

DAPP Privacy Policy Navigation

Yorkshire Children's Centre is committed to ensuring that the privacy of our services users is protected. Should we ask you to provide certain information by which you can be identified when using the DAPP service, then you can be assured that it will only be used in accordance with this privacy policy. To make it easier to navigate this privacy policy, please click on the relevant links below:

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1. WHO WE ARE

"Yorkshire Children's Centre" (referred to in this policy as "YCC", "we", "us" or "our") is a trading name of:

National Children's Centre
Brian Jackson House
New North Parade
Huddersfield
HD1 5JP

Registered Charity Number: 288125
Company number: 1763241
ICO Registration Number: Z5459259

2. OUR DATA PROTECTION OFFICER

YCC have appointed a Data Protection Officer, who can be contacted in the following ways should you have any questions, complaints or feedback about your privacy:

Mail: **Data Protection Officer**
 FAO Rob Edden and Bruce & Butler Limited
 Yorkshire Children's Centre
 Brian Jackson House
 New North Parade
 Huddersfield
 HD1 5JP

Email: dpo@yccuk.org.uk

Telephone: 01484 519988

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU

Dependent on the nature of your relationship with YCC, your personal data will be processed in a variety of ways.

We will collect, use, store and transfer different kinds of personal information about yourself which we have grouped together in the table below.

Categories of personal information	Description
Identity details	First name, middle names, last name, nickname, date of birth, signature, image, gender, language(s) spoken.
Contact details	Telephone number(s), email address(es), postal address(es), work address(es).
Employment details	Employment status.
Equal opportunities details	Any disability or additional needs, sexual orientation, sex life (if discussed by service user).
Professional Referrer details	Referrers name, organisation, address, telephone, email, signature
Relationship details	Who the service users' partner is, status of their relationship, restrictions in place, current or ex-partner, details of children (e.g. name, DOB, gender, ethnicity, relationship to male client, who the child lives with)
Criminal Offence data	Information relating to criminal convictions and offences.
Case details	Purpose for referral (e.g. domestic abuse allegations), nature of previous incidents, court orders in effect, information on social care involvement, information on CAFCASS involvement, information on probation involvement, Police involvement, Additional services that may be required (e.g.

	substance abuse, alcohol abuse, mental health matters, counselling, or therapy).
Message details	Information disclosed through communications or notes.

4. HOW WE COLLECT YOUR PERSONAL INFORMATION

Based on your interactions with us, we will collect your personal information in the following ways:

- When we receive a professional referral or a self-referral for the DAPP service;
- When we are provided with your details by a service user attending the program;
- When you enter into a confidentiality agreement with us;
- Where we record 1-2-1 and group sessions of your attendance of the program;
- When you talk with us either over the phone, via post or through email or text;
- When you visit our website; and
- When you fill out our forms or provide us with feedback.

Please note, failure to provide required personal information may negatively affect our ability to carry out core tasks required as part of the program that may benefit you. Failure to provide required information may result in a service users removal or refusal from the DAPP.

Where applicable, YCC will collect information relating to yourself from the following sources:

- The Police;
- External agencies that assist in working with perpetrators families and attends case management meetings;
- In contact and discussion with other relevant agencies (for instance Social Services and the Family Courts); and
- Mental health and substance misuse agencies.

YCC will share personal data in the event of an emergency or if yourself or another individual is assessed to be at a high risk of harm. YCC will view a situation as 'high risk' if the individuals affected or third parties present evidence of being subject to the following:

- Physical or emotional harm;
- Concerns for loss or possible loss of life; and
- Serious concerns for the welfare of the affected individuals or other third parties.

5. HOW WE USE YOUR PERSONAL INFORMATION

We are only allowed to use your personal information if we have a legal basis to do so, and we are required to inform you of what that legal basis is. We have set out in the table below: the purposes for processing your information, the categories of personal information affected, and the legal basis on which we rely on when we process your personal information.

In some circumstances we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

Purposes for processing	Categories of personal information	Legal basis for processing	Legitimate Interests (if applicable)
To share your personal data with educational institutions or other agencies for the purposes of research.	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Consent 	N/A
To manage our relationship with service users and affected third parties including notifying you about changes to our terms or privacy notices.	<ul style="list-style-type: none"> • Identity • Contact • Professional Referrer • Relationship 	<ul style="list-style-type: none"> • Performance of a Contract • Legal Obligation • Legitimate Interest 	To keep our records up to date.
To process professional and self-referrals including conducting a suitability assessment.	<ul style="list-style-type: none"> • Identity • Contact • Employment • Equal Opportunities • Professional Referrer • Relationship • Criminal Offence • Case 	<ul style="list-style-type: none"> • Performance of a Contract 	N/A
To enter into a confidentiality agreement either for the DAPP or for the Integrated Support Services (ISS)	<ul style="list-style-type: none"> • Identity • Professional Referrer 	<ul style="list-style-type: none"> • Performance of a contract 	N/A
To hold case management meetings to discuss each service users' case and record documentation of each meeting.	<ul style="list-style-type: none"> • Identity • Contact • Case • Relationship • Message 	<ul style="list-style-type: none"> • Performance of a Contract 	N/A
To record service user progress	<ul style="list-style-type: none"> • Identity • Contact • Case • Message 	<ul style="list-style-type: none"> • Performance of a Contract 	N/A
To administer 1-2-1 sessions and group session recordings	<ul style="list-style-type: none"> • Identity • Case • Relationship • Message 	<ul style="list-style-type: none"> • Performance of a Contract 	N/A
To manage incoming general enquiries or complaints from service users and affected third parties.	<ul style="list-style-type: none"> • Identity • Contact • Relationship • Professional Referrer 	<ul style="list-style-type: none"> • Performance of a Contract • Legitimate Interests 	To ensure that enquiries and complaints are managed appropriately.

To manage service users and affected third parties’ data in a centrally managed system	<ul style="list-style-type: none"> • Identity • Contact • Case • Message 	<ul style="list-style-type: none"> • Performance of a Contract • Legitimate Interests 	To ensure that service users data and affected third parties’ data is held in a secure system.
To gather feedback from service users and affected third parties.	<ul style="list-style-type: none"> • Identity • Contact • Message 	<ul style="list-style-type: none"> • Legitimate Interests 	To find ways to improve the service.

6. SPECIAL CATEGORY DATA

Special category data is personal information that is more sensitive by its nature such as health information and information relating to sexual orientation. Throughout the process of the DAPP, there will be circumstances where special category data is required to be processed to ensure the processing is fair.

Our special category condition for processing equal opportunities details is Substantial Public Interest Conditions Article 9 (2)(g) of the UK General Data Protection Regulation (UK GDPR):

- Safeguarding of children and of individuals at risk (Paragraph 18, Part 2, Schedule 1 of the Data Protection Act 2018).

7. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

To administer our services and meet our legal obligations, we only share your personal information with third parties in the following circumstances:

- To manage and monitor your relationship with us through our CRM;
- To administer and manage your relationship with us, including managing referrals;
- To conduct case management meetings;
- To administer the YCC services;
- To share data with educational institutions and other agencies to conduct research studies where you provide your consent for us to do so;
- To record a service users progress; and
- To meet legal obligations, for example, for the purposes of criminal investigations.

Before we share your personal information with a third-party, we will ensure that there is an appropriate Data Processing or Data Sharing Agreement in place to protect the sharing of the information.

We'll never make your personal information available to anyone outside of YCC for them to use for their own marketing purposes without your prior consent.

8. TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE EEA

The European Economic Area (EEA) consists of the EU Member States, Iceland, Liechtenstein and Norway. If we transfer your personal information outside of the EEA, we must tell you and we will rely on one of the following:

- **Adequacy Decision:** The country we send your personal information to provides an adequate level of protection which has been approved by the European Commission.

- **Standard Contractual Clauses:** The recipient of your personal information has provided us with signed Standard Contractual Clauses which has been approved by the European Commission. This holds the recipient accountable to safeguard the personal information.
- **International Data Transfer Agreement / Addendum (IDTA):** The recipient of your personal information has provided us with a signed IDTA which has been approved by the Information Commissioners Office (ICO). This holds the recipient accountable to safeguard the personal information.

For the purposes of this privacy policy, your personal data is processed solely within the UK and the EEA.

9. HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We will keep your personal information for as long as necessary to allow us to carry out our business functions. This includes satisfying any legal, accounting, or reporting requirements. When we assess how long to retain your personal information, we will consider the following:

- Any statutory or legal obligations;
- The terms we have enclosed in agreements we have with yourself;
- The purposes for which we originally collected the personal information;
- The lawful grounds on which we based our processing;
- The types of personal information we have collected;
- The amount and categories of your personal information; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

YCC regularly review the retention of personal information held within our care to ensure that we are not keeping personal information for longer than is necessary.

10. HOW WE LOOK AFTER YOUR PERSONAL INFORMATION

We will protect your personal information that you have provided to us via appropriate security measures and controls. This includes implementing technical and organisational measures to prevent the loss, misuse or alteration of your personal information.

YCC limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction, and they are subject to a duty of confidentiality.

11. YOUR RIGHTS

Everyone in the scope of the UK GDPR has rights relating to the collection and use of their personal information. The rights that apply to your personal information that is held within YCC are listed below:

- **Right to be Informed:** We will always be transparent in the way we use your personal information. You will be informed about the processing through relevant privacy policies.
- **Right to Access:** You have a right to request access to the personal information that we hold about you.

- **Right to Rectification:** We want to make sure that the personal information we hold about you is accurate and up to date. If any of your details are incorrect, please let us know and we will amend them.
- **Right to Erasure:** You have the right to have your information 'erased' in the following situations:
 - Where the personal information is no longer necessary in relation to the purpose for which it was originally collected or processed;
 - When you withdraw consent;
 - When you object to the processing and there is no overriding legitimate interest for continuing the processing;
 - When the personal information was unlawfully processed; or
 - When the personal information must be erased to comply with a legal obligation.

Please note that each request will be reviewed on a case-by-case basis and where we have a lawful reason to retain the information or where exceptions exist within our retention policy, then it may not be erased.

- **Right to Restrict Processing:** You have the right to restrict processing in the following situations:
 - Where you contest the accuracy of your personal information, we will restrict the processing until you have verified the accuracy of your personal information;
 - When processing is unlawful, and you oppose erasure and request restriction instead; or
 - Where we no longer need the personal information, but you require the information to establish, exercise or defend a legal claim.
- **Right to Data Portability:** In certain situations, you have the right to obtain and reuse your personal information for your own purposes via a machine-readable format, such as a .CSV file.
- **Right to Object:** You have the right to object to the processing of your personal information in the following circumstances:
 - You no longer want to receive direct marketing; or
 - Where processing is based on our legitimate interests.

If you want to exercise any of your rights listed above, please contact us.

12. NOT HAPPY?

If you feel that YCC have not upheld your rights, we ask that you contact us by emailing the Data Protection Officer whose contact details can be located in **Section 2** of this privacy policy.

If you are not satisfied with our response, or believe that we are not processing your personal information in accordance with the law, you have the right to lodge a complaint with the Information Commissioners Office (ICO) by using the details below. We would be grateful for the opportunity to manage your concerns directly before you approach the ICO so please contact us in the first instance.

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

Telephone: 0303 123 1113

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