



GDPR PRIVACY NOTICES

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1. Introduction

This notice is intended to provide information about how Bright Futures Care will use (or “process”) personal data about individuals including: our staff; our current, past and prospective children / young

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people / vulnerable adults (referred to hereon as service users); their parents, carers or guardians (referred to in this policy as “parents”); and our contractors.

This Privacy Policy applies alongside any other information that our sites (Education and Care settings) may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Policy also applies, in addition to our sites’ (Education and Care settings) other relevant terms and conditions, and policies, including:

- Data Retention Policy / Records Management Policy
- Child Protection and Safeguarding Policies
- Health and Safety Policy
- E-Safety, ICT and Acceptable Use Policies
- Safeguarding Policies
- Data Protection, Information Sharing and Confidentiality Policies

For ease of reference and understanding, Bright Futures Care have produced different Privacy Notices for the different categories of individuals we deal with:

- Staff Privacy Notice
- Service User Privacy Notice
- Third Party Privacy Notice

Staff Privacy Notice - How we use your information

Who are we

Bright Futures Care Ltd are registered with the Information Commissionaires Office (ICO.) in England. For the purposes of UK Data Protection Law, Bright Futures Care are a data controller in respect of the personal information that we collect and process about you as described in this privacy notice.

Bright Futures provides inspirational care and education and care to children, young people and vulnerable adults, resulting in life changing experiences and countless stories of success.

Bright Futures believes that all service users should have the opportunity to live within a mainstream community setting and make a positive contribution to the world around them. Such opportunities should not be denied on the basis of presenting risk, disability, behaviour or indeed a lack of specialist community provision.

Bright Futures works with children, their families, placing authorities and regulators to overcome all barriers to achieving meaningful community inclusion. We achieve this by thinking creatively, setting high practice standards and by listening to the aspirations and hopes of each service user and their family.

Our focus on support, care and acceptance allows each service user to develop as an independent individual, equipped with the knowledge, experience and life skills to look to the future with increased confidence and aspiration.

Why do we collect and use staff information

We lawfully process your information in accordance with the General Data Protection Regulation (GDPR) Article 6 (a), (b), (c), (d) and (f). We may process your personal data with your consent, and/or for our legitimate business interests and/or where it is necessary to exercise or comply with our legal rights and obligations including those in relation to safeguarding and employment, and/or where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent, and/or where processing is necessary for the establishment, exercise of defence of legal claims, and/or where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity, and/or the performance of a contract, and/or where you have made the data public. "Legitimate Interests" means the interests of our company in conducting and managing our business and providing the best service in the most secure way.

These interests include:

- To contact you regarding your opinions on our services which may be used for marketing, research and analysis, where you have consented to be contacted for such purposes;
- For general administration purposes;
- To help us improve the quality of our services;
- To help us detect and prevent fraud and money laundering;
- To help us recover debts;
- To carry out analysis and staff profiling;
- Performance records;
- To support learning and Continuing Professional Development (CPD);
- Disciplinary proceedings;
- To comply with law in relation to Safeguarding;
- Safeguarding Service Users;
- Providing Education and Care.

In Law there are also requirements in relation to safeguarding and employment:

- DBS checks;
- Employment rights;
- PAYE;
- Pension provision.

When we process your personal data for our legitimate business interests, we always ensure that we consider and balance any potential impact on you and your rights under data protection laws.

If you have any concerns about the processing described above, you have the right to object to this processing. For more information on your rights please see 'Your Rights' section below.

Categories of personal information that we collect, hold and share include:

We will only ever collect the information we need - including data that will be useful to help improve our services.

We may collect and process the following data about you:

- Personal information to support employment and safeguarding requirements in law, such as name, postal address, phone number, e-mail address, N.I. number, driving licence details, photograph, PAYE details, passport, bank details, utility provider details, marriage certificate, birth certificate, employee number, vehicle details.
- Special Categories of personal information to support you in the workplace (such as trade union membership, health data).
- Criminal convictions as required in law to ensure safeguarding.

Collecting your information

We may collect and process the following data about you:

Personal information, such as name, postal address, phone number, e-mail address, N.I. number, driving licence details, photograph, PAYE details, passport, bank details, utility provider details, marriage certificate, birth certificate, employee number, vehicle details, that you provide by filling in forms:

- through recruitment process (HR);
- through finance / administration department;
- through personal development portfolios;
- CCTV (visual profile and vehicle registrations);
- obtained through training providers.

Special Categories of personal data processed (such as health, processed through GDPR Article 9 (2) (h) (Occupational Health and fitness for work)):

- obtained through sickness reporting;
- obtained through recruitment (HR);
- obtained through self-certification;
- through finance / administration department.

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide information to us or if you have a choice in this. Whenever the processing of your personal data requires your consent then you will be given the opportunity to opt-in and then to opt-out if you so desire.

Storing your information

Information is stored by us on computers located in the UK. We may transfer the information to other reputable third-party organisations as explained below - they may be situated inside or outside the European

Economic Area however we will only share if they provide appropriate assurances as to security and management of the data. We may also store information in paper files.

We have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored securely to protect against its loss, misuse and alteration. Documentation can be supplied on request from our Data Protection Officer by emailing dataprotection@brightfuturescare.co.uk.

We take steps to ensure that any organisations that we share your data with will have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored correctly.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information, we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred. To mitigate this risk, all emails from Bright Futures containing personal data are sent password protected, according to company guidelines.

We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need information, we will always dispose of it securely, using specialist companies if necessary to do this work for us. We ensure that your preferences with us are replicated with the third-party service providers. They will hold your information for our purposes only.

We will hold staff records securely

- **Job applicants** - When individuals apply to work for us, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Their details will remain with our contracted third party provider to enable us to search against future jobs where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Disclosure and Barring Service, we will not do so without informing you beforehand unless the disclosure is required by law.
- **Personal information about unsuccessful candidates** -
 - **External candidate** - will be destroyed or deleted, (see below table).
 - **Internal candidate** - reference will be retained on the staff file in accordance with current employee.
- **Successful candidates / employee** - once a person has taken up employment with us, we will compile a file relating to their employment.
- **Current employee** - Information is maintained on both computer and on paper. In both cases the information contained will be kept secure and will only be used for purposes directly relevant to that person's employment. There is controlled access relevant to the staff position held.
- **Former employee** - once their employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it. We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff personnel files is up to 7 years following departure from Bright Futures. However, incident

reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Files will be kept securely electronically and / or in hard copy.

Who do we share your information with

There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless we are legally required to do so or there is a recognised legitimate business interest.

We may also disclose your personal information to third parties, if we are under a duty to disclose or share your personal data for legal or regulatory purposes, in relation to existing or future legal proceedings, for the prevention of fraud/loss or to protect the rights, property and safety of our employees, our service users or others.

We have robust processes to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether we release data to third parties are subject to a strict approval process and based on our detailed assessment of:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested;
- the arrangements in place to store and handle the data;
- arrangements for return / destruction;
- ability to facilitate a subject access request.

Why we share your information

Just like most other organisations, we work with third-party service providers which provide important functions to us that allow us to be easier, faster, and friendlier in the way we deliver our services. We need to disclose user data to them from time to time, as part of our legal obligations and legitimate business interests, so that the services can be performed.

As previously highlighted, we do not share your information with anyone without your consent unless the law and our policies allow us to do so.

Below are the authorities under which we share your data and with whom we share:

Who we share with	Article 6 basis	Why we share	What is shared
HMRC Tax Office	Legal obligation	PAYE and TAX	Name, DOB, address. NI number ; pay, bank details
IRIS Professional	Legitimate business interest	PAYE management system	Name, DOB, address. NI number ; pay, bank details; hours worked
United CRB	Employment contract/legal obligation	DBS check completed by the subject in the first instance. Bright Futures Care receive an update	Name, DOB, convictions, address and previous address, result of DBS and certificate number

		from the service with minimal information on.	
DVLA licence checks	Legitimate business interest	To ensure legal obligations in relation to using company vehicles and authorised drivers. Driving licence checks.	Name, DOB, driving licence details, NI number, current address
Scottish Widows	Legal obligation	Pension provider	Name, salary, dob, address, E-mail, NI number
Training providers	Legitimate Business interest	Provision of training in relation to team teach, first aid, health and safety, etc.	Name, email , DOB, site, role, NI number
Simply Health	Legitimate business interest	Contact details	Name, contact
Federation of Private Business	Legitimate business interest	HR advisory	Staff details including, name, contact, roles, nature of disciplinary and employment matters
Zenzero	Legitimate business interest	Internal I.T. support and monitoring	Name, work email address, computer usage
OFSTED/CQC	Legal obligation/legitimate business interest	To demonstrate compliance with regulatory standards	Staffing/recruitment details and procedures

Your Rights

Under data protection legislation, you have the right to request access to information about you that we hold. You can do this free of charge; the information will be considered and then provided within a month of request. Unreasonable requests may be charged. You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include (but is not limited to) information which identifies other individuals, information concerning a reference supplied by Bright Futures or information which is subject to legal privilege (for example, legal advice given to or sought by us, or documents prepared in connection with a legal action).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection Regulations.

If you wish to exercise any of these rights please contact the Data Protection Officer by:

- writing to the Data Protection Officer at Bright Futures Care, Asher House, Barsbank Lane, Lymm, Cheshire, WA13 0ED;
- calling the Data Protection Officer on 01925 759162; or
- emailing the data protection officer on dataprotection@brightfuturescare.co.uk

Queries and Complaints

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should notify the Data Protection Officer on dataprotection@brightfuturescare.co.uk. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with Bright Futures directly before involving the regulator.

For more information about your rights under the Data Protection Act contact the Information Commissioner's Office at <https://ico.org.uk/>.

Service User Privacy Notice – How we use your information

Who are we

Bright Futures Care Ltd are registered with the Information Commissionaires Office (ICO.) in England. For the purposes of UK Data Protection Law, Bright Futures Care are a data controller in respect of the personal information that we collect and process about you as described in this privacy notice.

Bright Futures provides inspirational care and education and care to children, young people and vulnerable adults, resulting in life changing experiences and countless stories of success.

Bright Futures believes that all service users should have the opportunity to live within a mainstream community setting and make a positive contribution to the world around them. Such opportunities should not be denied on the basis of presenting risk, disability, behaviour or indeed a lack of specialist community provision.

Bright Futures works with children, their families, placing authorities and regulators to overcome all barriers to achieving meaningful community inclusion. We achieve this by thinking creatively, setting high practice standards and by listening to the aspirations and hopes of each service user and their family.

Our focus on support, care and acceptance allows each service user to develop as an independent individual, equipped with the knowledge, experience and life skills to look to the future with increased confidence and aspiration.

Why do we collect and use service users' information

We lawfully process your information in accordance with the General Data Protection Regulation (GDPR) Article 6 (a), (b), (c), (d) and (f). We may process your personal data with your consent, and/or for our legitimate business interests and/or where it is necessary to exercise or comply with our legal rights and obligations including those in relation to safeguarding and employment, and/or where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent, and/or where processing is necessary for the establishment, exercise of defence of legal claims, and/or where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity, and/or the performance of a contract, and/or where you have made the data public. "Legitimate Interests" means the interests of our company in conducting and managing our business and providing the best service in the most secure way.

These interests include:

- for the purpose of placement selection;
- provision of safe care;
- to support service users' learning, including but not limited to physical education, spiritual development, career services, trips, computer skills;
- to monitor and report on service users' progress;
- to provide appropriate help, support, provide information, advice and guidance;
- to provide effective communication with parents / carers;
- to provide effective communication with staff;
- for management and planning;
- to assess the quality of our services;
- to comply with the law regarding data sharing;
- to support you to decide what to do after you leave home or school.

Categories of a service user's information that we collect, hold and share include:

We may collect and process the following data about you:

- personal information (such as name, unique identification number and contact details);
- characteristics (such as ethnicity, language, nationality, country of birth);
- attendance information (such as sessions attended, number of absences and absence reasons);
- National curriculum assessment results;
- Special educational needs information;
- Relevant medical information;
- Internet usage.

Collecting a service user's information

We may collect and process the following data about you:

Personal information, such as name, postal address, phone number, e-mail address, unique identification number, photographs, passport, bank details, birth certificate and family information through:

- Placing Authority referral process;
- information provided by you;
- multi-agency meetings;
- from parents / carers;
- CCTV (visual profile);
- photographs as part of learning programme and safeguarding.

Special Categories of personal data processed (such as health, processed through GDPR Article 9 (2) (d) (Legitimate interest of business in relation to provision of a safe environment to live and learn)):

- medical information from health service;
- SEN details from Placing Authority;
- gender and religion through Placing Authority, or parents, or from subject.

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide information to us or if you have a choice in this. Whenever the processing of your personal data requires your consent then you will be given the opportunity to opt-in and then to opt-out if you so desire.

Storing a service user's information

Information is stored by us on computers located in the UK. We may transfer the information to other reputable third-party organisations as explained below - they may be situated inside or outside the European Economic Area however we will only share if they provide appropriate assurances as to security and management of the data. We may also store information in paper files.

We have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored securely to protect against its loss, misuse and alteration. Documentation can be supplied on request from our Data Protection Officer by emailing dataprotection@brightfuturescare.co.uk.

We take steps to ensure that any organisations that we share your data with will have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored correctly. We will not share your data if you have advised us that you do not want it shared, unless it is the only way we can make sure you stay safe and healthy, or we are legally required to do so.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information, we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred. To mitigate this risk, all emails from Bright Futures containing personal data are sent password protected, according to company guidelines.

We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need information, we will always dispose of it securely, using specialist companies if necessary to do this work for us. We ensure that your preferences with us are replicated with the third-party service providers. They will hold your information for our purposes only.

We will hold your records securely

We keep information about you on computer systems and also sometimes on paper:

Bright Futures Care - Privacy Notices

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- **Current service users** - Information is maintained on both computer and on paper. In both cases the information contained will be kept secure and will only be used for purposes directly relevant to your placement. There is controlled access relevant to the staff position held.
- **Former service users** - have their records archived in accordance with the requirements of our retention schedule and then deleted.
- **Where a service user moves placement** - Information is provided to the new placement and then the files are archived in accordance with the requirements of our retention schedule and then deleted.

We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Currently for looked after children this is until they are 75 years of age. Files will be kept securely electronically and / or in hard copy.

Care and education records are stored in compliance with the Independent Schools Standards and related standards governing the activity.

Who do we share a service user's information with

We routinely share a service user's information with:

- schools or colleges that the service users attend during or after leaving us;
- the local authority and their commissioned providers of local authority services;
- the Department for Education (DfE);
- The joint council for qualifications (JCQ)
- OFSTED/CQC;
- Regulatory Inspection visitors;
- Health and safety executive;
- staff in homes and schools;
- clinical staff;
- parents / carers;
- LADO;
- police;
- Quality Assurance Visits;
- multi-agency forums (LAC and PEP).

Why we share a service user's information

Just like most other organisations, we work with third-party service providers which provide important functions to us that allow us to be easier, faster, and friendlier in the way we deliver our services. We need to disclose user data to them from time to time, as part of our legal obligations and legitimate business interests, so that the services can be performed.

As previously highlighted, we do not share your information with anyone without your consent unless the law and our policies allow us to do so. We have robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data.

Decisions on whether we release data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested;

- the arrangements in place to store and handle the data;
- arrangements for return / destruction;
- ability to facilitate a subject access request.

Below are the authorities under which we share your data and with whom we share:

Who we share with	Article 6 basis	Why we share	What is shared
Schools or colleges that the young people attend after leaving us	Legal obligation	To further the education provision	Educational records
The local authority and their commissioned providers of local authority services	Legal obligation / contract	Provision of care and education for young people with SEN and Looked after Children	Educational record, Education Health Care Plan, Looked after children notes, multi-agency forum notes, personal education plans
The Department for Education (DfE)	Legal obligation	Educational attainment policy and monitoring; The National Young People Database (NPD). Provision of young people record number.	https://www.gov.uk/education/data-collection-and-censuses-for-schools ; name of young people
The joint council for qualifications (JCQ)	Legitimate business interest	Currently signed for on a JCQ consent form however the detail is provided to them by Us as a legitimate business interest. Attendance for the exam is consensual.	Name, dob, any health considerations to enable reasonable adjustments to take the exam
OFSTED / CQC	Legal obligation	Ensuring a monitored and accountable service provision is in place	All relevant personal or sensitive information (restricted by purpose of visit to minimise data) reported upon anonymously
Regulatory Inspection visitors	Legal obligation	Ensuring a monitored and accountable service provision is in place	All data of staff residents and young people as deemed appropriate by the inspector
Health and safety executive	Legal obligation	Safety in the workplace. Safety in the schools and homes. Consideration as to the level of safeguarding needed on each site which is commensurate with the behavioural / risk posed.	Environmental information and personal information. Behaviour, health.

Staff in homes and schools	Legitimate business interest	Maintaining a safe environment for the provision of necessary care and specialist education. Pastoral support and safeguarding.	Behaviour reports, personal contact details , multiagency reports
Clinical staff	Legitimate business interest	Provision of support for Special Educational needs	Personal data name. dob, family circs , behaviour, risk assessment, EHCP, and health data
Parents / carers	Legitimate business interest	<p>To enable the provision of educational support at home. In general, We will assume that a young person consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the young person's activities, progress and behaviour, and in the interests of the young person's welfare. That is unless, in The School or Home's opinion, there is a good reason to do otherwise.</p> <p>However, where a young person seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, The School or Home may be under an obligation to maintain confidentiality unless, in The School or Home's opinion, there is a good reason to do otherwise; for example where The School or Home believes disclosure will be in the best interests of the young person or other young people, or if required by law.</p>	Ongoing reports and communication in relation to behaviour and achievement.

LADO	Legal obligation	Keeping Children safe in education	All relevant personal or sensitive information (restricted by circumstance minimise data)
Police	Legal obligation	Keeping children safe in education	All relevant personal or sensitive information (restricted by circumstance to minimise data)
Independent Visitor audits	Legitimate business interest	Ensuring that the service provision is of the highest standard and compliant with regulation / law	All relevant personal or sensitive information (restricted by purpose of visit to minimise data) reported upon anonymously
External education support providers (software)	Legitimate Business interest	Software support for learning which the young person logs onto to. They normally log on with a consent to the web site however the requirement is made by our staff, hence the decision to use Legitimate Business Interest ... the provision of learning as article 6 basis.	Names, log on e-mail
External education providers	Legitimate business interest	Provision of external educational support to further develop the young person	Name , dob, address and potentially health data to support the learning plan
Zenzero	Legitimate business interest	Internal I.T. support and monitoring	Name, work email address, computer usage

Your Rights

Under data protection legislation, you or your parent/guardian have the right to request access to information about you that we hold. You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations), or information which is subject to legal privilege, (for example legal advice given to or sought by us, or documents prepared in connection with a legal action).

We are also not required to disclose any examination marks ahead of any ordinary publication, nor share any confidential reference given by the school or home itself for the purposes of the education, training or employment of any individual.

You may ask a parent or other representative to make a subject access request on your behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of a service user, the law still considers the information in question to be yours.

If you are aged 13 and above, you are generally assumed to have a level of maturity and can request this yourself, although this will depend on the circumstances and you may have to have the support of a parent or representative.

All information requests from, on behalf of, or concerning service users - whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection Regulations.

If you wish to exercise any of these rights please contact the Data Protection Officer by:

- writing to the Data Protection Officer at Bright Futures Care, Asher House, Barsbank Lane, Lymm, Cheshire, WA13 0ED;
- calling the Data Protection Officer on 01925 759162
- emailing the data protection officer on dataprotection@brightfuturescare.co.uk, or
- speak to any member of staff.

Queries and Complaints

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should notify the Data Protection Officer on dataprotection@brightfuturescare.co.uk. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with Bright Futures directly before involving the regulator.

For more information about your rights under the Data Protection Act contact the Information Commissioner's Office at <https://ico.org.uk/>.

Third Party Privacy Notice – How we use your information

Who are we

Bright Futures Care Ltd are registered with the Information Commissionaires Office (ICO.) in England. For the purposes of UK Data Protection Law, Bright Futures Care are a data controller in respect of the personal information that we collect and process about you as described in this privacy notice.

Bright Futures provides inspirational care and education to children, young people and vulnerable adults, resulting in life changing experiences and countless stories of success.

Bright Futures believes that all service users should have the opportunity to live within a mainstream community setting and make a positive contribution to the world around them. Such opportunities should not be denied on the basis of presenting risk, disability, behaviour or indeed a lack of specialist community provision.

Bright Futures works with children, their families, placing authorities and regulators to overcome all barriers to achieving meaningful community inclusion. We achieve this by thinking creatively, setting

high practice standards and by listening to the aspirations and hopes of each service user and their family.

Our focus on support, care and acceptance allows each service user to develop as an independent individual, equipped with the knowledge, experience and life skills to look to the future with increased confidence and aspiration.

Why do we collect and use your information

We lawfully process your information in accordance with the General Data Protection Regulation (GDPR) Article 6 (a), (b), (c), (d) and (f). We may process your personal data with your consent, and/or for our legitimate business interests and/or where it is necessary to exercise or comply with our legal rights and obligations including those in relation to safeguarding and employment, and/or where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent, and/or where processing is necessary for the establishment, exercise of defence of legal claims, and/or where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity, and/or the performance of a contract, and/or where you have made the data public. "Legitimate Interests" means the interests of our company in conducting and managing our business and providing the best service in the most secure way.

These interests include:

- To ensure that content from our website is presented in the most effective manner for you and for your computer;
- To provide you with information about our services or offers that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To contact you regarding your opinions on our services which may be used for marketing, research and analysis, where you have consented to be contacted for such purposes;
- To help us identify you when you contact or visit us;
- For general administration purposes;
- To help us improve the quality of our services;
- To help us detect and prevent fraud and money laundering;
- To carry out analysis and customer profiling;
- When you communicate with us, (e.g. by emails, faxes, phone calls, tweets, etc.), we may retain such information and our responses to you.

When we process your personal data for our legitimate business interests, we always ensure that we consider and balance any potential impact on you and your rights under data protection laws.

If you have any concerns about the processing described above, you have the right to object to this processing. For more information on your rights please see 'Your Rights' section below.

Categories of Personal Information that we collect, hold and share

For the above purposes we will only ever collect the information we need – including data that will be useful to help improve our services. We may collect and process the following data about you:

- Name
- Address
- Email
- Telephone number

Collecting your information

We may collect and process the following data about you:

- Personal information (such as name, postal address, phone number, email address) that you provide by filling in forms;
- from our website (www.brightfuturescare.co.uk);
- in our schools and homes and when you contact us via telephone, in person or by letter.

This will also include information volunteered by you when you:

- order a brochure;
- enquire about a specific service, school or home;
- request information via telephone;
- request a call back;
- enter a competition or promotion;
- submit a question to us or provide us with feedback.

We also process data from details of your visits to our site including but not limited to:

- IP addresses (the location of the computer on the internet);
- pages accessed;
- files downloaded;
- cookies.

This is statistical data about our users' browsing actions and patterns, and does not identify any individual. It simply allows us to monitor and improve our service.

This helps us to determine:

- how many people use our sites;
- how many people visit on a regular basis, and how popular our pages are.

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and allows us to improve our site. For detailed information on the cookies we use and the purpose for which we use them please see cookie policy. If you want to disable cookies please refer to your browser help.

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide information to us or if you have a choice in this. Whenever the processing of your personal data requires your consent then you will be given the opportunity to opt-in or opt-out of having your contact details used as set out above, at the time your details are submitted.

For example, when you request information, you can tell us when you provide your details if you do not want to receive any other information from us, or you can let us know how best to get in touch with you with information that may be of interest.

At any time if you no longer wish to receive marketing emails or other promotional materials from us, you may opt-out of receiving these communications at any time by one of the following methods:

- by replying to the email address listed on the web page;
- by writing to the data protection officer at Bright Futures Care, Asher House, Barsbank Lane, Lymm, Cheshire, WA13 0ED;
- by calling the data protection officer on 01925 759162;
- By emailing the data protection officer on dataprotection@brightfuturescare.co.uk.

Storing your information

Information is stored by us on computers located in the UK. We may transfer the information to other reputable third-party organisations as explained below - they may be situated inside or outside the European Economic Area, however we will only share if they provide appropriate assurances as to security and management of the data. We may also store information in paper files.

We have security protocols and policies in place to manage and record your data privacy and preferences correctly, and to confirm that your data is stored securely to protect against its loss, misuse and alteration. Documentation can be supplied on request from our Data Protection Officer by emailing dataprotection@brightfuturescare.co.uk.

We take steps to ensure that any organisations that we share your data with will have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored correctly.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information, we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred. To mitigate this risk, all emails from Bright Futures containing personal data are sent password protected, according to company guidelines.

We will keep your information only for as long as we need it, to provide you with the services or information you have required, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need information, we will always dispose of it securely, using specialist companies if necessary to do this work for us.

We will hold your records securely

- Name and telephone contact details will be reviewed within two years. Where appropriate, you will be contacted for you to consider extending this for a further two years.
- Any notes relevant to identified service users will be transferred to their file and retained in accordance with legislation.

Third-party service providers will also store information, however there are strict conditions as to security, retention and sharing which enable us to control your information held by them. This is to ensure that your preferences with us are replicated with the third-party service providers. They will hold your information for our purposes only.

Who do we share your information with

There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared, unless we are legally required to do so.

Bright Futures Care - Privacy Notices

Date of issue: June 2020 (V.2.)

Review date: June 2021

We may also disclose your personal information to third parties, if we are under a duty to disclose or share your personal data for legal or regulatory purposes, in relation to existing or future legal proceedings, for the prevention of fraud/loss or to protect the rights, property and safety of our employees, our service users or others.

We have robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether we release data to third parties are subject to a strict approval process and based on our detailed assessment of:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested;
- the arrangements in place to store and handle the data;
- arrangements for return / destruction;
- ability to facilitate a subject access request.

Below is a table of the third-party service providers and business partners to whom we may disclose your data.

Why we share your information

Just like most other organisations, we work with third-party service providers which provide important functions to us that allow us to be easier, faster, and friendlier in the way we deliver our services. We need to disclose user data to them from time to time, for any of the purposes set out above, so that the services can be performed.

As previously highlighted, we do not share your information with anyone without your consent or unless the law and our policies allow us to do so.

Below are the authorities under which we share your data and with whom we share:

Who we share with	Why we share	What is shared
Department of education	Information in relation to referrals or enquiries may be shared	Contact details of parents / young people and carers as well as attainment information for young people
Local authorities	Information in relation to referrals or enquiries may be shared	Contact details of parents / young people and carers as well as previous family circumstances

Your Rights

Under data protection legislation, you have the right to request access to information about you that we hold. You can do this free of charge; the information will be considered and then provided within a month of request. Unreasonable requests may be charged. You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include (but is not limited to) information which identifies other individuals, information concerning a reference supplied by Bright Futures or information which is subject to legal privilege (for example, legal advice given to or sought by us, or documents prepared in connection with a legal action).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection Regulations.

If you wish to exercise any of these rights please contact the Data Protection Officer by:

- writing to the Data Protection Officer at Bright Futures Care, Asher House, Barsbank Lane, Lymm, Cheshire, WA13 0ED;
- calling the Data Protection Officer on 01925 759162; or
- emailing the data protection officer on dataprotection@brightfuturescare.co.uk.

Queries and Complaints

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should notify the Data Protection Officer on dataprotection@brightfuturescare.co.uk. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with Bright Futures directly before involving the regulator.

For more information about your rights under the Data Protection Act contact the Information Commissioner's Office at <https://ico.org.uk/>.