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PATRON- Roger Jefcoate CBE DL

CEDA Privacy Policy

This is our new, updated privacy policy, which came into effect on **25 May 2018**.

At CEDA, we are committed to respecting your privacy and protecting your personal information.

We promise to respect all personal information that you share with us, or we receive from other organisations, and keep it safe. We will be clear when we collect your personal information and we will not do anything you would not reasonably expect us to.

This privacy policy, together with our terms and conditions and cookies policy, will explain how and why we use your personal information, to ensure you remain informed and in control of your information.

So that CEDA can provide services to the people we support we collect and use certain personal information about you.

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed (anonymous data).

The data that CEDA holds is managed in line with the General Data Protection Regulation (GDPR), which applies in the United Kingdom and across the European Union which sets out our obligations to you and your rights in respect of how we manage your personal information.

CEDA will ensure that the personal information we hold about you is:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes

- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

If you have any questions about this privacy promise or would like further explanation as to how your personal information is managed then please contact us, see details at the end of this policy.

Information collected by CEDA

When you enquire about our services through our website, phone, email, post, face to face or social media, and during the course of providing services to you we collect the following personal information when you provide it to us:

- Your name, home address, date of birth and contact details (including your telephone number, email address) and emergency contacts (i.e. name, relationship and home and telephone numbers)
- Information about your disability and any conditions that would be necessary for us to know in order that we provide appropriate and safe services
- Your likes, dislikes and lifestyle preferences (including your religious beliefs or other beliefs of a similar nature, racial or ethnic origin, politics, genetics, health, sex life, marital status and sexuality trade union membership or biometrics (so far as they relate to providing you with suitable services)
- Financial information regarding how payment will be made to CEDA
- Your feedback and contributions to questionnaires and surveys about the service we offer
- Your complaints, compliments or concerns about the service we provide
- Any accidents and incidents or near misses you may have been involved in whilst on our premises or whilst in our care – this may include details of injuries and treatment you may have received
- Any safeguarding or welfare concerns
- Your image can be captured on CCTV which is in operation around the Clare Milne Centre

When using our website, we collect standard internet log information (commonly known as cookies), including:

- IP address
- Details of the pages you visit

- General details about the type of computer or device that you are using

The personal information we gather through our website is for statistical information only which we collect in order to find out the numbers of visitors to our site and the pages they have visited. This information is collected in such a way that it is not used to identify individuals. Where we do collect personal information on the website, this will be made obvious to you through the relevant pages. See our full cookie policy for more information.

Please be aware that our website may provide you with links to other websites. If you follow a link to any other website please note they have their own privacy promises. We do not accept any responsibility or liability for the privacy and security practices of such third-party websites and your use as such is at your own risk.

We work closely with third parties such as social and healthcare professionals, schools and public bodies. We therefore also obtain personal information about you from other sources such as:

- Your disability and any conditions you may have that we need to know about in order to provide safe services to you, we may gather information from any appropriate external social or health care professionals, including your GP and school if relevant
- Your name, home address, date of birth, contact details, needs assessments
- Your likes, dislikes and lifestyle preferences (including your religious beliefs or other beliefs of a similar nature, racial or ethnic origin, politics, genetics, health, sex life, marital status and sexuality trade union membership or biometrics (only so far as they relate to providing you with suitable services) from your family, friends and any other person you have nominated as your representative
- Your legal representative (for example Lasting Power of Attorney), if applicable

We use your personal information to:

- Prepare, review and update suitable care and service plans, describing the nature and level of support for services which you have requested that we supply to you
- To communicate with you, your representatives and any appropriate external educational, social or health care professionals about your individual needs and personalise the service delivered to you

- Make reasonable adjustments, when required, to meet your individual needs and to ensure we have suitable facilities to ensure your safety
- Invoice you for the services you have received in accordance with our terms and conditions
- Processing financial transactions such as payments for services, donations, this includes processing gift aid with HMRC if relevant
- Carry out quality assurance procedures, review our service and improve our customer experience (please note that feedback can also be provided anonymously)
- Send information about our services which we believe you may be interested in. You may unsubscribe from this at any time
- Notify you about changes to our services which are relevant to you
- Monitor how effective our services are and to make sure that the services we provide meet your needs
- Improve your experience of our website and to ensure that the content is presented in the most effective way
- Report safeguarding or criminal or suspected criminal activity to the police or relevant authorities.

Use of children's data

We are committed to protecting the privacy of children and young people that engage with us, whether through our website or where we provide services to children young people.

We collect and store personal information about children and young people where we are contracted to provide support service to them. We are required to process this personal information in order to fulfil the requirements of the service contract and to meet our regulatory obligations. Consent to hold and process data must be given by a parent or guardian for anyone under the age of 16.

Who we share your personal information with

We may share information about you and the services we deliver to you with appropriate external social or health care professionals, school or educational establishments and any individuals you have nominated as your representative as and when required. This data sharing enables us to provide the right services and support that you need.

We will share personal information with law enforcement or other authorities if legally required to do so. This includes information required by public bodies to

evidence our compliance with the applicable regulatory framework. We are also required to share personal information with external social or health care professionals, including public bodies and local safeguarding groups (in some circumstances) to ensure your safety.

We will share minimal and relevant information within CEDA in order to provide safe and effective services to you.

We will not share, sell or trade your personal information with any other third party without your consent.

Electronic data and databases are stored on secure computer systems and we control who has access to them. Our staff receive data protection training and we have data protection policies and procedures in place which teams are required to adhere to.

We regularly review who has access to information that we hold to ensure it is only accessible by trained staff and contractors.

In order to deliver our service to you we rely on third parties to provide specialist support to us. To provide this support they will have access to, or a duty of care over your personal information. These providers are:

- IT and Telecoms Support companies – to ensure the safe, secure and resilient operation of our IT infrastructure including computers, servers, phones and mobile devices
- Software support companies – to provide specialist support and resolve issues with the software that we run, for example the systems we use to store and manage your customer records
- Data archiving companies – responsible for the secure storage and destruction of records.

These providers are under a written contract to ensure the same level of privacy and security that we promise to you.

Whether information has to be provided by you, and if so why

Information regarding your disability and any other relevant conditions is necessary to enable us to create a care plan and to provide you with suitable services. Without this information, we will not be able to assess your support needs or provide any services to you.

How long your personal information will be kept

- We will hold the personal information kept within your electronic customer file for the length of your contract plus 3 years, for children this will be until the young person reaches the age of 24 and has left our services for 3 or more years
- We will hold the personal information kept within your hard copy customer files for 3 years from the date of the last entry
- We will hold the personal information kept within our feedback procedure for 2 years so that we can identify trends and patterns in our service
- We will hold financial records and transactions for 7 years in line with our legal requirements
- All safeguarding records will be held indefinitely

Reasons we can collect and use your personal information

We rely on the following grounds within the GDPR:

- Article 6(1)(a) – processing is conducted with your **consent** to process personal data for specified purposes
- Article 6(1)(b) – processing is necessary for the performance of our **contracts** to provide individuals with care and support services
- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with our **regulatory framework** and the law
- Article 6(1)(f) – to process your personal data in pursuit of **legitimate interests**, which include;
 - Marketing purposes – the privacy impact on you is expected to be minimal. Marketing will be specific to services we believe are of interest to you using information from enquiries we receive from you, you can unsubscribe at any time
 - Corporate due diligence and financial modelling, service development and innovation – the privacy impact on you is expected to be minimal. We will process your data internally to ensure our business is stable, trusted and innovating to provide the best possible service to you

GDPR recognises that additional care is required when processing special category (sensitive) data such as your health. We process this under the following grounds within GDPR;

- Article 9(2)(h) – processing is necessary for the provision of social care or the management of social care systems and services

International transfers

- All your personal data is stored and processed on systems that are within the European Economic Area (EEA) and offer the same level of legal protection and rights over your data.

Your rights

Under the GDPR you have important rights free of charge. Those include rights to:

- Fair processing of information and transparency over how we use your use personal information
- Access to your personal information and to certain other supplementary information that this Privacy Promise is already designed to address
- Require us to correct any mistakes in your information which we hold
- Require the erasure (i.e. deletion) of personal information concerning you, in certain situations. Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to provide support services to you
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Object in certain other situations to our continued processing of your personal information
- Otherwise restrict our processing of your personal information in certain circumstances
- Claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

How to contact us

You can contact us by:

- Email info@cedaonline.org.uk
- Post – Data Protection Officer, CEDA, The Clare Milne Centre, Emperor Way, Exeter Business Park, Exeter, EX1 3QS
- Telephone – **01392 360645**

If you would like to exercise any of those rights, please:

1. Contact us using the details above – making clear that you wish to exercise one of your privacy rights
2. Let us have enough information to identify you (e.g. your name and address). We may ask you for additional identification if we do not know you.
3. Let us know the information to which your request relates

If you would like to unsubscribe from any marketing emails you can also click on the 'unsubscribe' button at the bottom of the marketing emails. It may take up to 14 days for this to take place

Keeping your personal information secure

The confidentiality and security of your information is of paramount importance to us. We have appropriate organisational and technical security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the

Information Commissioner who may be contacted
at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

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Do you need extra help?

If you would like this privacy promise in another format (for example, in audio, large print or braille) please contact us.