



General privacy notice for people we support through PSS

At PSS we know that your privacy is very important to you and it's just as important to us too. This is the 'privacy notice' which tells you how we plan to respect and look after your personal information.

1. How we collect personal information about you

When you give it to us directly: we will collect personal information directly from you, when you make an enquiry with us, tell us information about yourself as part of an assessment, development of a support plan, risk assessment or a review. We usually do this in person with you when we meet with you.

When you give permission to other organisations to share it: we may have received information on your behalf from another organisation or professional; for example when we received a referral from a social worker, or when other providers share information.

Children's data: we do work with children and young people, who may be classed as 'vulnerable individuals' and require specific protection under the law. We will always make sure we have a good reason to collect children's information.

2. What personal information do we collect?

The personal information we collect would include details such as your name, date of birth, email address, postal address, and phone number. We may also collect information about other people in your life, such as your next of kin or emergency contact details.

Some information such as ethnicity, religion and health information is called 'special category data'. We have a legitimate interest to collect this; but also to make sure that we don't discriminate against you and that we provide you with the best service and support possible. We will only collect the information we absolutely need to provide you with a service and to support you.

3. Why we need your information?

Our legal basis for having your information, is because we have a legitimate interest to do so in order to deliver our services and to support you. In managing your information we will always make sure your rights and interests are our priority.

Where we need to collect your special category information, for example regarding your health and social care support needs, we do so because the information is needed for us to support you as your social care provider.

Specific reasons we need your information are:

- To make sure that we fully understand what support you want and need and can support you in the best way possible for you
- To make sure that we can support social care assessments and early help assessments where relevant
- To be able to contact you and the important people in your life
- To manage our relationship with you during your time with PSS - including understanding if your needs change, what you want to achieve or any issues or concerns that you have
- To make sure that we are fair and don't discriminate against you in any way; and can respond to any concerns that you might have
- To help keep you safe and protect you from any potential harm



We will also use it to:

- Keep you updated with information about changes to the service and support you receive, or PSS as a whole
- Contact you for feedback to help us improve your service
- Produce annual reports and statistics about what we do at PSS
- Provide you with important advice and support relating to your service or support that might have an impact
- Tell you about opportunities that may be of interest that PSS are providing through the service you access
- Help us to identify you when you contact us and make sure that we can keep our records up to date

We may also need to receive written consent from you to use your information for a more specific purpose and will always make sure we get this consent and explain why it is needed (eg consent to take photographs or videos). Under the law in the UK, a child aged 13 or over is able to provide their own consent for us to handle their information; otherwise, we will seek consent from a parent and guardian where possible and appropriate. You will have the right to withdraw this consent at any time.

If you don't think we have a good reason to use your data in the ways explained above, you have a right to ask us to stop using it Please see section seven of this notice.

4. What we will and won't do with your personal information

- We will always work hard to keep your information safe.
- We may share your data with other agencies or organisations where we need to do so (eg the local authority, police, health professionals, school/college etc). Again, we will make sure that we have a clear and lawful reason whenever we do this.
- On rare occasions, we will also share some of your information with professionals who assist us in our organisational regulatory and administrative functions, for example our auditors, inspectors from the Care Quality Commission (CQC), Care Inspectorate Wales (CIW) and insurance providers, but only when absolutely necessary.
- We may need to disclose your information if required to do so by law. We will always try to discuss this with you before doing this and explain why we are doing it, but sometimes we will be unable to inform you that such disclosures have been made.
- We may also need to disclose your information if there are concerns about your safety or wellbeing. Your safety is really important to us, and we may need to share or disclose information if we believe there is a real risk to you, or if you pose a risk to others or yourself. This may mean sharing information with the local authority, the police or family members. Where it is appropriate to gain your consent first before sharing information, we will always try to do that.
- We may choose to delete posts on social media which contain information of a sensitive nature.

We will never:

- Sell or share your personal information with organisations so that they can contact you for any marketing activities
- Sell any information about the PSS website you use, eg selling information to social media providers so they have information about your interests
- Share your information with people who don't need access to it

5. Who sees your personal information?

The personal information we collect about you will be used by the PSS staff who work with you so that they can make sure that we can provide your support. This information may also be available to others involved in your support such as student social workers, volunteers, and staff in central services such as the quality team who carry out quality audits which help make sure our services are providing good quality support. We may also possibly share your information with legal and regulatory authorities if required to by law.

CCTV: Some of our sites are monitored by CCTV cameras. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests. These are regularly monitored to prevent and detect crime, to maintain the security of our premises, for the reassurance of our staff and visitors, to investigate incidents relating to the health, safety and welfare of people we support, visitors, members of the public or our employees. We routinely keep CCTV footage for 30 days, however, on occasions it may be necessary to retain some footage for example when requested by the police or to assist our legitimate interests as an employer and service provider.

6. How we keep your information safe

We take the security of your personal information extremely seriously and anything we do with your data will be in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

Where we use systems to support us in managing your information (eg our client management system or Shared Lives matching site), we undertake thorough data protection and security diligence of software providers who support us in developing and managing these systems. If there is a requirement for these providers to access live information about you held in our systems, we make sure there is an appropriate information sharing agreement in place to support this and we restrict access as much as we can.

Here are some of the ways we protect your personal information:

- Secure folders on our computer systems
- Password protection
- Firewalls on our servers
- Locked cabinets and drawers
- Restricted access to systems
- Policies, procedures and training
- Making sure we don't keep hold of it for longer than we need to and destroying it properly when we no longer need to hold it

7. Your rights over your information

At PSS, we recognise that your personal information is yours, and under the law you have rights:

i. Your right to be informed

This privacy notice is the main way that we tell you how we collect data about you, what we use it for, why and how we hold it and how long we will hold it for. The information in this privacy notice is not exhaustive and we are always happy to provide any additional information or explanations where needed. If you can't find what you are looking for here, please contact our data protection lead using the contact details at the end of this notice.

ii. Your right to access your information

As well as knowing that we hold information about you, you also have a right to access that information. If you wish to see your records, you just need to contact the data protection lead using the contact details at the end of this notice or ask someone in your service. This is called a 'subject access request' (SAR). Once we receive it, we will look at the request carefully, and if we need to we may ask you for clarity on exactly what information you want



to see as this may make it easier and quicker for us to provide you with it. We will normally provide access to this information within one month; and there is no charge for us to provide it.

iii. Your right to amend your information

If you disagree with something in the records we hold about you – you have what is known as a ‘right to rectification’. In other words – you have the right to request that we amend the information we hold on you, where you think it is inaccurate. You can either make this request verbally to the team you work with or using the contact details at the end of this notice. We will contact you within one month to let you know if we have made the change. We are unable to amend some information we hold about you for statutory reasons, ie payroll information etc. If we are not able to amend your information we will let you know the reason for this and what your options are.

iv. Your right to erasure (to be forgotten)

This is also known as the ‘right to be forgotten’. This simply means that you don’t want us to hold information about you any longer, or don’t think we have the right to do so. This could be because you no longer give us consent to hold it, you don’t think we have a legitimate reason for holding it or that it is no longer necessary for us to hold it. The right to be forgotten is not absolute though and there are often good reasons why we may need to retain your information against your wishes. If you want us to erase your information, you can either make this request verbally to the team you work with or using the contact details at the end of this notice. We will contact you within one month to let you know if we have erased your information, and if we can we’ll let you know the reason for this and what your options are.

v. Your right to restriction

This simply means that you can limit the way that PSS uses your data and is an alternative to requesting the erasure of your data. So for example, if you access your records and disagree with some of the information, you can use your right to ask for the data to be amended. You can also ask us to restrict how we use that information until the amendment has taken place. It essentially allows you to ‘block’ us from using your data. We will simply have to hold the data with restricted access to it, until the other challenges are resolved.

vi. Your right to object

You have a right to object to the way we use your data if you disagree with it. For example, at PSS, we don’t use your information for marketing purposes in any way, but if we did you would have a clear right to object. Also, depending on your own personal circumstances, you have the right to object that we don’t have a legal or legitimate reason for doing so. We will immediately stop using your data, unless we are able to demonstrate that we do have a good reason for holding and using it.

vii. Your rights around profiling and automatic decision making

At PSS, all the work we do is focused on people and their individual circumstances. Unlike loan applications or insurance quotations – decisions at PSS are never made automatically by machines and formulas. Decisions about how your information is used and stored are always made by people who have responsibility for your information at PSS and have knowledge of how to manage your information appropriately. We would also never use your data for ‘profiling’ purposes in the way that online retailers do when they look at the things people buy.

viii. Your right to data portability

This right only applies when you provide us with information with your consent and where we automatically process the data (eg using electronic means). The right is simply that we have to be able to provide it in a ‘machine readable format’. There are very few situations where we see this being applicable at PSS, as this right is mostly connected to financial transactions.

To find out more about my rights

If you want to know more about your rights in relation to your information you can contact: The Information Commissioners Office (ICO). The ICO is the regulator in the UK, and they provide a lot of information on their website about your rights under the law.



Their contact details are:

Call: **0303 123 1113**

Online: **ico.org.uk**

8. Changes to this privacy notice

This privacy notice is reviewed regularly to make sure that it reflects how we use your information. Where appropriate, changes will be notified to you by email or post. We may update this on our website when there are minor changes but will let you know of any major changes.

9. Data controller

In most of our service areas PSS decide what information to collect, how to collect it and how to use it - so we are what is known as the data controller. The only service where things are a bit different is our Women's Turnaround service where the Ministry of Justice (MOJ) are a joint data controller. For this service we use the computer database that the Ministry of Justice provide us with and we collect the information that is required as part of the work we do around rehabilitation.

10. How to raise a concern or complaint

PSS are committed to protecting your personal information and to reassure you that you have control over the information we store about you, how we use it and what types of information you would like to receive from us.

We are always happy to respond to concerns and objections or provide any additional information or explanations where needed.

Write to:

**Head of quality, PSS,
Eleanor Rathbone House,
Connect Business Village,
24 Derby Road, Liverpool,
L5 9PR**

Call us on **0151 702 5524** if you have a concern about the way we are handling your information as we'd like to discuss this with you and see if we can put things right. However, if you want to, you are entitled to complain to the supervisory body which is the Information Commissioner's Office.

Call: **0303 123 1113**

Website: **ico.org.uk**

psspeople.com