

APPENDIX 4 - FAMILIES USING OUR SERVICES

How do we collect information from you?

Information you give us directly

We collect information about you and family members when you register with us for any of our services and when you start to receive our services. We collect information when you voluntarily complete service user surveys, provide feedback and participate in events.

Information from our staff

Our staff will create records about you while delivering services, for example by way of notes added to your case file.

Information we receive from other sources

Your information may be received by us from third parties, which might include:

- agencies who are referring you to us
- professionals and other support agencies, such as health visitors, social care professionals, other voluntary organisations or charities
- members of your family who are using Home-Start services

What type of information is collected and used about you?

The information we collect and use will include personal data and sensitive data (known as 'special category data' in data protection law).

These records may include the following information relevant to you, your partner and the children you care for and anyone else who is part of your household:

- your name and contact details (including postal address, email address and telephone number)
- your date of birth
- contact details and background information of other members of your family
- your Next of Kin, GP and Health Visitor contact details
- contact we have had with you, including home visits
- income and financial details
- employment information
- children's information may include schools or nursery attended
- information from people who are involved with your family, such as schools, health professionals, social services and relatives and whether any children are subject to child protection/child in need plans or have other assessment needs
- information about lawyers or other representatives we may encounter in the delivery of services
- information about your use of our website and about the device used to access it, for instance your IP address and geographical location
- any other personal information shared with us

Data protection laws recognise certain categories of sensitive personal information as 'special category' and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We may collect and use the following types of special category information:

- disabilities, special educational needs or health condition
- details and records of medical treatment and medications
- your race, religion or beliefs or political views
- information about an individual's sex life or revealing an individual's sexual orientation

- criminal convictions that have been committed against an individual or which an individual has committed

How and why is your information used?

We will only collect and use the minimum necessary information needed for us to provide you with our services and for staff to deliver and provide appropriate support to meet your needs.

We use this information only to the extent necessary to provide the services to you that you have requested from us unless there are exceptional circumstances, such as when the health or safety of a child or others is at risk, or other situations where the law requires the disclosure of information.

If you do not provide us with information that we ask for and that we require, we may not be able to provide services to you. If you are uncomfortable about disclosing certain information to us or if you have any concerns or queries about why we require certain information, we are happy to discuss this in further detail with you.

In limited circumstances, we may ask for your consent to use your information (for example, for your experience with us to be used in Home-Start materials or on our website). In these circumstances, we will always ask for your explicit consent beforehand, and we will tell you how you can withdraw your consent if you change your mind (which you can do at any time).

Receiving communications from us by Email/Text/Phone/Post

We will only send you marketing communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails. We may send you marketing communications by post unless you have told us that you would prefer not to hear from us.

If you do not want to be contacted for marketing purposes we will not do that. Your details will be kept on a list so that we can contact you for other reasons. For example, to change an appointment or let you know about a change at our office.

Where is your information kept and how long is it kept for?

Information is retained in secure electronic and paper records and access is restricted to only those who need to know. Our guiding principle is that we are holding your information in strict confidence and in accordance with the law.

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for depends on our requirements to provide our services and run our business or to comply with the law. Case records are generally kept on our live system for up to 1 year, after which time they are deleted. In certain circumstances we may be required to keep records for a longer period, depending on the nature of the case and whether or not we are subject to separate legal obligations which require us to do this.

Who has access to your information?

To provide you with our services, we will share your information internally within Home-Start on a need-to-know basis, to ensure we are providing you with a good service. We may also share your personal information with some or all the following parties, but we will always do this in compliance with data protection law:

- other charities and public sector organisations that may have referred you to us, may be providing services to you or that we may be working in partnership with
 - health and education professionals (such as health visitors or head teachers)
 - other family members (where you are comfortable with this)
 - local council social work departments
 - the Police, Courts or Office of the Scottish Charity Regulator (OSCR)
 - safeguarders and other parties in connection with child or adult protection
 - lawyers or other representatives that may be acting on your behalf
 - statutory bodies in connection with legal and formal processes.
 - third parties working on our behalf (for example, to support our IT systems, or to send you mailings).
- However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own purposes.

We do not sell or rent any of your information to third parties.

We do not share any of your information with third parties for marketing purposes unless you have requested us to do so.

We will only share special category information with other organisations where that is necessary for legal reasons, or where there are other substantial public interest grounds.

Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

Legitimate interests

Where it is reasonably necessary to achieve our or others' legitimate interests (if what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Home-Start as a charitable organisation in pursuit of our aims and ideals. For example to:

- provide our services to support you and your family
- send postal communications which we think will be of interest to you
- conduct research to better understand our customers and supporters and to improve the relevance of our fundraising
- understand how people choose/use our services and products
- determine the effectiveness of our services, promotional campaigns and advertising
- monitor who we deal with to protect the charity against fraud, money laundering and other risks
- enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers
- better understand how people interact with our website

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

Specific Consent

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

Legal obligation

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like OSCR, or we are required to report a crime.

Vital interests

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual) or a safeguarding issue which requires us to share your information with the emergency services.

Our lawful grounds for processing Special Category data

When we use special category (sensitive) personal information, we require an additional legal basis to do so under data protection law. Our basis for using such information is normally to provide our services of counselling, social care, and safeguarding children and individuals at risk of neglect or physical, mental or emotional harm and for protecting their economic wellbeing. Sometimes we may use another route available to us at law (for example, if we need to process it for social protection purposes, vital interests, or, in some cases, if it is in the public interest for us to do so).