



## Privacy Policy

Crossroads North Argyll undertakes to respect and protect the personal information (data) you or your family have provided us with, or that we get from other organisations, and to keep it safe. We are committed to collecting the minimum amount of information needed and holding this information only when it is required. For the purposes of the General Data Protection Regulations (GDPR) we are the controllers and processors of the data.

This policy will outline what type of data we collect, why we collect it, how we will use, share and store it, what your rights are and how you can contact us to manage, edit or delete this information. You can contact us regarding your personal data or information, or to request a printed (or large print) copy of this privacy policy using the contact details below:

☎ 01631 562277

📍 Crossroads North Argyll, 2 Gibraltar Street, Oban, PA34 4AY

✉ [info@crossroadsnorthargyll.org.uk](mailto:info@crossroadsnorthargyll.org.uk)

### Who we are

Crossroads North Argyll is a local independent charity (Charity No. SC032051) and a Company Limited by Guarantee (Company No. SC231988). We provide a local respite service to unpaid carers across Oban, Lorn and the Isles.

### When do we collect information?

We collect information about you when you register with Crossroads North Argyll. We also record details of any further contact we have with you, e.g., visits and calls made by us or you as part of our ongoing support for you.

If you are a paid employee or volunteer with us then we will obtain and retain information about you from your recruitment application. If you are in paid employment with us or receive a travel or subsistence allowance as a volunteer, we will collect your financial information (bank account details).

### What type of information do we collect and why?

If you are a carer, Crossroads North Argyll will require to collect different types of personal data directly from or about you and the cared-for person. This will include your name, address, telephone number, email, date of birth, data relating to your personal and caring situations and medical data. We will store information relating to you and the cared-for person's health. This information will only be held with your explicit consent and we have a signed consent form for you to sign to allow us to share this information with relevant people. We will take extra care to ensure your privacy rights are protected.

We collect information about you and your caring role and the cared-for person to:-

- provide information, advice and support to you in relation to your caring role;
- seek your views or comments on the services we provide;
- notify/

- notify you of changes to our services;
- inform our future service development;
- provide anonymised monitoring information to our service commissioners and funders, to demonstrate the take up and effectiveness of services;
- provide the appropriate support to the cared-for person.

We will only contact you for marketing purposes if you have given us consent to do so, and will communicate with you by post, phone, SMS or email depending on the preferences you have indicated to us.

If you are an employee or volunteer, we will collect name, address, date of birth, employment history, references, criminal records check, professional certificates, details of emergency contacts, medical conditions). For paid employees we will collect and retain records relating to your ongoing employment with us.

### **Our Website**

We do not use cookies or collect usage data from our website ([www.crossroadsnorthargyll.org.uk](http://www.crossroadsnorthargyll.org.uk)). All email correspondence is retained for a period of one year, but we will not use your details for unsolicited contact.

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the page).

If an external website requests personal information from you, the information you provide will not be covered by Crossroads North Argyll Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

### **How do we protect your information?**

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means).

Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

All electronic forms that request data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g., information provided by email or our website) are at the user's own risk.

### **When will we share information about you?**

We will never sell your personal data and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed. This could include sharing data with third party organisations who provide a service to us and are acting as data processors, for example, to administer payroll services, and partners who support us in the delivery of services to you. We will undertake due diligence on these organisations and will require them to comply strictly with our instructions and data protection policies and legislation.

We/

and legislation. We regularly monitor all our data processors.

Under our agreement with Argyll and Bute Health and Social Care Partnership we may be required to share your personal information (name, address, age, ethnic background, details of the caring role and medical history) for you to access support identified through a Carer Support Plan. Carer Support Plans are prepared by Carers Centres.

In terms of the Carers (Scotland) Act 2016 we are required to supply anonymised data to the Scottish Government relating to the support we are providing. You as an individual cannot be identified from this data.

We may also share your data in the following circumstances:-

- Where we must comply with laws such as those for national security, taxation, or criminal investigations.
- Where we must undertake due diligence, to be sure we are not being used as a channel for criminal activities.

### **Disclosure**

Crossroads North Argyll has a legal duty to disclose some information, such as:-

- Safeguarding concerns will be reported to Adult Social Care;
- Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police;
- In addition, colleagues believing an illegal act has taken place will be required to report this to the appropriate authorities.

We will always inform you of any disclosure.

### **Legal grounds and Legitimate Interest**

When you contact us for respite care, you are engaging with us in an agreement for the provision of those agreed services (known as a 'contract' for lawful processing).

When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal bases available to us under the General Data Protection Regulations.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect and that does not intrude on your privacy or previously expressed marketing preferences.

Where we process sensitive personal data, we will make sure that we only do so in accordance with one of the additional lawful grounds for processing such as where we have your explicit consent, or you have made that information manifestly public. When we do this, we will tell you what sensitive personal data we are collecting and why.

### **Marketing**

It is always your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. You can change any of your contact preferences at any time.

### **How/**

### **How long will we hold your information?**

We will only hold this data for as long as it is necessary for the purposes for which it is provided to us. We will dispose of unnecessary personal data using secure deletion methods (electronic) or shredding. We will contact you periodically (at least every 4 years) to confirm that the data we hold about you is accurate and up-to-date and that we may continue to contact you. We will then update our records accordingly.

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as reporting to funders and identifying trends to help inform our actions and improve our services.

### **How can you manage or delete the information we have about you?**

Your rights regarding the data we hold and collect about you are outlined in the data protection policies and legislation of the United Kingdom and, from 25 May 2018, the European Union. These include: the right to access, edit and update, request the deletion of, and restrict the processing of your personal information, the right to object to the collection of your personal data and the right to lodge a complaint with a supervisory authority about your personal information.

If you would like to find out what personal information/data we hold about you, delete any of this data, (e.g., remove your name from any of our mailing lists), update your communication preferences or if you have any questions or comments about this Privacy Policy, please contact us.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO). You can contact the ICO on

☎ +44 0303 123 1113

📍 Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

✉ [registration@ico.org.uk](mailto:registration@ico.org.uk)

This Privacy Policy will be reviewed annually and Crossroads North Argyll reserves the right to modify this statement at any time.