

Our privacy notice for beneficiaries

How we keep your personal information safe

Service Six is committed to protecting our beneficiaries' personal data and this privacy policy states how we collect data, how we store it and how we use it. Here we define 'beneficiaries' as children, young people, adults or professionals who are engaged with any of our services.

The information we collect about you and how we process it is governed by the Data Protection Act 1998; this means we can only keep records that are relevant to our work with you. These records have to be accurate, up to date, secure and kept for a limited amount of time only.

Service Six is registered under the Data Protection Act 1998 as a Data Controller under number Z1997473. Our registered charity number is 1132490. The Service Six registered company number is 6740611.

What information do we collect about you and why do we do this?

Personal information is any information that can be used to identify you. So, for example, if you donate money, request services or products, or become involved in our activities, we may collect and process the personal information that you have provided. We may also collect information from you when you report a problem with our website or if you complete a survey which we use for research purposes.

We collect and process personal information about you where it is relevant to enable us to provide you with a service. Our role is to:

- safeguard and promote the welfare of children;
- make provision for our beneficiaries to receive support;
- provide information, advice and other support for children, young people, adults and their families

Due to the nature of our work in Therapy and Support, this is often sensitive information. The information we collect can include personal characteristics, personal contact details, criminal record information, local authority record information, health information and some other types of information. But the main information are related to why you are using Service Six' services and the work that we are doing with you.

We also aim to collect diversity information for our workforce, commissioners and stakeholders to better understand and integrate equality and diversity considerations into our work and provide the best possible service to children, young people and families. This will help us ensure we are compliant with the Equality Act 2010 and is in line with our Diversity and inclusion strategy. This information can include ethnicity, disability, first language and child needs. It is collected directly from you and it is up to you if you share this with us. Other protected characteristics such as beliefs and sexual orientation may also be collected from a number of sources including local authority data.

Keeping your information up-to-date

To make sure we always have the most up-to-date information about how to contact you, we may also, from time to time, update your records to reflect any changes to your personal information.

This information may come directly from you, or it may come from a third party that we consider is legitimate and trustworthy and in circumstances where it is appropriate and where you will have had a clear expectation that your details would be passed on for this purpose.

We may also combine the information you provide us with information we collect from trusted third parties and partners such as other professionals (GP's, schools, CAMHS etc) and sub-contractors (therapists, trainers etc).

Where do we collect this information from?

We collect this information from your referral documents, from you in phone or face-to-face interviews, from other parties involved with your support and also any other person the practitioner considers it necessary to speak to.

We also obtain information from other agencies, such as the police and local authorities if those information are relevant to safeguarding assessments and this is obtained in line with keeping children safe and making appropriate referrals to the Local safeguarding teams.

During the course of your involvement with us, we may speak with other agencies such as your GP or your school. Usually we will seek your consent for this however should there safeguarding concerns we may not require consent.

Why do we need to keep files?

We keep records to help us to decide how best we can help you. Also we keep files to record how we have worked with you and to assess how successful we have been in helping you.

We may hold your data under 'legitimate interest'. This is how we hold your information if you have signed up to take part in any of our services, interventions and/or activities or if you make a donation to us in any capacity. This legal basis means we only use your data in ways you would reasonably expect and which have a minimal privacy impact. We hold your data in order to support you, and only hold a minimal amount of data, so the privacy impact is minimal.

We may hold your data in order to carry out a contract; for example you have purchased a service and we require your details to carry out the order

Lastly, we will sometimes hold your data with your specific consent. For example, we will have this when you have signed up to receive a newsletter or news about any upcoming events.

How will we use your information?

We use this information to advise, decide and/or make written recommendations about the most suitable service for you. In some cases we may also have to provide a written report to the court if requested.

Sometimes information is shared as part of research to do with Support and Therapy or to represent our work to commissioners and stakeholders; but we will only publish this in a way which means you cannot be identified.

Who can see your records?

- Service Six Staff at the service you use
- Some Service Six senior managers, if necessary
- Service Six' Designated Safeguarding team
- Commissioners and official inspectors might look at your records to check that Service Six is working properly and keeping clear and accurate records

Who will we share the information with?

We will seek permission from you before sharing your records with other services that work with you. We will always respect your wishes if you do not consent to us sharing your information except:

- Where sharing information with another agency is part of the contract for the service you are involved with. We will tell you whenever this applies.
- Where Service Six is delivering the service on behalf of another organisation; again we will explain to you what this means at the start
- Where we believe you are at risk of harm
- Where someone else may be at risk of harm
- If we are legally required to share the information, for example following a court order.

Anonymised information may be published in the form of statistical reports on our website or our annual report, as well as shared with others in relation to therapy and support services.

Do we sharing your information with third parties?

Where we use an external service provider to act on our behalf, we will disclose only the personal information necessary to deliver the service and will have a contract in place that requires the provider to comply with Service Six data protection and information security requirements. For example one third party provider is our IT partner CloudIntellect <https://www.cloudintellect.co.uk/>

We may disclose your personal information to third parties if we are legally obliged to; or in order to enforce or apply our terms of use for this website or other agreements; or to protect the rights, property or safety of Service Six, our donors or others. This includes exchanging information with other companies and organisations for the purposes of fraud detection and protection, or with local authorities or Social Services for the purposes of the provision of health, legal or social care or treatment.

What happens to records when work comes to an end? How long do we keep your information for?

We always have your best interests at heart and your personal information will not be retained by Service Six for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed, subject to certain legal obligations mentioned below.

We will only keep information about you for the length of time it is necessary to do so to engage with you in the way that you have requested and in accordance with our legal requirements and tax and accounting rules. When your personal data is no longer needed, we will ensure that it is disposed of in a secure manner. If you would like us to delete any information we hold about you, please contact us using the details at the end of this document.

We will retain personal data in accordance with our data retention policy, set out below. We review our data retention periods for personal information on a regular basis.

We hold personal information relating to:

- *Client records, including session notes* 7 years from the date of the last treatment/service received. If we have concerns about any client, or in the case of a minor, we may keep records indefinitely and kept within Service Six's archive system; especially if safeguarding concerns were identified.
- *Complaints* 3 years or reasonable time after event of complaint
- *Donations you have made to us* for 7 years since the date of your last donation
- *Legacy donations* if you indicate that you'd like to leave us a legacy gift we will retain personal data until 7 years after the legacy is received
- *Campaigning on our behalf* for 3 years since you last campaigned with us
- *Personal Injury claim* 3 years from the time you became aware of a problem (for minors it is 3 years from the date they reach 18 years of age and there can be other exceptions to the general rule, for example if a claimant does not have full mental capacity.
- *Purchasing services, like training or venue hire* for 3 years
- *Subscribing to a newsletter or news about upcoming events* you can unsubscribe at any time

We are legally required to hold some personal information to fulfill statutory obligations, for example the collection of Gift Aid or to support certain financial transactions.

If Service Six is delivering the service on behalf of another organisation, then the responsibility for the records returns to that organisation at the end of Service Six' contract with them.

Can you see what information we hold about you?

Yes, you are able to see your records and receive copies at any time by applying to the Service Six Data Protection Officer. This is called a Subject Access Request. A request needs to be made to the contact details below, giving your name, address, the information/documents you would like to access and the method of access (e.g. hardcopy, e-mail, face-to-face etc.) via email, post or face-to-face:

- Data Protection Officer @ referrals@servicesix.co.uk
- Attn: Service Six Data Protection Officer, 15 Sassoon Mews, Wellingborough, Northamptonshire, NN8 3LT

Should you request a face-to-face meeting we will arrange for you to look through your file in the presence of a member of staff who can answer questions and note any changes you think should be made to your record.

Information requested is usually free of charge and will usually be responded to within 40 days of you asking. In some cases if a large volume of information is requested in hard copy we may issue a fees notice for disbursement costs (printing and postage)

Under the Freedom of Information Act 2000, you have a general right of access to all types of recorded information held by public authorities, unless particular exemptions apply. The Act aims to improve the openness and transparency of public authorities, and Service Six is committed to complying with this legislation.

Our policy is to be as open as possible, but we may withhold information if we consider an exemption applies. Sometimes Service Six receives information from someone (e.g Doctor, Social Worker etc) that is written in confidence. When this happens we have to obtain the agreement of the person providing the information before sharing it with you. On very rare occasions we might withhold some of the information because it could seriously harm you to see it. References to other people might also be withheld.

If we refuse to supply all or part of any information you have asked for we will write to you giving our reasons for refusal. The reasons will be based on the exempted categories under the Freedom of Information Act 2000. If you are unhappy with the way in which your request was handled you can request an internal review. A senior member of staff who was not party to the original decision on whether to release the information will review the manner in which the request was dealt and will either uphold or overturn the original decision.

Can you correct your information if you tell us it is wrong?

You have a right to ask us to correct any inaccuracies in the information we hold about you. Please contact your practitioner if any of the information we have recorded about you is not correct or is out of date. We will either amend the information, or add a note to show that it is contested.

How do we keep your information secure?

We understand that, due to the nature of the work we carry out with children, young people, adults and families, we often deal with personal information that is sensitive. It is our duty to handle this information correctly and protect it from falling into the wrong hands and therefore take all appropriate technical and organisational measures against unauthorized or unlawful processing of your personal data. We also do all we can to protect personal data against accidental loss, destruction or damage.

We protect it by holding new information on our secure electronic case management system and old information in archives on our secure database system. We also send sensitive information by secure methods, either by secure postal services or electronically encrypted via secure email. This ensures that only those with the right to view the information can access it.

How to best protect yourself and your personal information?

To protect yourself when sending us sensitive information, please ensure that you use devices running supported operating systems that are regularly patched, and incorporate some form of malware protection. Only connect your devices to networks that you trust.

Securing your passwords - Where we have given you (or where you have chosen) a password which enables you to access certain parts our documents, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.

Updates or changes to the privacy policy

We reserve the right to make changes to this Privacy Policy. Each time you visit this site or access our service you should check this Privacy Policy to check that no changes have been made to any sections that are important to you. Where appropriate, any changes will be notified to you by email.

Complaints

If you have any questions or concerns about this privacy policy and our privacy practices or if you wish to file a complaint, please contact us by emailing referrals@servicesix.co.uk or calling 01933 277520.

You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR. You can do so by calling the ICO helpline on 0303123113 or via their website www.ico.org.uk

Data Protection Officer

Contact Service Six's Data Protection Officer by emailing referrals@servicesix.co.uk or by writing to:

Data Protection Officer
Service Six
15 Sassoon Mews
Wellingborough
Northamptonshire
NN8 3LT