

## Privacy Notice for Families Using our Services

At **Home-Start Epsom, Ewell and Banstead** we're committed to protecting and respecting your privacy.

This notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Any questions regarding this notice and our privacy practices should be sent by email to the Manager [manager@hseeb.org.uk](mailto:manager@hseeb.org.uk) or by writing to the Manager. Alternatively, you can telephone 01737 379902.

### Who are we?

Home-Start is committed to protecting your personal information and to being transparent about what information we hold. Home-Start understands its obligations to you to help you understand how and why we process your personal data. We will only do so in accordance with all applicable UK data protection legislation, including the General Data Protection Regulation. In this notice 'Home-Start', 'we', 'us' or 'our' means:

- Home-Start Epsom, Ewell and Banstead a charitable company limited by guarantee.
- Company no. 8765689
- Charity no. 1156539
- Registered office: 128 Great Tattenhams, Epsom, Surrey KT18 5SE

### Families who use our services

#### How do we collect information from you?

##### *Information you give us directly*

We collect information about you and family members when you register with us for any of our services and also when you start to receive our services. We collect information when you voluntarily complete service user surveys, provide feedback and participate in events.

##### *Information from our staff*

Our staff will create records about you while delivering services, for example by way of notes added to your case file

##### *Information we receive from other sources*

Your information may be received by us from third parties, which might include:

- agencies who are referring you to us;
- professionals and other support agencies, such as health visitors, social care professionals, other voluntary organisations or charities
- members of your family who are using Home-Start services

### What type of information is collected and used about you?

The information we collect and use will include personal data and sensitive data (known as 'special category data' in data protection law).

These records may include the following information relevant to you, your partner and the children you care for and anyone else who is part of your household:

- your name and contact details (including postal address, email address and telephone number);
- your date of birth;
- contact details and background information of other members of your family
- your Next of Kin, GP and Health Visitor contact details
- contact we have had with you, including home visits

- income and financial details
- employment information
- children’s information may include schools or nursery attended
- information from people who are involved with your family, such as; schools, health professionals, social services and relatives and whether any children are subject to child protection/child in need plans or have other assessment needs
- information about lawyers or other representatives we may encounter in the delivery of services
- information about your use of our website and about the device used to access it, for instance your IP address and geographical location;
- any other personal information shared with us.

Data protection laws recognise certain categories of sensitive personal information as ‘special category’ and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We may collect and use the following types of special category information:

- disabilities, special educational needs or health condition
- details and records of medical treatment and medications
- your race, religion or beliefs or political views
- information about an individual's sex life or revealing an individual's sexual orientation
- criminal convictions that have been committed against an individual or which an individual has committed

### **How and why is your information used?**

We will only collect and use the minimum necessary information needed for us to provide you with our services and for staff to deliver and provide appropriate support to meet your needs.

We use this information only to the extent necessary to provide the services to you that you have requested from us unless there are exceptional circumstances, such as when the health or safety of a child or others is at risk, or other situations where the law requires the disclosure of information.

If you do not provide us with information that we ask for and that we require, we may not be able to provide services to you. If you are uncomfortable about disclosing certain information to us or if you have any concerns or queries about why we require certain information, we are happy to discuss this in further detail with you.

In limited circumstances, we may ask for your consent to use your information (for example, for your experience with us to be used in Home-Start materials or on our website). In these circumstances, we will always ask for your explicit consent beforehand, and we will tell you how you can withdraw your consent if you change your mind (which you can do at any time).

### **Receiving communications from us by Email/text/Phone/Post**

You have a choice about whether or not you wish to receive information from us. If you want to receive direct marketing communications from us about the vital work we do for families and the products and services available to you, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We will only send you marketing communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails. We may send you marketing communications by post unless you have told us that you would prefer not to hear from us.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are notifying you of an office closure or a change to your appointment time.

### **Where is your information kept and long is it kept for?**

Information is retained in secure electronic and paper records and access is restricted to only those who need to know. Our guiding principle is that we are holding your information in strict confidence and in accordance with the law.

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for depends on our requirements to provide our services and run our business or to comply with the law. Case records are generally kept on our live system for up to 1 years (6 yrs for safeguarding), after which time they are anonymised. In certain circumstances we may be required to keep records for a longer period, depending on the nature of the case and whether or not we are subject to separate legal obligations which require us to do this.

### **Who has access to your information?**

In order to provide you with our services, we will share your information internally within Home-Start on a need to know basis, to ensure we are providing you with a good service. We may also share your personal information with some or all of the following parties, but we will always do this in compliance with data protection law:

- other charities and public sector organisations that may have referred you to us, may be providing services to you or that we may be working in partnership with
- health and education professionals (such as health visitors or head teachers)
- other family members (where you are comfortable with this)
- local council social work departments
- the Police, Courts or Charity Commission
- safeguarders and other parties in connection with child or adult protection
- lawyers or other representatives that may be acting on your behalf
- statutory bodies in connection with legal and formal processes.
- third parties working on our behalf (for example, to support our IT systems, or to send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own purposes.

We do not sell or rent any of your information to third parties.

We do not share any of your information with third parties for marketing purposes unless you have requested us to do so.

We will only share special category information with other organisations where that is necessary for legal reasons, or where there are other substantial public interest grounds.

### **Lawful Processing**

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

#### ***Legitimate interests***

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Home-Start as a charitable organisation in pursuit of our aims and ideals. For example to:

- provide our services to support you and your family;
- send postal communications which we think will be of interest to you;
- conduct research to better understand our customers and supporters and to improve the relevance of our fundraising;
- understand how people choose/use our services and products;
- determine the effectiveness of our services, promotional campaigns and advertising;
- monitor who we deal with to protect the charity against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

### ***Specific Consent***

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

### ***Legal obligation***

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission, or we are required to report a crime.

### ***Vital interests***

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual) or a safeguarding issue which requires us to share your information with the emergency services.

### **Our lawful grounds for processing Special Category data**

When we use special category (sensitive) personal information, we require an additional legal basis to do so under data protection law. Our basis for using such information is normally to provide our services of counselling, social care, and safeguarding children and individuals at risk of neglect or physical, mental or emotional harm and for protecting their economic well-being. Sometimes we may use another route available to us at law (for example, if we need to process it for social protection purposes, vital interests, or, in some cases, if it is in the public interest for us to do so).

### **Your Rights**

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that are likely to apply to you when we are processing your personal information.

#### ***Right of access***

You have a right to request access to the personal data that we hold about you.

You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, please contact the address provided below, or telephone or e-mail.

#### ***Right to have your inaccurate personal information corrected***

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe any of the information we hold is inaccurate or out of date, please contact us via email, telephone or post (see below).

#### ***Right to restrict use***

You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we are not lawfully allowed to use it.

#### ***Right of erasure***

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to by law. In many cases, we will anonymise that information, rather than delete it.

#### ***Right for your personal information to be portable***

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, for example, when you shop from our website, you may ask us to provide it to you or another service provider in a machine-readable format.

#### ***Right to object***

You have the right to object to processing where we are using your personal information based on legitimate interests, (or for statistical/research purposes). In these circumstances we will consider your request against our legitimate reasons for continuing to process your information.

You have an absolute right to object to direct marketing. If you wish to opt-out of receiving marketing materials from us at any time, please contact the address below.

If you want to exercise any of the above rights, please contact us. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's [Information Commissioner's Office](#).

For further information on each of these rights, including the circumstances in which they apply, visit the Information Commissioner's Office ("ICO") website at <https://ico.org.uk/for-the-public>

If you would like to exercise any of the rights, please email, call or write to us using the details in 'How to contact us' below, let us have enough information to identify you, let us have proof of your identity and address, and let us know the information to which your request relates.

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#### **Keeping your information safe**

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it, such as Firewalls, anti-virus protection and encryption. Home-Start has developed a set of security policies that include device security, authentication requirements, acceptable usage of resources, data storage requirements. We undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriately trained staff, volunteers and contractors, on a need to know basis.

**Keeping your information up to date**

We take reasonable steps to ensure your information is accurate and up to date. Where possible we use publicly available sources to identify deceased records or whether you have changed address. We really appreciate it if you let us know when your contact details change.

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**16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission before you provide us with personal information.

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**Vulnerable circumstances**

We are committed to protecting vulnerable supporters, customers and volunteers, and appreciate that additional care may be needed when we use your personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

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**Changes to this notice**

Any changes we may make to this privacy notice in the future will be posted on our website so please check the website occasionally to ensure that you're happy with any changes.

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**Review of this Privacy Notice**

We keep this privacy notice under regular review. This notice was last updated in June 2019.

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**How to complain**

Please report any complaint to the details set out in 'How to contact us' below. We hope we can resolve any query or concern you raise about our use of your information. You also have the right to lodge a complaint with the ICO who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

**How to contact us**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you at:

128 Great Tattenhams  
Epsom  
Surrey  
KT18 5SE  
01737 379902  
admin@hseeb.org.uk

Data Protection Trustee: Richard Moody