</b></p>	<ul style="list-style-type: none"> <li>• Achieve the educational, experiential, or similar objectives pursued within a UW Youth Program</li> <li>• Measure and/or document UW Youth Program effectiveness</li> <li>• Share with a third-party (ex. a funding partner) for reporting that is mandatory for the UW Youth Program</li> </ul>	<ul style="list-style-type: none"> <li>• Publish in a UW Youth Program's and/or UW's promotional materials such as brochures, online content, videos, etc.</li> <li>• Feature on a UW Youth Program bulletin board, blog, newsletter, or through a similar publicly-accessible medium</li> <li>• Share with a third-party (ex. a funding partner) for reporting that is optional for the UW Youth Program</li> </ul>
<p><b>Content created in a UW Youth Program that identifies or can identify the participant</b> (such as essays, stories, notes, artwork, photographs, audio recordings, video recordings, etc.)</p>	<ul style="list-style-type: none"> <li>• Achieve the educational, experiential, or similar objectives pursued within a UW Youth Program</li> <li>• Measure and/or document UW Youth Program effectiveness</li> <li>• Share content with a participant's peers (ex. as an exemplar, in peer review activities, etc.)</li> <li>• Share with a third-party (ex. a funding partner) for reporting that is mandatory for the UW Youth Program</li> </ul>	<ul style="list-style-type: none"> <li>• Publish in promotional materials of a UW Youth Program and/or the UW such as brochures, website content, videos, etc.</li> <li>• Feature on a UW Youth Program website, bulletin board, blog, newsletter, or through a similar publicly-accessible medium</li> <li>• Share with a third-party (ex. a funding partner) for reporting that is optional for the UW Youth Program</li> </ul>
<p><b>Observations, evaluations or feedback relating to a participant</b> (such as athletic statistics, results related to exams, assessments and formal observations, documenting a participant's interactions with other participants, UW Youth Program staff and/or volunteers, etc.)</p>	<ul style="list-style-type: none"> <li>• Document and/or evaluate participant learning and/or performance</li> <li>• Measure and/or document UW Youth Program effectiveness</li> <li>• Address participant behavior issues (ex. with staff, volunteers, participant, parents, or guardians)</li> <li>• At the request of a parent, guardian, or participant who is 13 years of age or older, provide an assessment of or reference for a participant to a third-party (ex. a letter of recommendation)</li> </ul>	
<p><b>Parent, Guardian, or Consenting Participant Personal Data</b></p>		
<p><b>Registration and contact information of a parent, guardian, or a consenting participant</b> (such as name, address, email address, phone number, mailing address, relationship to participant, participant's grade level, participant's age or age range, the UW Youth Program with which the participant is involved, etc.)</p>	<ul style="list-style-type: none"> <li>• Obtain consent or authorization</li> <li>• Respond to inquiries</li> <li>• Communicate with or provide information to parents, guardians, or consenting participants about a UW Youth Program and/or a participant</li> <li>• Alert parents or guardians regarding a health or safety emergency involving a participant</li> <li>• Provide parent or guardian contact information to emergency response personnel and/or healthcare providers in the event of a health or safety emergency involving a participant</li> </ul>	<ul style="list-style-type: none"> <li>• Contact parents, guardians, or consenting participants about other UW Youth Programs they may be interested in.</li> <li>• Share contact information within UW for prospective student recruiting including to contact a participant and/or their parent or guardian)</li> </ul>

<b>Financial information</b> (such as self-reported income, tax returns, pay stubs, proof of free or reduced-cost school lunch, etc.)	<ul style="list-style-type: none"> <li>Evaluate eligibility in connection with a needs-based UW Youth Program</li> </ul>	
<b>Payment information</b> (such as debit or credit card number, card holder verification information, etc.)	<ul style="list-style-type: none"> <li>Process payments for fee-based UW Youth Programs</li> </ul>	
<b>Drop-off and pick-up information</b> (such as name, address, phone number, email address, relationship to participant, signature, time of arrival and departure, etc.)	<ul style="list-style-type: none"> <li>Oversee participant drop-off and pick-up by a parent or guardian including use of sign-in and sign-out sheets</li> <li>Communicate with a parent or guardian about drop-off and pick-up arrangements</li> <li>Verify identity of a parent or guardian</li> </ul>	
<b>Third-party Personal Data</b>		
<b>Emergency contact information</b> (such as name, address, phone number, email address, relationship to participant, etc.)	<ul style="list-style-type: none"> <li>Alert a designated emergency contact about a health or safety emergency involving a participant</li> <li>Provide a designated emergency contact's contact information to emergency response personnel and/or healthcare providers in the event of a health or safety emergency involving a participant</li> </ul>	
<b>Drop-off and pick-up information</b> (such as name, address, phone number, email address, relationship to participant, signature, time of arrival and departure etc.)	<ul style="list-style-type: none"> <li>Oversee participant drop-off and pick-up by a parent or guardian's designee including use of sign-in and sign-out sheets</li> <li>Communicate with a parent or guardian's designee about drop-off and pick-up arrangements</li> <li>Verify identity of a parent or guardian's designee</li> </ul>	

UW Youth Programs and UW may also use the personal data described above in Column 1 to comply with legal obligations, to meet UW requirements (such as UW Administrative Policy Statements and UW Presidential Orders), and/or for internal UW reporting relating to health, safety, or similar interests.

### 3. Retaining Personal Data

Personal data will be kept as needed to fulfill the Purpose, for at least the minimum retention period according to the UW [General Records Retention Schedule \(https://finance.uw.edu/recmgt/gs\)](https://finance.uw.edu/recmgt/gs) and/or UW [Departmental Retention Schedules \(https://finance.uw.edu/recmgt/depts\)](https://finance.uw.edu/recmgt/depts), as applicable, and per governing laws.

### 4. Sharing Personal Data

#### A. Personal data may be shared within UW:

- On a need-to-know basis to fulfill the Purpose and, when applicable, with prior consent; or
- To comply with legal obligations, to meet UW requirements (such as UW Administrative Policy Statements and UW Presidential orders), and/or for internal UW reporting relating to health, safety, or similar interests.

#### B. Personal data may be shared outside of UW:

- With a contractor providing purpose-related services to a UW Youth Program;
- As part of a legal process in response to requests by government or regulatory agencies, or in connection with a legal obligation;
- To satisfy reporting requests from a third-party (such as a funding partner);
- To provide an assessment of or reference for a participant to a third-party (such as a letter of recommendation) at the request of a parent, guardian, or participant 13 years of age or older;
- With a participant's designated emergency contact, emergency response personnel (such as paramedics or police), and/or healthcare providers in the event of a health or safety emergency involving the participant;
- With a participant's designated pick-up or drop-off person; or
- With prior consent, when applicable.

## 5. Inquiries

For additional information, you may contact the UW Youth Program that provided you with or directed you to this Notice. You may locate the relevant UW Youth Program by consulting your application, registration, and/or similar onboarding materials, by using the directory available at <https://www.uw.edu/youth>, or by contacting the UW Office for Youth Programs Development and Support at [uwminors@uw.edu](mailto:uwminors@uw.edu).

If your privacy-related questions or concerns are not addressed after contacting the relevant UW Youth Program, you may also contact the UW Privacy Office at [uwprivacy@uw.edu](mailto:uwprivacy@uw.edu).

## 6. Effective Date and Changes to this Notice

This Notice is effective as of October 10, 2019. This Notice may be periodically updated. Future versions of this Notice may be posted on <https://www.washington.edu/privacy/notices/youth/>.