

Approved by FCC Management Committee May 18



Freshwaters Contact Centre

Privacy Policy

Our Privacy Policy explains:

- What information we collect and how we collect it
- Why and how we use your information.
- How long we keep your information
- How we may share your information
- Your rights on the information we hold about you
- Security - how we keep your information safe
- Changes to this Privacy Policy
- How to contact us

The Data Controller is Freshwaters Contact Centre

Information We Collect

In order to provide our services and for the other purposes set out in Use of Information below, we collect and process Personal Data from the users of our Contact Centre. We may collect the following information:

- Personal information (for example, your name, email address, mailing address, phone numbers, date of birth)
- Sensitive Personal Data where this may be relevant to the success, safety and/or security of users of our services
- Attendance information (such as attended sessions, number of absences and absence reasons)
- Safeguarding incidents

From time to time and as permitted by applicable law(s), we may collect Personal Data about you and update any existing Personal Data that we currently hold from other third-party sources

We collect your information from:

- Self-Referral Forms
- Safe Referral process from the NACCC website
- Referrals from organisations e.g. Cafcass, Family Solicitors
- Pre-visit checklists

We may also collect information from telephone conversations, emails and written and verbal communications and from records of the Contact Centre sessions.

Use of Information

Your Personal Data may be used in the following ways:

- To provide our services to you,
- To respond to your requests and enquiries,
- To improve our services, for example reviews and evaluation questionnaires,
- To request your participation in surveys, or other initiatives which help us to gather information used to develop and enhance our services,
- To comply with applicable law(s) (for example, to comply with a search warrant or court order) or to carry out professional ethics/conduct investigations,
- To enable us to provide and to maintain our own accounts and records and to support and manage our employees.

Consent and Lawful Processing of data.

Our legitimate interests include processing such Personal Data for the purposes of

- providing and enhancing the provision of our services.
- administration and programme delivery
- dealing with medical needs - any information you provide we must have had explicit consent to use.
- all other [cases that](#) are necessary for our legitimate interests, which are to run the Contact Centre

How long will we keep your information?

File Type	Retention Period
HR files Employment references Redundancy details	6 years after employment/volunteering ceases
Parental Leave	5 years from birth/adoption or 18 if child receives a disability allowance
Disclosure and Barring Service Certificate (formerly Criminal Records Bureau disclosures certificates) obtained as part of the vetting process.	The actual disclosure form will be destroyed after 6 months. However, we will keep a record of the date of the check, the reference number, the decision about vetting and the outcome.
Finance records Income tax, NI returns, income tax records and correspondence with HMRC, Parental Leave, Wages and Salary records	We will retain records for 6 years from the end of the last company financial year they relate to, or longer if: they show a transaction that covers more than one of our accounting periods.
Supported contact only – Referrals & Self referrals including court orders, CAFCASS reports, pre- visit forms, attendance records	Securely disposed of after three years from the end of the last contact session attended unless there is a safeguarding or child protection issue
Information relating to paid/unpaid staff not covered above that are not used for three years will be treated as confidential waste and disposed of as such.	Securely disposed of after three years.

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Accident books and paperwork relating to safeguarding or child protection issues about a specific child	Will be kept indefinitely as children can request this information up to the age of 25 years through Local Authorities.
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Sharing and Disclosure to Third Parties

We may disclose your Personal Data to third parties from time-to-time under the following circumstances:

- You request or authorise the disclosure of your personal details to a third party.
- The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant or court order).
- The information is provided to service providers who perform functions on our behalf.
- To Hosting providers for the secure storage and transmission of your data
- To Legal and compliance consultants, such as external counsel, external auditors
- To Technology providers who assist in the development and management of our web properties
- Where a safeguarding issue has been identified then information may be shared with relevant authorities and with NACCC.

Subject Access/User Rights

As a user, you are subject to the following rights:

- The right to be informed of the use of your Personal Data
- The right to access and/or to require the correction or request the erasure of your Personal Data
- The right to block and/or object to the processing of your Personal Data
- The right to not be subject to any decision based solely on automated processing of your Personal Data
- In limited circumstances, you may have the right to receive Personal Data in a format which may be transmitted to another entity.

If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with the Information Commissioner's Office.

You may seek to exercise any of these rights by sending a written request to:

Freshwaters Contact Centre.

P.O. Box 12308,

Harlow,

Essex.

CM20 9NT

Or email freshwaters.cc@virgin.net

Information security

We are working to protect your personal information that we hold, its confidentiality, integrity and

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availability.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Contact Centre staff and volunteers subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- We have Security Information Policy in place which defines the measures we take to protect your personal information. We use a combination of technology and procedures to ensure that our paper and computer systems are protected, monitored and are recoverable.
- We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent.

How to Contact Us

Freshwaters Contact Centre.
P.O.Box 12308,
Harlow,
Essex.
CM20 9NT.
Email address: freshwaters.cc@virgin.net
Telephone: 01279 450220