

Privacy Notice for Alana House Services

Alana House is one of PACT's community projects. PACT (Parents And Children Together) gathers information as part of this service and therefore acts as a data controller: this means it decides how your personal data is processed and for what purposes.

This privacy notice explains the types of personal data that we collect, how it is collected, how it is held, how we use it, and how it is processed. It also explains your rights under UK data protection legislation relating to your personal data. Further information about your rights can be obtained from the Information Commissioner's Officer or your local Citizens Advice Bureau.

Personal Data PACT collects:

Personal data is any information that can be used to identify you. PACT only collects personal data relevant to the involvement you have with us. We collect:

- **Contact details**, including full name, postal address, email address, phone number, mobile number.
- **Profile details**, including date of birth, a copy of your signature, whether you are on Probation or a Supervision Order, your ethnicity, languages spoken, learning difficulties, and nationality
- **Health data**, including whether you have a disability, to ensure support is accessible to you
- **Risk Assessment data**, including your level of risk to yourself, to children, to a known adult, to staff, or to the public.

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive personal information can include information about a person's health, race, ethnic origin, political opinions, sexual orientation, or religious beliefs or whether you have committed a criminal offence.

Why we need Your Personal Data:

1. To respond to your enquiry received via email or phone.

2. To subscribe you to the PACT newsletter.
3. To book you onto one of our groups.
4. To inform the assessment process.
5. To ensure we offer you an appropriate package of support.
6. To be able to request and share information with other professionals working with you, where appropriate or necessary.
7. To keep you informed of services and events that might be of assistance or of interest to you.
8. To assess how successful we have been in helping you and to report this to the organizations that are funding the work we do.
9. To record how we worked with you.

If PACT uses CCTV to keep service users and staff safe, we comply with the Information Commissioner's Office CCTV Code of Practice

The source of data we record about you:

The data that we record about you may come from yourself, Police, Social Services, and any other professional working with you such as third-party agencies.

The data that we record about you may be provided electronically, in the on-line referral form for example, or may be gathered from our contact with you.

The Legal Basis for Processing Your Data:

Under UK data protection legislation, we must always have a lawful basis for using personal data. At PACT we will rely on:

- Consent, for example to keep you informed about upcoming events that may be of interest to you, or to share your personal data with external partners.
- Performance of a contract, for example when assessing and delivering the most appropriate support package for you.
- Performance of a task carried out in the public interest, for example in cases where a safeguarding issue occurs, information will be shared with appropriate third parties, such as Social Services, and Thames Valley Police.
- Vital interests, in the case of an emergency where information about you would need to be shared with medical professionals, such as the Ambulance Service.



7 Southern Court, South Street, Reading, Berkshire RG1 4QS
 Freephone: **0300 456 4800** Telephone: **0118 938 7600** Email: **info@pactcharity.org** Online: **www.pactcharity.org**

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- In our legitimate interests, such as assessing how well we have helped you, providing insight and feedback on our services to our funding partners, and protecting the safety of our offices using CCTV recording.

Sharing Your Personal Data:

- Your personal data will be treated as strictly confidential and will only be accessible by members (staff and contractors) of PACT Communities team. We will only share your data with parties outside of the organisation with your consent or where we are obliged to do so for legal reasons, or if there is a safeguarding concern.
- Where it is appropriate and with your express permission, we will share relevant details with other professionals and organisations when we feel it will enhance the support, we can offer you. In exceptional circumstances such as reporting serious self-harm, posing a threat to others, or sharing serious issues such as abuse or exploitation we may share your information without express consent.
- To provide monitoring, and statistical reporting and benchmarking we will share anonymized data with third parties (e.g., commissioners) to comply with funding contracts.
- If we want to share your data with anyone who is not included in this list, we will inform you and, unless we have the legal grounds to share the data, we will seek your consent.

How do we keep your data safe and secure?

- Your personal data will be stored on a secure database or in locked cabinets and only accessible by PACT Communities team.
- We will not store your personal data on cloud-based systems located outside of the European Union.
- When we are required to transfer your personal data to a third party, such as, Social Services, we will do so by using our encrypted email system (Egress) or via CJSM if transferring data with the Police or Probation.

How long do we keep Your data?

Data will not be kept longer than necessary and according to our retention periods outlined below.

- Data will be kept electronically for **up to 6 years** from the date you stopped accessing support at Alana House.



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- If any data or documents of yours or relating to you are kept in physical files to help with progressing your support e.g. copy of court documents or Child Protection Plans, we will attempt to return these to you when you stop accessing support at Alana House and if this is not possible it will be securely disposed of **after 6 months** from the date you stopped accessing support at Alana House.
- In cases where an official complaint has been made or for safeguarding purposes, your data may be retained for longer.

The exceptions are:

- a) Counselling notes will be kept for a period of 7 years after the date you stopped accessing support at Alana House.

Once the retention date is reached, files will be securely destroyed. The only exception to this is where we are required, under the terms of our funding agreement to return files to the funder.

In cases where an official complaint has been made or for safeguarding purposes, your data may be retained for longer.

Your rights and Your Personal Data:

Unless subject to an exemption (under the GDPR), you will have the following rights with respect to your personal data:

- The right to be **informed** about how we process your personal data, as set out in this privacy notice.
- The right to request that PACT **corrects** any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is **erased** where we no longer have your consent or are required to retain your personal data.
- The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to **move, copy or transfer** personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
- The right to **restrict** processing in certain circumstances, for example if you question the accuracy of the personal data, we are processing about you, or in cases where PACT does not have a legal basis has to process your personal data.



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- The right to **withdraw** consent where we are relying on your consent to process your personal data.
- The right to **access** and be given a copy of your personal data which PACT holds about you.

In cases where we have applied an exemption to an individual right, we will explain the exemption in writing to you, and how it applies to the personal data that we are processing and to support offered by Alana House. If you have any questions about how we process your personal data, or in relation to this privacy notice, please contact the PACT data protection lead.

The right to lodge a complaint with the Information Commissioners Office. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Data Protection Lead – IT Operations Manager either by sending an email to info@pactcharity.org, writing to us at PACT Head Office, 7 Southern Court, South Street, Reading RG1 4QS or phoning us on 0300 456 4800.

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