

Client – Full Privacy Notice (GDPR compliant)

Connection Support is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your information securely and transparently. This privacy notice sets out, in line with GDPR, the types of information that we hold on you, how we collect it, store, it use it and how long we keep it for.

Data controller:

A controller determines the purposes and means of processing personal information.

Data processor:

A processor is responsible for processing personal information on behalf of a controller. Connection Support is a data processor and on occasion will be a data controller. Our central office contact details are as follows:

Connection Support, Oxford Ltd, 213 Barns Road, Cowley, Oxford OX4 3UT.

Data protection principles

In relation to your personal information, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your information only for reasons that we find proper for the course of your engagement of our services in ways that have been explained to you
- only use it in the ways that we have told you about
- ensure it is correct and up to date
- keep your information for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have not consented to (as appropriate), lost or destroyed

Types of information we process

We hold many types of information about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers
- gender
- ethnicity
- Alternative contact details or next of kin, address, email, telephone and relationship to you
- medical and health information including whether or not you have a disability
- National Insurance number
- Birth certificate or other ID
- Case notes containing information of discussions with you
- Risk assessment containing personal details
- details of your criminal record
- details of GP
- record of convictions
- sexual orientation
- culture / Religion
- Any information you pass onto us and we subsequently receive from outside sources
- any other category of personal data which we may notify you of from time to time
- CCTV images if your visit us at our premises
- Photographs (with your consent)

How we collect your information

We collect information about you in a variety of ways and this will usually start on the receipt of a referral form and further details for this that we will collect from you directly. This includes notes made by our service provider as case notes. Further information will be collected directly from third party agencies who are involved in assisting you. Personal information is kept within the Company's secure IT systems and on occasion locked in client files.

Why we process your information

The law on data protection allows us to process your information for certain reasons only:

- in order to perform a contract
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your information. For example, we need to collect your personal information in order to:

- ensure that we can provide to you the best possible services to assist your needs in relation to meeting our contract with our commissioners.

We also need to collect your information to ensure we are complying with legal requirements such as:

- ensure safeguarding obligations are met as well as our reporting duties in areas such as benefit fraud.

We however mainly collect information so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:

- making decisions about the suitability of your needs to our schemes
- making decisions about who else to contact to assist you with your needs
- providing information to assist you with opportunities available to help you
- maintaining comprehensive up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- dealing with legal claims made against us
- maintaining safety
- monitoring compliance by you, us and others with our policies and contractual obligations
- for any other reason which we may notify you of from time to time

Special categories of data

Special categories of data are information relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- genetic and biometric data
- Criminal conviction and offences

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the information in order to carry out our legal obligations
- we must process information for reasons of substantial public interest
- you have already made the information public.

We will use your special category data:

- for the purposes of ensuring we provide the best possible services to you
- so that we can contact the agencies best able to support you on your behalf

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive information. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction information

We will only collect criminal conviction information where it is appropriate for the services we can offer to you. This information will usually be collected at the assessment stage, however, may also be collected later. We use criminal conviction information in the following ways:

- On some of the assessment forms to state court order, probation order or ASBO with offence, most recent prison, length of sentence and dates served
- To know the appropriateness of providing assistance and to enable risk assessment to be completed

If you do not provide your information to us

One of the reasons for processing your information is to allow us to carry out our duties in line with providing you with the best possible assistance. If you do not provide us with the information needed to do this, we may be unable to assist you.

Sharing your information

Your information will be shared with employees within Connection Support where it is necessary for your service provider to ensure they are providing you with the best possible support. Your information will also be supplied to third party outside agencies who may be able to assist you with your needs as identified by you. These may include a wide range of various health services designed to offer support.

We do not share your information with bodies outside of the European Economic Area.

Protecting your information

We are aware of the requirement to ensure your information is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Where we share your information with third parties they must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your information for

In line with data protection principles, we only keep your information for as long as we need it for, which will be at least for the duration of your involvement with our services until a period of closure for whatever reason is established. We will keep your data for a period after your closure with our services which is generally 6 years in case of legal claims, complaints or safeguarding purposes. Retention periods can vary depending on the information and contracts with our commissioners. These can request for all your information to be handed back to them on the termination of your involvement with us.

If after reviewing your referral form we cannot provide our services to you then we will destroy your information after 6 months.

Automated decision making

We do not make any decision with regards to you using an electronic system without human involvement, which is called automated decision making.

Your rights in relation to your information

The law on data protection gives you certain rights in relation to the information we hold on you, these are:

- the right to be informed. This means that we must tell you how we use your information, and this is the purpose of this privacy notice
- the right of access. You have the right to access the information that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available from The Systems and Senior Administration Manager
- the right for any inaccuracies to be corrected. If any information that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have information deleted. If you would like us to stop processing your information, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the information. For example, if you believe the information we hold is incorrect, we will stop processing it (whilst still holding it) until we have ensured that the information is correct
- the right to portability. You may transfer the information that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your information where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal information. You have a right not to be subject to automated decision making in a way that adversely affects your legal rights.

Where you have provided consent to our use of your information, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the information that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the information where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact The Systems and Senior Administration Manager at connection support (see details below). Please ask your Support Worker if you need any help with this.

Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Data Protection Nominated Person

Connection Support's Data Protection nominated person is the Systems and Senior Administration Manager. You can email her on. They can be contacted on kimhopkins@connectionsupport.org.uk.

Ask your Support Worker if you need help contacting them.