



Nova Children's Project CIC

PRIVACY NOTICE
for service users and their families/carers

Nova Children's Project CIC takes its responsibility for the confidentiality of your personal information very seriously. This notice explains how we collect and use personal data about children/young people who use our services and their families/carers.

Data Controller

As an organisation that collects and uses personal information, we are called a Data Controller. If you have any queries about our role as Data Controller, please contact our Data Protection Officer.

What personal data do we collect about service users and their families/carers?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Nova Children's Project CIC is committed to providing high quality services and a key element of this is making sure we have accurate, up to date information about children/young people who we support.

If you are a service user, parent/carer or a named emergency contact we collect basic information that may be used to identify you. This includes your name, telephone number and postal and/or email address.

If you are a service user, we also collect what is sometimes called sensitive or special categories of data. This information includes:

- Details of any disability and/or diagnosis.
- Age and date of birth.
- Information about your health, mobility and medical needs, including any specific needs around food and drink.
- Your support needs, including personal care.
- Things you like or dislike, or things that might make you angry or upset. How we can support you to enjoy your time at our services.
- How we can best communicate with you.
- Incidents and accidents where you have been involved, so that we can see how we might improve the way we support you and monitor risk.
- Photographs to support with communication and identification.
- We might also ask you to give us information for equality monitoring purposes, such as ethnicity or faith.

We also keep registers of when people have attended our services.

Why do we collect and use this information?

We collect, keep and use pieces of information for different purposes. The legal basis for us keeping this information depends on the information and the reasons why we hold it.

We collect and use personal information in order to provide high quality, appropriate care for the individuals who use our services. We process this data because we believe we have a legitimate interest to do so.

Some information also helps us to keep service users safe, e.g. around medication or health needs. This information is kept because we believe it is in service users' vital interests that we do so.

We keep registers of attendance for children and young people. We share this information with the local authority and funders so that they can make sure the services are meeting people's needs.

There may be occasions when we will ask you and/or your parent/carers for consent to use your data, for example to help us inform the public about our work. If this is the case, we will explain to you and/or your carers exactly what your data will be used for. You can withdraw your consent at any time.

How is your personal data collected?

There are two main ways in which we collect data: directly or indirectly.

- Direct interactions: you or your parent/carer may give us personal data by using our website, filling in forms or by corresponding with us face-to-face, by post, phone, email or otherwise.
- Indirect interaction: we may collect information from third parties. This includes through other agencies that may be involved with your family, such as the Disabled Children's Social Work Team or a school. They will be required to provide appropriate evidence that you have agreed for your personal information to be shared with other organisations.

Who has access to your data?

The Project Manager, Deputy Project Manager and Company Directors have access to your data. Files are adapted so that staff and volunteers can only see data that is completely necessary to carry out their role.

Your legal rights – access to records

You have the right to access your personal data. More specifically you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provided to us.
- **Request deletion** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, for example where you consider that we do not need it any longer for the purposes for which we originally collected it, where you have withdrawn your consent to us using it and where you consider that we cannot show a 'legitimate interest' in continuing to process it.

You may request a copy of the information that Nova Children's Project CIC hold about you by writing to the Project Manager. Access will be arranged as soon as possible (it must take place within forty days of the request).

Data breaches

A data breach is considered by the Nova Children's Project CIC to be "a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed under GDPR." <https://ico.org.uk/for-organisations/guide-to-pecr/communications-networks-and-services/security-breaches/>

If a data breach occurs, then Nova Children's Project CIC will take the following actions:

- The ICO will be informed within 72 hours of the project becoming aware of the breach unless it is unlikely to result in a risk to the rights and freedoms of the subject. This will include the Project Manager completing a Breach Notification Form, which can be found on the ICO website <https://ico.org.uk/for-organisations/guide-to-pecr/communications-networks-and-services/security-breaches/>.
- The subject will be informed as soon as possible if the personal data breach is likely to result in a high risk to their rights and freedoms.
- If required by a contract, the commissioner will be informed as soon as possible.

- A record of the breach will be kept, including those incidences that do not necessarily need to be reported to the ICO. This record will include details of the facts, its effects and the remedial action taken.
- For all data breaches, the Project Manager will assess whether the data breach needs to be investigated further, as to identify whether the event was down to human or systemic error and what processes need to be improved to ensure that further breaches are prevented.

Information sharing

We recognise the importance of working with other organisations so that we can meet the needs of our service users. We may share information in the following (although not exhaustive) circumstances, where it is legally required, or necessary for another reason allowed under data protection law:

- As part of a contract agreement – where we are required to provide monitoring information in relation to delivery of a services.
- Safeguarding - if we believe that either the individual or someone else may be at risk of harm.
- If we are legally required to do so, for example following a court order.
- We may use the information we have about service users to provide reports for a review. This may be shared with service users, parents/carers, as well as other care providers, social workers and schools.

Nova Children's Project CIC will give families as much notice as possible if we are going to share information, unless we were concerned that this may put an individual at risk of immediate and significant harm.

Closing files

We will only keep information about you for the length of time it is necessary to do so to fulfil the purposes for which it was collected. Once files have reached their retention date, records will be deleted and destroyed, as appropriate. If Nova Children's Project CIC delivers a service on behalf of another organisation, then the responsibility for the files lies with that organisation when the contract comes to a close.

How we store records

Nova Children's Project CIC has a number of steps in place to keep your personal information as safe as possible, including:

- We train all our staff and volunteers in data protection and security to increase awareness of its importance.
- Electronic files are processed and stored on Nova Children's Project CIC's web-based, collaborative platform, which is password protected and compliant with the General Data Protection Regulations.
- Paper files are stored in lockable filing cabinets, in a secure building that requires a fob system to access. If the paper files have to travel outside of the building (e.g. to a club being held at an external venue), they are secured in a safe location.

Making a complaint

If you have any questions about this privacy notice or how we handle your personal information, please contact the Project Manager.

If you are not satisfied by the response you also have the right to make a complaint at any time to the Information Commissioner's Office (details of the process can be found online at <https://ico.org.uk/for-the-public/raising-concerns>).

Data Protection Officer

The Data Protection Officer (DPO) for Nova Children's Project CIC is the Project Manager: Natalie Lower, who can be contacted on natalie@novachildrensproject.co.uk or 07757 719 893.