



Privacy Notice for People Using THE ACTION GROUP's Advice Services

This notice sets out THE ACTION GROUP's policy on the protection of information relating to people who use their services. Protecting the confidentiality and accuracy of personal data is a critical responsibility that THE ACTION GROUP takes seriously at all times. THE ACTION GROUP will ensure that data is always used in accordance with UK data protection law.

This notice tells you what we do with your personal data. This data is either provided to us by you or by someone who has referred you to us, such as your social worker.

We will ask you for the information described in the Table of Service User information at the end of this document.

We need this information in order to:

- Provide you with support services that you ask for and
- Allow partners to provide support on specific issues
- Ensure that our services are inclusive and equally available to all groups in society
- Check with you whether you were happy with the support given to you
- Ensure the safety of you and our staff
- Report required information to funders

We will not use your information for any other purposes without asking you.

Unless required by law we will only share your data with:

- Partner organisations that can provide specialised support
- Partner organisations to produce reports for funders
- Funders, for monitoring our performance
- Other bodies, with your permission

Lawful processing of personal data

Personal data must only be processed when there is a lawful basis for doing so. Most commonly, THE ACTION GROUP will use your data in the legitimate interests, including:

- Delivering our services to support you and/or your family
- Reporting to funders on our activities

In each case we have assessed the importance of the legitimate interest and consider that this use of the data is very unlikely to harm you or your family.



If you believe that our use of your data is or will cause you harm you have the right to object as long as you tell us why.

Some of your information that we use is technically known as Special Category Data. This is particularly sensitive and includes health and disability data, ethnicity, sexual orientation and criminal convictions. We have identified conditions in the Data Protection Act 2018 which permit us to use this data for the purposes explained above. If you want to know more about this, please contact us at DPO@actiongroup.org.uk.

Retention of data

The Action Group will only keep your information as long as we need to for the purposes it was collected for. Details of this are in the table at the end of this notice.

In some circumstances, such as generating statistics for a report, THE ACTION GROUP may anonymise personal information so that it can no longer be associated with service users, in which case THE ACTION GROUP may use such information without giving you a further notice. Nobody could get any information about you from this.

After the retention period has expired, THE ACTION GROUP will securely destroy your information.

Data Security and Personal Data Breaches

THE ACTION GROUP has uses appropriate security measures to keep your data safe.

Access to personal information is limited to those who have a business need to know. They will only process personal information on the Company's instructions, are subject to a duty of confidentiality and are trained in how to keep your information safe.

THE ACTION GROUP has put in place procedures to deal with any data security breach and will notify you and any applicable regulator of a breach where legally required to do so.

In you think there has been a data protection breach regarding the personal information (that The Action Group processes) please contact the DPO immediately. You can also report any suspected breaches to the ICO.

Details of our measures concerning security and data breaches are available on request.

Data Sharing

The Action Group uses external providers for various services (e.g. Microsoft 365) in all cases we have checked them out and put a contract in place requiring them to handle your data correctly.



THE ACTION GROUP also shares data with as necessary for the purposes above. This includes other members of the Parents Carewell Partnership and our funders. We have put a contract in place requiring them to handle your data correctly.

Copies of these contracts are available on request.

Your Rights and Obligations

Service User rights

You have the right to:

- **Request access** to personal information.
- **Request rectification** of personal information
- **Request erasure** of personal information.
- **Object to processing** of personal information where The Action Group is relying on a legitimate interest (or those of a third party) to lawfully process it.
- **Request the restriction of processing** of personal information.
- **Request the transfer** of personal information to another party.

If you (or your representative) wish to make a request on any of the above grounds, they should contact us, DPO@actiongroup.org.uk

Please note that, depending on the nature of the request, The Action Group may be unable to comply. If that is the case, we will explain why.

Data subject access requests

You will not normally have to pay a fee to access your information (or to exercise any of the other rights). However, we may charge a reasonable fee if the request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you (or your representative) to help confirm your identity. This is another appropriate security measure to ensure that your information is not disclosed to any person who has no right to receive it.

Compliance with This Policy

The Action Group's responsibility for compliance

The Action Group has appointed a Data Protection Officer (DPO) who is responsible for ensuring The Action Group is compliant with this policy. If you (or your representative) have any questions about this policy or how The Action Group handles personal information, you should contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO).

The DPO can be contacted at DPO@actiongroup.org.uk.



Table of Service User information

Information collected during the referral process, where a full service is not provided, will be retained for 1 year. Subsequently, a referral that evolves into an Advice service being provided, means that all information collected will be retained for 8 years once the service has ended.

| Advice Service user information | | | | | | |
|---------------------------------|----------------|-----------------------|--|-----------------------------|--|--|
| Type of personal data | Sensitive data | Purpose of processing | Potential transfer to third parties | Lawful basis for processing | Grounds for processing sensitive personal data | Retention Period |
| Name | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |
| Address | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |
| Date of Birth | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |
| National Insurance Number | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |
| Other Contact Details | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |



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| Support Needs | Yes | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice | 1 year/8 years after service has ended |
| Gender | Yes | Provision of Service/Equal Opportunities | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice/Equal Opportunities | 1 year/8 years after service has ended |
| Ethnicity | Yes | Provision of Service/Equal Opportunities | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice/Equal Opportunities | 1 year/8 years after service has ended |
| Sexual Orientation | Yes | Provision of Service/Equal Opportunities | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice/Equal Opportunities | 1 year/8 years after service has ended |
| Next of Kin | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |
| Referral Details | No | Provision of service | HMRC /DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | n/a | 1 year/8 years after service has ended |
| Case notes/Contact Log | Yes | Provision of service | HMRC/DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice | 1 year/8 years after service has ended |
| Risk Assessments | Yes | Provision of service | HMRC/DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice | 1 year/8 years after service has ended |



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| Correspondence | Yes | Provision of service | HMRC/DWP/Statutory Services/Third sector services/ auditors/Funders | Legitimate interest | Provision of Support and Advice | 1 year/8 years after service has ended |
| Finance and benefit details | No | Provision of service | HMRC/DWP/Statutory Services/Third sector services/ auditors/Funders | Service provision | n/a | 1 year/8 years after service has ended |