

North Somerset People First Privacy Policy

North Somerset People First is a charity which provides self-advocacy, 1-1 advocacy, person centred planning and wellbeing services, training and community social inclusion projects to people who have a learning disability and/or associated condition including autism & aspergers.

Our core values are based on principles of trust, transparency and honesty. In order to fulfil these, people need to be confident that North Somerset People First holds the lawful and correct treatment of personal information as vital to our service delivery.

Our charity name is North Somerset People First

Our registered charity number is 1159184

Our registered address is The Campus, Highlands Lane, Weston Super Mare, North Somerset BS247DX

We are registered with the Information Commissioner's Office under reference 00010432792

Our contact details can be found at the bottom of this notice.

This Privacy Notice tells you what to expect when North Somerset People First (NSPF) collects personal and/or sensitive information. It applies to information we collect about:

- People who receive services/support from NSPF
- People who refer others into NSPF services
- Current and former employees, and people who apply for jobs.
- Current volunteers, and people who apply for volunteer roles.
- Visitors to our website
- People who provide feedback about our services including complaints.
- People who subscribe to our newsletters or information about our services or projects.

- Fundraising and Donations
- Social Networking

People who receive services/support from NSPF and people who refer others into NSPF services;

1-1 advocacy, person centred planning & well being services;

The main reason we ask for your information is to help you with your issue or problem. If you are referred for, or have support from NSPF, we will need to keep information. If you make a referral to our service we will also need to keep some information about you. This is called 'legitimate interests' so we can provide the right support and a good service to you.

Groups and events;

We need you to agree to us keeping your information (**consent**). We keep your information so that we can send you information about groups and events that you might be interested in.

We will only ask you for information that we need, and we will explain why we need it. We will ask for information that is relevant to the issue or problem. This may include;

- Your name and contact details – so we can keep in touch with you
- Information like your gender, ethnicity, age
- Details about the issue you want support with.
- Your views on what is best for you a friend or relative we are supporting

If you don't want to give us certain information, you don't have to.

Where do you store my information?

Information that we keep on paper will be kept in a locked filing cabinet.

Staff might keep your name, address and phone number in their work mobile phone so that it is easy to contact you. The mobile phone will always need a passcode so that it cannot be accessed by anyone else.

Information that we keep on a computer will be kept safely. All computers need a password.

NSPF uses Microsoft Office 365 for our emails and to store information.

You can read the Microsoft Privacy Statement here:

<https://privacy.microsoft.com/>

Sometimes we send emails using a secure email system called Egress.

You can read the Egress Privacy Statement here:

<https://www.egress.com/privacy-policy>

How we use your information;

The main way we use your information is to help you with your issue or problem. We might also use your information to;

- Get feedback from you about our service while we are working with you (we will not pass your details to anyone else for this reason without your permission)
- Create anonymous case studies to raise awareness of our services
- Prepare statistical reports for our funders about the work we do – this would not be able to identify you.
- Help us improve our services by looking at our statistics
- Investigate a complaint

How long will you keep my information?

1-1 Advocacy/person centred planning & well being service;

When your file is closed the information will be safely stored by us for 2 years. We will not view or make changes to your information unless you get back in touch with us.

Groups & events;

Your information will be stored whilst you are actively engaging in groups and events. If you have not attended and group or event for a 12-month period your information will be deleted – this means any information we have for you will be safely destroyed.

Can I see the information you have about me?

Yes, you have the right to access any information we have about you. We may need to remove any 'third party' information (about other people) which may be in your file. If you would like to have a copy of your file, please get in touch with us using the contact details below. We will send your information within 30 days and there is no charge for this.

What if I think the information is wrong?

We will consider the reasons why you think information is wrong. We will either change the information we hold, or make a note that you think information is wrong on your file, and what you think should be written down instead. We

will let you know what we have done and the reason why. You have the right to ask us not to 'process' or use your information until this is done.

What happens if I want you to delete my information?

You can contact us and ask. There are some circumstances where we may not be able to do this but we will always tell you why. If we cannot delete your information, you can ask us not to 'process' or use your information. We will explain to you how this would affect any support you get from NSPF.

Can you share my information?

Usually we would only share your information if you give us permission. This might be if we cannot help you with an issue and need to refer you to another service – for example if we contact a debt advice agency for you we might need to tell them your contact details and a summary of your problem.

We might also share your information if you have given us consent to speak to another person (for example a social worker or doctor) about your issue.

If our contract to provide services with an external funder ends, you have the right to have your information transferred on active cases to a new provider.

Either the external funder or we would ask for your permission to do this. This is called 'data portability'

Sharing your information without your permission;

There may be times when we have to share your information without your permission.

- If something you've told us makes us think you or someone else are at serious risk of harm we might need to tell the police or social services.
- To comply with the law, called 'legal obligation' - for example if a court orders us to share information
- To protect someone's life, called 'vital interests' – for example sharing information with emergency services in an emergency
- To carry out our work as an organisation, called 'legitimate interests' – for example anonymous statistics and case studies for funders and raising awareness.
- To defend our legal rights – for example to resolve a serious complaint.

If your information is seen, or told to someone who is not authorised to see it, this is called a 'data breach'. If this happened to your information we would tell you as soon as possible and let you know what we were going to do about it. We would also tell the Information Commissioners Office about it. We would tell you about your right to make a complaint to the Information Commissioners Office.

Current and former employees, and people who apply for jobs:

Job and volunteer applications;

North Somerset People First is the data controller for the information you provide when you apply for a job or volunteer role with us. All of the information you provide during the application process will only be used to progress your application, or to fulfil legal requirements.

The information you provide will be stored securely by us. This includes both electronic and paper format.

We will ask you for;

- Contact details – so that we can contact you about your application
- Previous experience, education, referees and answers to questions relevant to the role – so we can assess your suitability for the role.
- Equal opportunities information – for example your gender, ethnic origin, age etc. This is not compulsory and is not used to assess your application. We ask for this on a separate document, which is not shared with the shortlisting or interviewing team. We ask for this information so that we can analyse equal opportunities data.

Shortlisted applicants;

If your application is shortlisted, we might ask you to attend an interview, which may involve some tests or presentations. We will also carry out some pre-employment checks at this stage. You will be asked to bring to your interview;

- Proof of identity and your right to work in the UK – you will be asked to bring original documents and we will take copies (for example your passport)
- Proof of any qualifications required for the role

The interviewing team will take notes during the interview so that they can score your answers to the interview questions. We ask all interviewees the same questions. After the interview, these notes are stored securely by our Business & Finance Manager.

Unsuccessful Employment Applicants;

If you are not successful in your application for the role you have applied for, we might ask you if you would like us to retain your details securely for 6 months so that we could contact you with any suitable vacancies during this period.

If you are not successful, and you do not want us to contact you with suitable vacancies, we will keep your application and notes from your interview for 6 months from the date of your interview. They will then be

securely destroyed. We will destroy any copies of identification and qualification documents within 5 working days of informing you that you have been unsuccessful.

Successful Employment Applicants;

If we make an offer of employment, we will ask for information to carry out further pre-employment checks. These must be completed before you can start employment with NSPF. We will ask for:

All employees who have unsupervised contact with vulnerable adults, or anyone under the age of 18 must hold a valid enhanced Disclosure and Barring Service (DBS) check. We will support you to obtain this by processing your application for a DBS check. You will be asked to provide your address history, and details of any criminal convictions.

- We will contact your referees directly, using information you provide in your volunteer application, to obtain references
- Your bank details to enable us to process salary payments and to reimburse expenses incurred on company business.
- Emergency contact details –so we know who to contact in case of an emergency whilst you are at work.
- Your car insurance details (if you use your own vehicle for work purposes)

Volunteer Applications;

If your application is shortlisted, we might ask you to attend an interview, or informal discussion.

The interviewing person or team will take notes during the interview so that they can assess your answers to the interview questions.

Unsuccessful applications;

If you are not offered a volunteer role, we will keep your application and interview notes securely for 3 months.

Successful volunteer applications;

If you are offered a volunteer role, we will ask you for further information. This will be:

- Proof of your identity. You will be asked to provide original documents and we will take copies.
- All volunteers who have unsupervised contact with vulnerable adults, or anyone under the age of 18 must hold a valid enhanced Disclosure and Barring Service (DBS) check. We will support you to obtain this by processing your application for a DBS check. You will be asked to provide your address history, and details of any criminal convictions.

- We will contact your referees directly, using information you provide in your volunteer application, to obtain references
- Your bank details to enable us to reimburse any out of pocket expenses you may incur whilst carrying out your volunteering role.
- Emergency contact details –so we know who to contact in case of an emergency whilst you are volunteering with us.
- Your car insurance details (if you use your own vehicle as part of your volunteering role)

Sharing information about employees;

We may use workplace pension providers to provide services associated with recruitment and employment. These are data processors. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

There are times when we might have to share your information **without your permission**. If we do, we will always make sure there is a legal basis for us to do that. For example, if we receive a court order, we have to produce information demanded in that order.

Sharing information about volunteers;

There are times when we might have to share your information without your permission. If we do, we will always make sure there is a legal basis for us to do that. For example, if we receive a court order, we have to produce information demanded in that order.

Storing and Retaining Information about Employees;

The information employees provide during the application process will be retained by us as part of your personnel file throughout the duration of your employment, plus 6 years following the end of your employment. This will include criminal records declaration, references, DBS check results and updates. During the course of your employment we may collect further personal or sensitive information (for example driving licence details, results of occupational health assessments). This information will also be retained for the duration of your employment plus 6 years following the end of your employment.

Storing and Retaining Information about Volunteers;

If you volunteer for us, the information you provide during the application process will be retained by us as part of your volunteer file for the duration of your volunteering, plus 6 years following the end of your role with us. This will include your criminal records declaration, DBS check results (and updates)

and references. This information will also be retained by us for the duration of your volunteering plus 6 years following the end of [your role with us](#).

Accessing the information we hold about current and former staff or volunteers, and people who apply for these roles;

Under data protection laws, you have a right to access the personal information we hold about you. For current staff and volunteers, this information will be made available following a request made to the Business & Finance Manager.

If you are no longer employed by NSPF or have stopped volunteering with us, you can request a copy of the information we hold about you and we will provide that to you as quickly as we can but certainly within one month of us receiving the request. This is called a Subject Access Request.

If we hold inaccurate or incomplete information about you, please tell us and we will correct or complete the data. If we have shared that information with anyone else, in the circumstances we have outlined above, we will, where possible, inform them of any corrections and tell you where this has happened. This is called your right to rectification.

In some circumstances, you have a right to erasure. We have already explained how long we keep your personal information. At the end of that period, when we no longer have any reason to keep or process it, we will delete it from our systems.

You have a right to restrict processing in some circumstances. This means that in those circumstances, we would still store your information but not process, or use it. These are the situations where you can ask us to restrict processing your information:

- Where you believe that the information we hold is not accurate, we would restrict processing until we have verified the accuracy of the personal information;
- If we have used your information unlawfully, and you don't want us to erase the information, you can ask us to simply hold it instead;
- If we no longer need the personal information and before we automatically delete the information from our system, you request us to hold it to make or defend a legal claim.

If your information is seen or told to someone who is not authorised to see it, this is called a 'data breach'. If this happened to your information we would tell you as soon as possible and let you know what we were going to do about it. We would also tell the Information Commissioners Office about it. We would tell you about your right to make a complaint to the Information Commissioners Office.

Visitors to our website;

Our website uses 'Cookies'. These are small text files that are stored by the internet browser (for example Google Chrome or Safari) on your computer, laptop, mobile phone or tablet. Cookies provide non-personal tracking data, and help us to optimize the way our website works for our users. Cookies identify your Internet browser, the type of operating system you use, your IP address and the domain name of your Internet service provider, and this non-personal information may be used by us for internal purposes, including but not limited to using third party applications such as Google Analytics to analyse what sorts of users are using our site, and improving the content of our website pages for those users.

For further information about Cookies, and for guidance on removing them from your machine, please visit the [All About Cookies](#) website which provides information about Cookies and their removal on all modern browsers.

If you use the 'contact us' or 'Referral' form on the website, the information you provide is stored securely and used to work out the reason for your enquiry/referral. If your enquiry means that you need further contact from us, for example you need advocacy support, or want to give us some feedback, your information will be used, stored and retained as we describe in the relevant sections of this Privacy Notice.

If you make a referral using our online form, the information you provide will be used, stored and retained as we describe in the '*People who receive support from NSPF and people who refer others into NSPF services*' section of this Privacy Notice.

Links to third party add co-branded websites

NSPF has established relationships with reputable partners that allow visitors to our website to link directly to sites operated by these partners. Some of these sites may be "co-branded" with a NSPF logo; however, these sites are not operated or maintained by NSPF. These sites may collect personal information from you that may be shared with NSPF. As noted above, this Privacy Policy will apply to any personal information we obtain in this manner.

Links to third party sites do not constitute sponsorship, endorsement or approval by NSPF of the content, policies or practices of such third party sites. Once you have left the NSPF site via such a link, you should check the applicable privacy policy of the third party site.

People who provide feedback about our services including making complaints;

When you provide feedback to NSPF, or if you make a complaint about our services, we ask you for your contact details so that we can get in touch about the feedback that you have left. We will only get in touch with you if you ask us to or give consent.

Where do you store my information?

Information is stored on our secure service management system. Some information might also be kept in our secure email system (Microsoft Office 365) or (Egress)

All our staff are trained on how to keep your information safe.

How we use your information;

The main way we use your information is to help investigate and resolve your complaint and use your feedback to think about how we can improve our services.

We also feedback to our funders and commissioners about complaints and feedback we have received, but this would not be able to identify you.

How long will you keep my information?

The information will be safely stored by us for 2 years. We will not view or make changes to your information unless you get back in touch with us.

Can I see the information you have about me?

Yes, you have the right to access any information we have about you. We may need to remove any 'third party' information (about other people). If you would like to have a copy of your information, please get in touch with us using the contact details below. We will send your information within 30 days and there is no charge for this.

What if I think the information is wrong?

We will consider the reasons why you think information is wrong. We will either change the information we hold, or make a note that you think

information is wrong, and what you think should be written down instead. We will let you know what we have done and the reason why.

What happens if I want you to delete my information?

You can contact us and ask. There are some circumstances where we may not be able to do this but we will always tell you why.

Can you share my information?

We might share your information if you have given us consent to speak to another person about your complaint or feedback.

Sharing your information without your permission;

There may be times when we have to share your information without your permission.

- If something you've told us makes us think you or someone else are at serious risk of harm we might need to tell the police or social services.
- To comply with the law, called 'legal obligation' - for example if a court orders us to share information

- To protect someone's life, called 'vital interests' – for example sharing information with emergency services in an emergency
- To carry out our work as an organisation, called 'legitimate interests' – for example anonymous statistics and case studies for funders and raising awareness.
- To defend our legal rights – for example to resolve a serious complaint.

If your information is seen or told to someone who is not authorised to see it, this is called a 'data breach'. If this happened to your information we would tell you as soon as possible and let you know what we were going to do about it. We would also tell the Information Commissioners Office about it. We would tell you about your right to make a complaint to the Information Commissioners Office.

People who subscribe to our newsletters or information about our services or projects;

You will only be sent our newsletters or information about our services if you have asked us to send them. We do not use your information for any other purpose. The information you share with us is stored on our secure service management system. We do not use another provider to send our information – it is sent directly from North Somerset People First.

We do not share, rent or sell any contact details provided to us.

You can unsubscribe to receiving our newsletter or information about our services at any time.

You have the right to ask us to stop using or storing your personal information. If you unsubscribe from our newsletter, and do not use NSPF for any other support or services, we will permanently delete the personal information we hold about you. If you access NSPF in any of the other ways described in this Privacy Notice, we will hold your information according to the relevant section.

If any of the personal information we hold about you is incorrect, you have the right to ask us to correct it.

You have the right to know what personal information we hold about you. If you want to know, you can make a Subject Access Request to the Business & Finance Manager whose contact details are at the end of this privacy notice.

Fundraising and Donations

If you tell us you want to fundraise to support our cause, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts.

Charity Commission rules require us to know where funds have come from, as well as any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors who've made, or are likely to make, a significant donation to North Somerset People First

As part of this process we'll carry out research using publicly available information and professional resources.

Where we have your permission, we may invite you to support our work by making a donation, buying a raffle ticket, getting involved in fundraising activities or leaving a gift in your will.

If you make a donation, we'll use any personal information you give us to record the nature and amount of your gift, claim Gift Aid where you've told us you're eligible, thank you for your gift or let you know if you have won a raffle prize. If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems.

Some donations you make will be eligible for Gift so that we claim Gift Aid on your behalf.

For NSPF to claim Gift Aid on your donation, you must currently pay Income Tax equal to or more than the amount of tax which will be reclaimed on your donation. The payment of other taxes such as Council Tax and VAT does not qualify.

As part of this process NSPF is required to submit your details including your address to HMRC, and in asking us to make a Gift Aid claim you are giving us permission to use your personal details in this way.

If you use your credit or debit card to donate to us those payments are currently processed by secure third-party websites:

<https://www.justgiving.com>
<https://www.easyfundraising.org.uk>

Any donation eligible for gift aid using any of the third-party sites will be processed by the third-party and not NSPF

We do not receive any credit or debit card details of your transaction. Please review the Privacy Policy of each provider should you wish to know how they manage your personal information. Or contact us for more details (contact details below).

If we receive an email containing any credit or debit card details, it will be immediately deleted, no payment will be taken and you will be notified about this. All donations should be completed through the online pages above or cheque made payable to North Somerset People First by post or cheque or cash in person to NSPF office.

The Campus

Highlands Lane
Weston Super Mare
North Somerset
BS24 7DX

Social Networking

NSPF uses social networking sites such as Facebook, Twitter and Instagram to share news about our services, events and information.

The Sites may offer you the opportunity to share or follow information about us (or the Site or our services) using third party social networking functionality (such as through “share this”, “like” or “follow” buttons).

We offer this functionality in order to generate interest in us, the Site and our services among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about us with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly-available, including through Internet search engines. Please note that we do not exercise any endorse or control the policies or practices of any third party social network whose functionality you may access through the Site. You should always read the privacy policy of any social network through which you share information carefully in order to understand their specific privacy and information usage practices.

If you want to get in touch with us about the information we hold about you;

- You can call us on 01934 426086 and ask for the Business & Finance Manager
- You can email info@nspf.co.uk
- Contact us via our website www.nspf.co.uk
- You can write to us;

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