

Home-Start Southern Oxfordshire Privacy Notice

At Home-Start Southern Oxfordshire we are committed to protecting and respecting your privacy.

This Privacy 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 admin@homestartso.org or by writing to Home-Start Southern Oxfordshire, 197 Broadway, Didcot, OX11 8RU. You can also telephone 01235 511152.

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Who are we?

Home-Start Southern Oxfordshire is committed to protecting your personal information and to being transparent about what information we hold. Home-Start Southern Oxfordshire 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 Southern Oxfordshire, a charitable company limited by guarantee.
- Company number: 05443274
- Charity number: 1113941. Registered office: Home-Start Southern Oxfordshire, 197 Broadway, Didcot, OX11 8RU

The personal data we collect from you, how we collect and use it

- APPENDIX 1 – Families using our services
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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 us using the details shown above.

Right to have your inaccurate personal information corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us. Please tell us if any of your details change, or if you believe any of the information we hold is inaccurate or out of date.

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, 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 us at the address below.

If you want to exercise any of the above rights, please contact us at the address below. 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 please consult the guidance published by the UK's Information Commissioner's Office, www.ico.org.uk.

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. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Keeping your information up to date

We take reasonable steps to ensure your information is accurate and up to date. Please tell us if your contact details change.

Aged 16 or under

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

Vulnerable circumstances

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

Review of this notice and changes to the notice

We keep this notice under regular review. Any changes we may make will be posted on this website so please check this page occasionally. If we make any significant changes, we will make this clear on the website.

How to complain

Please report any complaint using the details 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

If you have any questions about this Privacy Notice or the information we hold about you, please contact us at:

Home-Start Southern Oxfordshire, 197 Broadway, Didcot, OX11 8RU

Email: admin@homestartso.org

Telephone: 01235 511152

Two of our trustees act as our 'Data Protection Leads'.

APPENDIX 1

Families using our services

How do we collect information from / about you?

Information you give us directly

We collect information about you and your 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 or 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, address, contact details
- 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 information
- employment information
- children's information, which may include nursery or schools attended
- information from people involved with your family, such as: schools, health professionals, social care, relatives
- whether 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
- 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 concerning:

- disability, special educational needs, health conditions
- medical treatment, medications
- race, religion or beliefs, political views
- sexual behaviour, 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 amount of 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 publicity or on our website). In these circumstances, we will always ask for your explicit consent first, 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

We will need to contact you to enable us to support you, and for administrative purposes such as a change to an 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 for which it was collected. The length of time we retain your personal information depends on our requirements to provide our services, or to comply with the law. Case records are generally kept on our live system for up to one year, after which time they are anonymised so that any identifiable information is removed. 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 requiring 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 school headteachers)
- other family members (where you are comfortable with this)
- local council social work departments
- the Police, Courts or Charity Commission
- other agencies 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). 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.

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

We consider our legitimate interests to be running Home-Start as a charitable organisation in pursuit of our aims and ideals, and to provide our services to support you and your family.

When we legitimately process your personal information, 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 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 or texts.

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), or a safeguarding matter 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 in 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).

APPENDIX 2

Human Resources: (a) Volunteers and trustees

How do we collect information from you?

The information we hold about you is primarily information you provided when applying for a volunteer/trustee role, supplemented by information generated during your time with Home-Start.

What type of information is collected from / held about you?

- your name, address, contact details
- unique personal identifiers, e.g. date of birth, photographs
- your application
- CV (trustees)
- references
- personal data provided by you for a specific purpose, e.g. disability, medical conditions
- copies of passports, visas and any other documentation required to ensure compliance with Home Office requirements
- interview notes
- supervision and review notes (volunteers)
- details of driving documents (volunteers)
- details of training undertaken
- time and attendance details
- bank account details for expenses purposes
- details of next of kin, for emergency use.

Sensitive personal data

Some personal data is considered under data protection law to be 'special category data' for example, in relation to your health or ethnicity. We also use other data which you may consider to be sensitive, such as financial information. The information we hold is that which you provide to us (e.g. you may give us information when you applied for your role, or in response to surveys).

Records may contain:

- individual demographic information in compliance with legal requirements (such as marital status, national identifier (e.g. National Insurance number), passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
- health information requiring adaptations for your Home-Start role
- health and safety incidents, accidents while volunteering and associated records.

How and why is your information used?

We are required to use your personal data for various legal and practical purposes for the administration of your role as a volunteer or trustee.

How long is your information kept for?

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. If an allegation has been made about a volunteer or trustee, the file is kept for 10 years. Data will be deleted when no longer required.

Who has access to your information?

Personal data, including sensitive personal data, may be shared with members of staff and trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that special category personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without obtaining your consent. This will only occur in compliance with data protection law if it is necessary to protect your vital interests or the vital interests of another person, or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations. We may disclose certain personal data to third parties. These third parties, and the purpose for sharing the information, are set out below:

- Relevant data may be shared with your next of kin but only with your consent or in an emergency
- Relevant data may be shared with the Home-Office, UK Visas and Immigration for the purpose of proving eligibility to work in the UK
- Data may be shared with reputable 'data processors' for the purpose of sending communications, e.g. surveys

- With your permission we may share information about you for publicity and marketing purposes online, in print and on social media.

Otherwise we do not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

Lawful Processing

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

The lawful basis for processing your personal data is that it is a legal obligation for you to provide much of the information detailed. The information is necessary for the performance of your volunteering / trustee role. Without this we are unable to fulfil our obligations, and you would not be able to continue as a volunteer or trustee.

APPENDIX 2

Human Resources: (b) Job candidates

How do we collect information from you?

As part of our recruitment process we collect, process and store personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application, interview, and pre-employment checks .

What type of information is collected from / held about you?

We may process the following information:

- your name, address, contact details
- date and place of birth
- your job application
- education and training history including professional qualifications and skills
- work history and current salary
- interview records and references
- results of screening and pre-employment checks, such as DBS checks
- attendance details.

Sensitive personal data

Some personal data is considered under data protection law to be 'special category data' for example, in relation to your health or ethnicity. Special category personal information is collected where we have a legal obligation to do so or if you choose to disclose this to us during the course of your relationship with us. We request information about disability in order to make reasonable adjustments to enable all candidates to apply for jobs with us and attend interviews, and to ensure that we comply with regulatory obligations with regard to recruitment.

Records may contain:

- individual demographic information in compliance with legal requirements (such as marital status, national identifier (e.g. National insurance number), passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
- health information requiring adaptations to the working environment
- health and safety incidents and associated records.

How and why is your information used?

In order to manage your application, we need to process certain personal information about you. The purposes for this are set out below. We only process your information as required to progress your application, or as required by law or regulatory requirements, so not all of the purposes set out below will apply to all candidates.

- Application: application form, name, address, date of birth, employment history, academic and professional qualifications, nationality, criminal record, diversity (including gender, ethnicity, disability, sexual orientation)
- Assessment: interview, exercises undertaken as part of interview process
- Pre-employment: right to work in the UK, qualifications, references.

How long is your information kept for?

Unsuccessful candidates: application forms will be retained for one year following the recruitment process.

Successful candidates: personal information collected as part of the recruitment process will be transferred to an employee personnel file and retained for six years following termination of employment. However, if an allegation has been made about an employee, the personnel record is retained for 10 years.

Who has access to your information?

The recruitment process will involve:

- assessing and progressing your application
- assessing your suitability for the role
- activities needed to complete screening and administrative processes if your application is successful

Your personal information will be shared internally, to enable these processes. The information shared is limited to what is required by each individual to perform their role in the recruitment process. Your personal information may be shared with administrative staff, the shortlisting/interview panel and, if an application is successful, staff and trustees with financial responsibilities. Those processing your personal information are required to treat it as confidential, and ensure its continued protection while in their possession.

Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information.

Our entitlement to process your personal information is governed under data protection law by a number of processing conditions. This means we may rely on more than one of these conditions in order to process elements of your personal information throughout the recruitment process. We will process your personal information, and sensitive personal information, where it is required by law or regulation, or it is in the legitimate interest of the applicant or our organisation.

Specific consent

Consent will be requested for pre-employment checks on candidates who have been selected for a role.

APPENDIX 2

Human Resources: (c) Referees

How do we collect information from you?

Your personal details have been provided to us by another person (the job / volunteering / trustee applicant) who has indicated you as a referee. We must have a legal basis for processing your personal data. We will only use your personal data in accordance with the terms of our privacy notice.

What type of information is collected from / held about you?

- name
- name and address of company, position and relationship to applicant (when providing an employment reference)
- personal address and relationship to applicant (when providing a personal or character reference)
- telephone number and email address.

How and why is your information used?

We will collect and process your personal data for the purpose of obtaining references for our applicant.

How long is your information kept for?

We will retain your personal data along with the applicant's data for as long as is necessary. Different regulations require us to keep different data for different periods of time, as below. Electronic data will then be deleted and paper data shredded.

Job applicants: If the applicant is successful the data will be transferred to their personnel file which will be kept for 6 years* after the end of their employment. (If unsuccessful after you have provided a reference the data will be kept for 6 months.)

Applications from potential volunteers: The volunteer's file is kept for one year* after cessation of volunteering. (Unsuccessful applications are destroyed after one year.)

Applications from potential trustees: The trustee's file is kept for 6 years* after standing down as a Home-Start trustee.

*In all cases, if an allegation has been made about the person, the file is kept for 10 years.

Who has access to your information?

Your personal information will be shared with our paid staff and, in employment situations, the shortlisting/interview panel, to enable us to proceed with the recruitment process. Those processing your personal information are required to treat it as confidential, and ensure its continued protection while in their possession.

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:

The lawful basis for processing your personal data is 'legitimate interest': it is a necessary part of our recruitment process and safer recruitment principles, helping to ensure that we are recruiting the most appropriate people for our organisation.

APPENDIX 2

Human Resources: (d) Employees

How do we collect information from you?

The information we hold about you is primarily information you provided when applying for your job, supplemented by information generated in the course of your employment.

What type of information is collected from / held about you?

- your name, address, contact details
- unique personal identifiers, e.g. date of birth, photographs
- your job application
- education history including professional qualifications and skills
- interview records and references
- job title, grade and salary
- your contract of employment
- supervision, reviews and appraisals
- disciplinary, grievance and capability procedures
- details of driving documents
- details of training undertaken
- time and attendance details
- bank account details for expenses, salary and pension purposes
- details of next of kin, for emergency use

Sensitive personal data

Some personal data is considered under data protection law to be 'special category data' for example, in relation to your health or ethnicity. We also use other data which you may consider to be sensitive, such as financial information. The information we hold is that which you provide to us (e.g. you may have given us information when you applied for your role, or in response to staff surveys)

Records may contain:

- individual demographic information in compliance with legal requirements (such as marital status, national identifier (e.g. National Insurance number), passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
- health information requiring adaptations to your working environment
- leaves of absence such as maternity leave, sickness absence, etc
- health and safety incidents, accidents at work and associated records.

How and why is your information used?

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative and legal obligations.

How long is your information kept for?

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. Data will be securely destroyed when no longer required. Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of employment and date of birth) to ensure that we do not contact you or process your data again inadvertently in future, and to maintain your record for employment record purposes.

We reserve the right to judge what information we must continue to hold to be able to fulfil our contract with you.

Who has access to your information?

Personal data, including sensitive personal data, may be shared with members of staff, and trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that special category personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without obtaining your consent. This will only occur in compliance with data protection law if it is necessary to protect your vital interests or the vital interests of another person, or for certain other reasons where it is not

possible or appropriate to gain your consent, such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations. We may disclose certain personal data to third parties. These third parties, and the purpose for sharing the information, are set out below:

- Relevant data may be shared with your next of kin but only with your consent or in an emergency
- Relevant data may be shared with the Home Office, UK Visas and Immigration, for the purpose of proving eligibility to work in the UK
- Data may be shared with reputable 'data processors' for the purpose of sending communications, e.g. staff surveys
- With your permission we may share information about you for publicity and marketing purposes online, in print and on social media.

Otherwise we do not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

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:

The lawful basis for processing your personal data is that it is necessary for the performance of your employment contract. There is a contractual requirement for you to provide much of the information detailed. Without this we are unable to fulfil our obligations, which could result in termination of contract.

March 2020