

# Families InFocus (Essex) – Privacy Policy (Notice)

## 1. Introduction

Families InFocus (Essex), registered charity number 1062311 and registered company number 3287829 is committed to protecting your privacy. At all times we aim to respect any personal information you share with us, or that we receive from others, and keep it safe.

Families InFocus (Essex) is registered as a data controller under the Data Protection Act 1998. We recognise that the lawful and correct treatment of personal data is of paramount importance. We comply with the Data Protection Act 1998 and will comply with subsequent legislation e.g. the new General Data Protection Regulation (GDPR), which comes into force on 25th May 2018.

## 2. Information about you

We may obtain personal information from you for a variety of different reasons, for example when you enquire about the charity and how we can help; to register as a service user; become a member (voting); donor or other interested party; or to seek employment or become a volunteer.

Information may be collected through various contact methods e.g. when you communicate with us by phone, email, letter or application, through our website or during home or other visits.

Information collected and stored may include names, addresses, phone numbers, e-mail addresses, special categories of sensitive personal data e.g. ethnic origin, nature of child/young person's disability, information relating to your child's education.

From time to time this may also include reports and other information from professionals (across education, health and social care) and other organisations linked to the child or young person.

## 3. Our use of this information

### **Service Users (clients and family members) and Members (voting):**

Your personal information will only be used to process your requests, to provide you with information, advice and support across our range of services, to provide information which we think you may be interested in, and to keep members up to date with the organisation's activities and progress.

We may also contact you to seek your opinion on the services that we provide or on our proposals to change and improve these in the future.

In line with the GDPR, we are requested to comply by informing you of the “lawful basis” to use your personal information, including children’s data. We consider this is for “**legitimate interest**” purposes so that Families InFocus (Essex) can carry out its work, pursuing our aims and mission, in supporting Essex families with children and young people with any special educational need or disability (SEND).

Where we obtain any special category information e.g. ethnic origin, nature of child/young person’s disability, processing is carried out in the course of our **legitimate activities**, in compliance with the requirements of GDPR Article 9.

The GDPR allows us to collect and use your personal information if it is reasonably necessary to achieve our legitimate interests (as long as that use is fair, balanced and does not unduly impact your rights).

When we use your personal information to achieve such legitimate interests, 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 for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted by law).

Information held by Families InFocus (Essex) may also be used for monitoring, analytical and statistical purposes, but personal data will always be anonymised unless explicit consent from the data owner is obtained.

#### **Supporters and other interested parties:**

Where you have provided your **consent** for us to use your personal information in a certain way. For example, we will ask for your consent to use your personal information to send you regular e-bulletin updates.

You can change this consent and opt-out of these communications at any time by following the ‘unsubscribe’ link provided at the bottom of all emails.

#### **Other purposes:**

Where necessary so that we can comply with a **legal obligation** to which we are subject. For example, where we are obliged to share your personal information with regulatory bodies which govern our work and services.

Where necessary for the performance of a **contract** to which you are a party or to take steps at your request prior to entering a contract.

#### 4. Who might we share your information with?

We will not pass on any personal information to other individuals or agencies unless we have your explicit consent or are required by law to do so.

#### 5. What security measures we have in place

We are committed to ensuring that your information is secure. We have appropriate and proportionate security policies and organisational and technical measures in place to help protect your personal information.

Your personal information is only accessible by appropriately trained staff, trustees and volunteers. In order to prevent unauthorised access or disclosure, we use encrypted cloud data base, electronic systems and managerial procedures to safeguard and secure the information we collect.

#### 6. How long we keep your information for

We will keep your data for as long as it is necessary to provide the services that you have asked for, and to meet our legal obligations e.g. to HMRC and other accounting regulations.

For service users, we will keep your data until the youngest child, for whom support is required, reaches the age of 25, unless an earlier request is received to remove from our records.

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing purposes, or to unsubscribe from our email distribution list.

#### 7. What are my rights?

You also have the following rights:

**Right of access:** You can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.

**Right of erasure:** You can request that we delete your personal information from our records as far as we are required to do so.

**Right of rectification:** If you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate.

**Right to restrict processing:** You have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate use.

**Right to object:** You have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests basis (see section 3 above), (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.

## **8. Links and Third Parties**

We may link our website directly to other sites. This Policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

## **9. Who can I Contact about Data at Families InFocus (Essex?)**

If you have questions about privacy or have a concern or complaint about our handling of personal data, you can contact our Data Protection Lead, Rachel Ellis, CEO, who will investigate the matter. Please email her at [rachel@familiesinfocussessex.org.uk](mailto:rachel@familiesinfocussessex.org.uk) or write to her at Families InFocus (Essex), Lancaster House, 140 Mildmay Road, Chelmsford, Essex, CM2 0EB.

## **10. Changes to This Policy**

We may update this Policy from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an updated Policy on our website. This Policy was last updated on 14 May 2018.