

# Lower Earley *Family Contact Centre*

## Privacy Policy

### Our Privacy Policy explains:

- What information we collect and how we collect it
- Why and how we use your information.
- How long we keep your information from other third-party sources

We collect your information from:

- Self-Referral Forms
- Referrals from organisations e.g. Cafcass, Family Solicitors
- Pre visit checklist

We may also collect information from telephone conversations, emails and written and verbal communications and from records of the LEFCC sessions.

### Information this policy covers

Personally Identifiable Information (PII) we process may include Personal and Sensitive data. Personal Data covers data relating to an individual, such as names and addresses. Sensitive data is information relating to an individual's, race or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual life or civil or criminal offences.

### How we use your information

Your PII may be used in the following ways:

- To provide our services to you,
- To respond to your requests and inquiries,
- To comply with applicable law(s) (for example, to comply with a search warrant or court order) or to carry out professional ethics/conduct investigations,

### Consent and lawful processing of data

Our legitimate interests, which include processing such Personal Data for the purposes of

- providing our services.
- administration and programme delivery
- for dealing with medical needs - any information you provide we must have had explicit consent to use.
- all other cases: that it is necessary for our legitimate interests which are to run the contact centre

### How long will we keep your information?

File Type	Retention Period
Disclosure and Barring Service Certificate (formerly Criminal Records Bureau disclosures certificates) obtained as part of the vetting process.	The actual disclosure forms are destroyed after 6 months. But the centre keeps a record of the date of the check, the reference number, the decision about vetting and the outcome.
Referrals, with or without court orders or CAF/CASS involvement, pre- visit forms	Securely disposed of within 6 months of the family leaving the Centre unless a safeguarding or child protection issue
Attendance records	Kept indefinitely
Accident books and paperwork relating to safeguarding or child protection issues about a specific child	Kept indefinitely as children can request this information up to the age of 25 years from Local Authorities.

### Sharing and disclosing to Third Parties

We may disclose your PII to third parties from time-to-time under the following circumstances:

- You request or authorise the disclosure of your personal details to a third party.
- The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant or court order).
- Legal and compliance consultants, such as external counsel, external auditors

### **Subject Access/User Rights**

As a user, you are subject to the following rights:

- The right to be informed of the use of your Personal Data
- The right to access and/or to require the correction or erasure of your Personal Data
- The right to block and/or object to the processing of your Personal Data
- The right to not be subject to any decision based solely on automated processing of your Personal Data
- In limited circumstances, you may have the right to receive Personal Data in a format which may be transmitted to another entity.

If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with the Information Commissioner Office.

You may seek to exercise any of these rights by updating your information by sending a written request to the centre coordinator.

### **Information security**

We are working to protect your personal information that we hold, its confidentiality, integrity and availability.

- We restrict access to PII to contact centre volunteers subject to strict confidentiality obligations
- We have a Security Information Policy, reviewed regularly, in place which defines the measures we take to protect your PII. We use a combination of technology, procedures and physical security measures, to guard against unauthorised access to systems.

LEFCC also has

- processes to ensure that the PII held remains accurate and up to date
- a process to securely dispose of PII that is no longer required or where an individual has asked LEFCC to erase it
- procedures to respond to an individual's request to restrict the processing of their PII
- procedures to handle an individual's objection to the processing of their PII
- processes to identify, report, manage and resolve any PII breaches
- Procedures covering the receipt, storage, correction and deletion of PII.

### **Compliance and cooperation with regulatory authorities**

We regularly review our compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the ICO to resolve any complaints regarding PII that we cannot resolve with our users directly.

### **Changes**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent.

### **How to contact us**

lowerearleyfcc@gmail.com

### **Privacy statements**

The Contact Centre will provide a copy of this privacy policy to all data subjects, for which we hold data, in line with ICO guidance about following GDPR.