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Data Privacy Protection Policy

1. About this Policy

1.1 This policy explains when and why we collect personal information about our users and staff , how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website www.glachbeg.org.uk for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are Glachbeg Croft Centre. The person responsible is Robert Bull We can be contacted at:

Glachbeg, Allanglach Wood, North Kessock, Inverness. IV1 3XD

Email address :-info@glachbeg.org.uk

2.2 Our registration number for Data protection is hojogohjgojogopihuhjrnjbgbjhmbhkgh

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3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Placements and staff name, address, telephone numbers, e-mail address(es).	Managing the persons placement or employment	Performing Glachbegs contract with users and staff For the purposes of our legitimate interests in operating the Business
The names and contact details of those referrers and professionals who are partners in the delivery of programmes here.	Ensuring that the Highland Practice Model is implemented for children and adults on placement	For the purposes of our legitimate interests in operating the business
Photos and names of staff	To share with people on placement and their associated staff	Consent. We will seek staff consent on their application form . They may withdraw their consent at any time by contacting us by e-mail or letter.
Photos and videos of staff and placements	Putting on the website and social media pages and using in press releases	Consent. We will seek the users/ staff consent on their application form . They may withdraw their consent at any time by contacting us by e-mail or letter.
Names. Addresses, and personal details as recorded in application forms for placements.23/04/2018	To inform the programme of individual people on placements.	Performing Glachbeg's contract with the referring individuals or agencies For the purposes of our legitimate interests in operating the Business



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Personal details, such as those in a Childs Plan or adult placement meeting notes	Managing a placement to ensure that Best Interest decisions are taken in conjunction with referrers. To include information for meetings	Performing Glachbeg's contract with the referring individuals or agencies For the purposes of our legitimate interests in operating the Business
Staff name , address, e-mail address , telephone number. NI number and bank details	Managing payroll.	For the purposes of our legitimate interests in operating the Business

4. How we protect your personal data

4.1 We will not transfer your personal data outside Glachbeg without your consent unless this is to referring partners or others involved in support through NHS or the Highland Council .

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.



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5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we will have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as your placement continues and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances



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(e) to object to or restrict how your personal data is processed

(f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF