



Privacy Policy for Service Users and Families

Document control	
Reference	LINK015 Privacy Policy for Service Users and Families
Version & Status	v2.0
Purpose/ remit	This document describes the Link's data protection responsibilities to service users, clients and customers and the organisation's overall approach to ensure compliance with applicable laws and business objectives.
Owner	HR, Information Governance Team
Approval body	CEO, Information Governance Lead
Date of issue	July 2023
Review Date	July 2024
Applies to	Service Users, Clients, Customers
Notes;	
Classification	Public

Related Documents	
Reference:	Purpose/remit of policy



Privacy Policy for Service Users and Families

Personal Data

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

In order for us to provide a service to children, young people and families, we need to collect personal data including health information which is a special category of personal data.

The Link are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of privacy. We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR).

We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

Data Protection Officer is Holly Gibson, The Link, 101 The Greenway, Middlesbrough, TS3 9PA. 01642 505580. info@redcarlink.com.

Personal Data The Link collects

Personal and sensitive information we collect may include:

- The reasons for referral and information supplied by a referrer. This will include your name, date of birth, address, contact telephone numbers, email address and certain health information.
- The information supplied by you at first contact and in your assessment session; with additional information from professionals where applicable.
- Clinical assessments and plans relating to your care or support.
- Summary records of your care and support.
- Copies of any letters or emails sent to you or received from you.
- Details of any telephone conversations with you.

We collect this personal information in order to provide a service to children, young people and families (including communicating with you, your referrer, other medical advisors, care and support providers as appropriate)

The personal data or information we hold is to enable us to provide the best support that we can to children, young people and their families.

You can ask to see what information we have recorded about you at any time by contacting The Link's Data Protection Officer (DPO) via email to info@redcarlink.com



The Link are the data controller for the purposes of the General Data Protection Regulation (GDPR).

Legal Obligations

Under the GDPR, The Link must always have a lawful basis for using your personal data. We process your personal information so that we can comply with various legal obligations. This includes complying with legislation relating to health and social care.

Legitimate Interest - GDPR Article 6(1)(f):

We keep information about you and the work we do with you. Our legal basis for this is 'legitimate interest'. We cannot work with you unless we do this, other than provide basic information. Your record will include:

- Basic details about you, for example your address and date of birth, and your characteristics, for example your ethnicity
- Information about your circumstances
- Notes about contacts we have had with you
- Notes about the support we have provided or activities we have done with you
- Use and record the information from outcomes tools to help guide our support for you.
- Information from other people supporting you if relevant
- Information about other people involved with you such as your emergency contact

Your information is used to:

- Make decisions about how we can best help you and involve you in the right activities
- Investigate any concerns or problems that happen
- Check and review the quality of our work with you
- In some cases, evidence our work to funders and claim payment for it.

Consent - GDPR Article 6(1)(a):

To hold your personal data, we need to have a Legal Basis. Your 'consent' is the legal basis that we will rely on, in the first instance. Consent is essential to enable us to support children and young people.

You may withdraw consent and agreement for The Link to process your personal information at any time by writing to The Link.

We will never give information to anyone outside of The Link without your consent, unless it is to keep you or somebody else safe from harm, or if it is a legal requirement.

Sharing information

The Link has a data protection policy which means that relevant information is only shared with people involved in supporting children, young people and families. This will include:



- staff engaged by us to carry out our services
- Your referrer
- statutory bodies to whom The Link is required to submit data

Apart from these people, The Link will not pass on your personal data to third parties without first obtaining your consent, however, there are times when information, legally, has to be given even without your consent, these would include; child protection, prevention of harm to self or others.

We know that to make a difference, it's best when we work in partnership with children, young people and families, Education, local authority and health professionals, funders and commissioners and carefully selected partner agencies. We will share information with these organisations or individuals for whom you have given your signed consent on our consent form.

We collect information for our funders so we can show them how their funding helps children, young people and their families.

We often complete monitoring reports for our funders and commissioners, so they know that our work makes a difference. We share this information because it is part of our contract or agreement with our funders and commissioners.

These reports can include:

- Information about the numbers of children, young people and families supported, including how many times they've been supported
- The outcomes achieved
- Case studies, which are always anonymised to protect identities.

We will never share with a funder or commissioner your personal information.

We will share information without consent if we have a safeguarding concern, duty of care or legal requirements to do so.

How long we keep your personal information

We will retain your personal data as follows:

Personal data will be retained for a minimum period stipulated by the funder or inspection/regulatory body at the end of each project. This will be logged, and the data will be deleted as soon as the archive date is reached.

We may also retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of other people.

Generally, client records are kept on The Link's secure database for 20 years after last contact, (8 years after death).



How we store your personal information

We use both paper records and electronic records to store information about the people we work with. Paper files are kept in secure and locked locations.

Electronic records are kept on a secure data system (IAPTUS).

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to The Link employees and our carefully selected partners.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your Rights as a data subject

At any point while we are in possession of or processing your personal information, you have the following rights:

- Right to be informed
- Right of access- this needs to be requested in writing
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Right not to be subject to automated decision making

You may instruct us to provide you with any personal information we hold about you. In some circumstances, information may be withheld if it is felt to be in your best interests to do so or for the protection of others. Your information will be supplied within 30 days of receipt of request.

You can also withdraw your consent for The Link to process your personal information.

Requests can be made in writing to: The Data Protection Officer, The Link (Redcar) CIC, 101 The Greenway, Middlesbrough, TS3 9PA

OR by email to:

The Data Protection Officer, info@redcarlink.com

Complaints

In the event that you wish to make a complaint about how your personal information is being processed by The Link (or third parties as described), you can contact our Data Protection Officer.

If you are not satisfied with how your complaint has been, or is being, handled, you have the



right to lodge a complaint directly with the Information Commissioner's Office who is the identified supervisory body:

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0330 8303 0338

Further Information

You can also get further information from The Information Commissioner: www.ico.org.uk

The Link are committed to ensuring that the information we collect and use is appropriate, and does not constitute an invasion of privacy. We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR).

By signing the consent forms you confirm your consent for The Link to process your personal information.

Appendix A: Review & Sign-Off Log

Date	Version	Changes	Approval Signature
27.07.23	2.0	Policy reformatted to include document control and sign off log	