

Privacy Policy – Sensitive Personal data

Spring North is committed to ensuring that we are transparent about the ways in which we use your personal information and that we have the right controls in place to ensure it is used responsibly and is kept safe from inappropriate access, theft or misuse.

Under some of our projects we are directly commissioned to handle personal and confidential information as well as that of our Consortium employees. This notice explains how we use your personal information and tells you about your privacy rights and how the law protects you.

What is personal information?

Personal information can be anything that identifies and relates to a living person. This can include information that when linked with other information, allows a person to be uniquely identified. For example, this could be your name and contact details.

The law treats some types of personal information as 'special' because the information requires more protection due to its sensitivity. This information consists of:

- Racial or ethnic origin
- Sexuality and sexual life
- Religious or philosophical beliefs
- Trade union membership
- Political opinions
- Genetic and bio-metric data
- Physical or mental health
- Criminal convictions and offences

Purposes

Your personal information may be collected and used for one or more of Spring North's services, regulatory functions and/or administrative activities depending on your relationship with Spring North and nature of your contact with us.

Generally, we may need to use some information about you:

- in delivering services and ensuring other statutory or voluntary agencies with whom Spring North is working, are able to deliver 'joined up' services
- in planning future services;
- for managing and checking the quality of our local public services;
- if you apply for a job or become employed by us;

- for ensuring the health and safety of our staff
- to help investigate any concerns or complaints you have about our services and for answering enquiries under access legislation;
- in carrying out our regulatory activities, such as safeguarding, information governance etc.
- for archiving, research, or statistical purposes (including research and evaluation undertaken by any of our teams or in combination with neighbouring authorities to inform future service planning where the use of fully anonymised information would frustrate the purpose of the research).

Personal information

Generally, we collect personal information where:

- you, or your legal representative, have given consent
- you have entered into a contract with us
- it is required by law (such as where this is mandated by statute or under a court order)
- it is necessary for employment related purposes
- it is necessary to deliver health or social care services
- it is necessary to protect you or others from harm (e.g.in an emergency or civil disaster)
- it is necessary to protect public health
- it is necessary for exercising or defending legal rights
- you have made your information publicly available
- it is necessary for archiving, research, or statistical purposes
- is necessary in the substantial public interest for wider societal benefits and is authorised by law

These practical arrangements and the laws governing the sharing and disclosure of personal information often differ from one service to another.

In the majority of our Commissions, personal information is consented to with one of our subcontracted partners (the data processor), in which case the relevant Commissioning body is the Data Controller.

We have developed a Service specific privacy notice template for any commission where we are directly in receipt of personal information and have sole responsibility for its handling and storage. We have a duty in such cases to provide additional information about how we collect and use your information, including;

- why we need your information
- who else we obtain or receive it from
- the legal basis for collection and the choices you have
- who we share it with and why
- how long we keep your information
- how to exercise your rights

Service specific privacy notice template example

Service area: xxx

Purpose: we collect the data in order to fulfil our role as support / advocate / referrer into xxx or use statistics from this data (non-client identifiable) to inform Service Delivery Improvement and Service Planning/Research

Categories of data we collect: xxx

Lawful basis for processing: Information collected and stored by our team is for the legitimate interest of responding to and acting upon the task for which it was provided, namely provision of xxx service.

Who we share the information with: xxx

How long we hold the data: Spring North will hold service user information for no longer than is necessary, and only in an archived electronic format if required to by the commissioning terms, unless a request from the service user is received asking for the destruction / return of personal data.

Your rights

Your rights under the General Data Protection Regulation (GDPR) are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Where applicable, consent is requested before processing information.

We do our utmost to ensure that all reasonable steps are taken to make sure that your data is treated and stored securely. Whilst we hold it, your information is safely stored within the UK

Access to information

To request access / change / removal / restriction of information we may hold, please use one of the following methods to contact our nominated information lead Angela Allen. Telephone: 01254 784105 or email office@springnorth.org.uk

Data retention/criteria

We will only keep your personal information for as long as the law specifies in reference to Records Management.



Signature:

Date: 15.11.23

Review date: 14.11.24