CHANGES COMMUNITY HEALTH PROJECT PRIVACY NOTICE

In the course of providing services to you, CHANGES COMMUNITY HEALTH PROJECT collect and hold certain personal information about you. We will only do so with your explicit consent and in accordance with all applicable data protection legislation, including the General Data Protection Regulation.

Information collected

The personal information collected by us will be limited to that which is essential to allow us to provide the support you require and deserve. CHANGES operate a self-referral process. We will not take information from or share information with any other agencies without your **explicit consent.**

- 1. At initial contact we will collect name, gender, addresses, telephone numbers, e-mail addresses, year of birth and how you found out about us.
- 2. We will ask for consent to hold a personal record on CHANGES database and to update this record with future contacts and requests. The right to withdraw consent at any time is made clear at this stage.
- 3. A follow up phone call is offered to discuss what CHANGES services you may be interested in. We will inform you that the conversation is confidential, unless there are concerns about the safety or wellbeing of an adult or child at risk, in which case information may need to be shared with the appropriate authority.
- 4. Requests for course/group/activity registrations, counselling forms and CBT consultations are noted on the new enquiry form and the database record.
- 5. When you start a specific piece of work with CHANGES (counselling, CBT, join a group/activity or starts a course) the staff member will explain what information is collected, how it will be stored and who it may be shared with (if appropriate). Information collected at this stage may include employment, immigration statuses, disabilities (such as physical or learning disabilities), physical health, mental health, other support services/agencies involved such as GP, CPN, debt counselling, legal support, employment, housing.
- 6. If information is to be shared, for example through referral to NHS, your signed permission must be obtained. Wherever possible, CHANGES will respect your wishes when sharing information about you and only share information that is accurate and up to date, necessary for the purpose for which it is being shared and shared only with those who need to see it.

How we will use your personal information and who it will be shared with

Internal

- 1. Any staff member may discuss their work with an individual with their line manager/coordinator as part of confidential meetings/supervision to ensure the best support is provided to the person.
- 2. Volunteers may discuss their contact with individuals (in courses/groups/activities or peer matchings) with their Volunteer Coordinator for the purposes of supervision and to ensure the best support is provided to the person.
- 3. Counsellors/CBT therapists will discuss their therapeutic work with individuals with their clinical supervisor. They will discuss any adult or child protection issues with their line manager/coordinator.
- 4. Volunteers meeting together for peer support will not share information that will identify or breach the confidentiality of anyone using CHANGES services.
- 5. Each course/group/activity will develop a confidentiality agreement which covers the duration of their working together.
- 6. Information provided to our Board of Trustees for the purpose of monitoring and evaluation (including case studies) will be anonymised.

External

We will, on an anonymised basis, use your personal information to demonstrate the impact of our services. Any case study information shared will always be on anonymised basis unless we have further explicit consent from you.

We may share your personal information with an external auditor for quality auditing purposes but only in the presence of the Coordinator and only after the auditors have provided us with all necessary written undertakings to preserve the security and confidentiality of your information.

We will share personal information with law enforcement or other authorities if required by applicable law (including, in line with our Safeguarding and Promoting the Welfare of Children/Safeguarding Adults at risks policies, where there are concerns about the safety or wellbeing of a child or adult at risk and it is considered necessary for their welfare and protection).

We will not share your personal information with any other third party without first obtaining your explicit consent.

How long your personal information will be kept

We will keep your personal information after we have finished providing our support to respond to any questions, complaints or claims made by you or on your behalf, to show that we treated you fairly and/or to keep records required by law. We will not keep the information for longer than necessary. We keep different types of information for different lengths of time – for example files from therapy are kept for 7 years, other records are kept for 5 years.

Keeping your personal information secure

We have appropriate security measures in place to prevent your information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Your Rights

You have a number of important rights which you may exercise in relation to your personal information free of charge. In summary, those include rights to:

- access your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to the processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of these rights, including the circumstances in which they apply, visit the Information Commissioner's Office ("**ICO**") website at https://ico.org.uk/for-the-public/.

If you would like to exercise any of the rights, please email, call or write to us using the details in 'How to contact us' below, let us have enough information to identify you, let us have proof of your identity and address, and let us know the information to which your request relates.

How to complain

Please report any complaint to the details set out in 'How to contact us' below. We hope we can resolve any query or concern you raise about our use of your information. You also have the right to lodge a complaint with the ICO who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.

How to contact us

Please contact us if you have any questions about this Privacy Notice or the information we hold about you as detailed below:

CHANGES Community Health Project, 108 Market Street, Musselburgh, EH21 6QA

Telephone: 0131 653 3977 or email info@changeschp.org.uk

You will be asked at your initial contact to confirm that you have read and understood the contents of this privacy notice and consent to us processing your personal information in accordance with this notice. You will be told that you can withdraw your consent at any time by using the contact details above.

If you are receiving 1:1 support, including counselling, CBT, peer support you will be asked to sign a Privacy Notice and consent Statement to confirm you have read and understood the contents and consent to us processing your personal information in accordance with this Privacy Notice.

signature:	
Date:	