

PEOPLE WE SUPPORT PRIVACY NOTICE

Purpose of this Privacy Notice	This Privacy Notice tells you what to expect us to do with your personal information when you are supported by us.
Our Contact Details	Positive Futures 2b Park Drive, Bangor, Count Down, BT20 4JZ 028 9147 5720 dataprotection@positive-futures.net
What information we collect and use and why	We collect or use the following personal information about you during your referral and placement with us. • Contact Details (e.g. name, address, telephone number, personal email address) • Date of Birth • National Insurance Number • Gender • Contact details for people associated with you and your support.¹ • Bank Account Information • Information relating to your benefit entitlements • Correspondence from your landlord • Correspondence with the Office of Care and Protection We also collect the following special category information about you: • Health Information • Your religious beliefs • Your ethnicity • Your sexual orientation Our lawful bases for collecting or using personal information during your referral and placement are: • Consent • Legal obligation

¹ Example: Person with parental responsibility/next of kin/carer/advocate(s)/Healthcare professionals

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	• Contract • Legitimate interest Positive Futures has a legitimate interest in processing personal information it collects in order to support you to achieve your goals and to do so safely and effectively.
Where we get your personal information from	We collect your personal information from the following places: • From the person supported directly • People associated with you² • Healthcare providers and professionals³ • Office of Care and Protection • Benefit Agencies
How long we keep information	We will hold records that contain your information for no longer than is necessary, as per the retention periods specified in our Records Retention and Disposal Schedule
Who we share information with	Your information is shared with the Service Manager and support staff. If required, your information may also be shared internally on a need to know basis with other support departments. Your information may be shared with external agencies for the purpose of fulfilling our legal, regulatory and contractual obligations. Positive Futures uses data processors who are responsible for processing your information on our behalf such as our archiving facility and our support planning software provider.
Automated Decision Making	Automated decision-making only applies to recruitment screening processes.

² Example: Person with parental responsibility/next of kin/carer/advocate(s)

³ Example: GP/Social Worker/Hospital/Trust Day Care providers

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Data protection rights

Under data protection law, you have rights including:

- **Right of access** – you have the right to ask us for copies of your personal data
- **Right to rectification** – you have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- **Right to erasure** – you have the right to ask us to erase your personal data in certain circumstances
- **Right to restrict processing** – you have the right to ask us to restrict the processing of your personal data in certain circumstances
- **Right to object to processing** – you have the right to object to the processing of your personal data in certain circumstances
- **Right to data portability** – you have the right to ask that we transfer the personal data you gave us to another organisation or to you in certain circumstances
- **Right to withdraw consent** – when we use consent as our lawful basis you have the right to withdraw your consent

• **Please note:** We rely on your consent to be able to share your information with the Regulation and Quality Improvement Authority (RQIA) for their audit purposes. Arrangements under Article 43 (1) under Article 40 or 41 of Health & Personal Social Services (Quality, Improvement and Regulation NI) Order 2003 state that your personal records can be shared in the following circumstances:

- the information is disclosed in a form which the identity of the individual cannot be ascertained

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	• the individual consents to the information being disclosed • the individual cannot be traced despite taking all reasonable steps. In order for us to comply with the law, there are certain circumstances where we will have to share your personal information with RQIA without your consent. Article 43 (2) of Health & Personal Social Services (Quality, Improvement and Regulation NI) Order 2003 RQIA states that your personal records can be shared: • It is not practicable to disclose the information to RQIA in a form which does not identify you; • RQIA considers it is necessary due to a serious risk to health and safety • RQIA considers that it is necessary to do so having regard to risk and urgency of the exercise of their regulatory functions. You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data protection request please contact us using the contact details at the top of this privacy notice.
Transfers of personal data to any third countries or international organisations	We store and process personal data within the European Economic Area (EEA). We use external service providers, including cloud-based systems such as Microsoft 365. In limited cases personal data may be accessed from outside the EEA (for example for support purposes). Where this occurs, appropriate safeguards are in place to protect your data in line with data protection law.
How to complain	If you have any concerns about the use of your personal information you can make a complaint

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to us using the contact details at the top of this privacy notice. We will investigate your complaint and respond within a reasonable timeframe in line with data protection law.

If you are not satisfied with our response or remain unhappy with how we have used your information you can also complain to the Information Commissioner's Office (ICO)

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

You have the right to complain to the ICO at any time, however they will usually expect you to have raised your concern with us first.