

General Privacy Notice

Introduction

In this Privacy Notice, "we", "us" and "our" refer to The Burton Addiction Centre, trading as the BAC O'Connor Centre, together with the registered charity The O'Connor Gateway Trust.

This privacy notice tells you what to expect when we collect personal information. It applies to information we collect about:

- **Visitors to our website**
- **Job applicants, current and former employees**
- **People who use our services**

We are committed to safeguarding the privacy of our website visitors.

Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679). This Privacy Notice sets out how we will treat your personal information.

This Privacy Notice applies where we are acting as a data controller with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.

How we collect personal information about you

The way we manage the information we might collect about you depends on the capacity in which you contact us, whether you are a stakeholder, partner or professional, a member of the public, someone who may benefit from our services, a donor or a job applicant.

You may contact us and leave personal information with us directly or indirectly.

Directly:

- Making a referral to one of our services or programmes
- Being referred to one of our services or programmes
- Making a donation
- Signing up to an event
- Asking for information, such as further details about volunteering with us
- To apply for a job vacancy
- Visiting our website which uses cookies (read more about our cookies policy below)
- Completing any of our surveys or questionnaires we may use for research purposes

You may complete a form on our website, or you may give us your details via a phone call, email or on a paper form.

We also collect information from the individuals and families that we provide support for. This is discussed in detail with individuals and / or families during their first points of contact with us and is covered in depth in the Service Users Policy below.

Or Indirectly:

- Giving your details and permission to share your details through a third party such as Just Giving
- Giving your details to an event registration website such as Eventbrite
- When you respond to a survey using Survey Monkey

When you sign up for this type of online service, you should ensure you are happy with the organisation's Privacy Policies. If you state that you are fundraising for BAC O'Connor or O'Connor Gateway Charitable Trust and you opt in to being contacted by us, then your details will most likely be passed to us to allow us to administer your activity. If you contact us on social media e.g. Facebook or Twitter, you agree to their terms and conditions and understand the information posted in the public domain is not confidential.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-...> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-...> (Internet Explorer);
- (e) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

Third party websites

Our website includes hyperlinks to, and details of, third party websites.

We have no control over, and are not responsible for, the privacy policies and practices of third parties.

What information do we collect about you?

We will only ever collect the information that we need.

We may process data about your use of our website ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website.

We may process information contained in any enquiry you submit to us regarding services ("enquiry data"). The enquiry data may be processed for the purposes of understanding the most common enquiries and how we can best present useful information on our website.

We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content. The correspondence data may be processed for the purposes of communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and communications with users

We may collect personal information such as name, contact details, date of birth (where appropriate), work history, references and the usual information contained on an employment application. We will also ask for, where appropriate, proof of your eligibility to work in accordance with our legal obligations.

Where we are legally required to do so we may ask for your details of any criminal offences and seek an up to date disclosure and barring service check. In certain situations we may also ask you to supply limited sensitive or special category personal data relating to criminal records or your health ("sensitive personal data"). We will only ask for sensitive personal data when it is needed to comply with a statutory obligation or to ensure that any employment rights are respected.

What we do with your information

We will use the information you provide to:

- Understand your needs and provide you with a better service
- Communicate with job applicants
- Fulfil your requests – such as information in respect of donations, participation in events and campaigns, and provision of information
- Comply with charity law and other regulations
- Record any contact we have with you
- Communicate with our supporters
- To improve our services and to target our resources effectively

Information Sharing

We promise never to sell or share your data with any third party for marketing purposes.

We may also need to disclose your details if required to by the police, regulatory bodies, legal advisors, our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining

professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Retaining and Deleting Personal Data

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Our Records Management Policy details retention periods for different types of information.

Personal information about unsuccessful candidates for employment will be held for the period of the filling of the vacancy plus six months in line with our Records Management Policy, it will then be destroyed or deleted.

Once a person has taken up employment with us we will compile a file relating to their employment. We have to hold this information in order to employ people. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with us has ended.

Personal data will be retained for a minimum period of 6 years.

Notwithstanding the other provisions of this notice, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

How we store and process your data

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

We will store all your personal data on secure servers, our data will be collected, stored and processed in the UK and EEA only.

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet therefore any transmission is at your own risk.

When we do not require your information any more, it will be disposed of securely.

Changes to our Privacy Notice

We keep this document under regular review and in line with any legislative changes and will place any updates on this webpage. You should check this page occasionally to ensure you are happy with any changes to this policy.

SERVICE USERS PRIVACY NOTICE

This policy relates to service users of BAC O'Connor and The O'Connor Gateway Trust who may receive various services that we provide. Processing of your data is required in order to offer you these services. We will keep processing of PII (Personally Identifiable Information) down to the bare minimum in order to lawfully provide your services.

What this Policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. Where the lawful basis for holding and processing data is consent, you are free at any time to opt-in and opt-out of that consent. We will always respect your decision to remove consent unless the law requires differently.

The information we collect and use includes:

- information you provide during the referral and assessment process so that we can deliver safe services on a needs-led basis
- information you allow other service providers and commissioners to provide during the referral and assessment process so that we can deliver safe services on a needs-led basis
- information given by yourself and information collected from other service providers and commissioners with your consent and stored as part of our ongoing service provision

The only exception to this is when you request a call-back – we exercise our right under legitimate interest in order to call you back.

Scope of Consent

By submitting your personal data to us, you are affirming your consent for such information to be used in accordance with this Privacy Notice. You will be able to withdraw that consent at any time by the methods described provided said information is not required to deliver contracted services or to abide by statutory laws as laid down in England & Wales.

Opting out

Once you have given your consent, you can however still control whether or not you continue to receive communications or receive marketing from us. The simplest way to remove consent is to contact us directly, however you can also remove or change consent with regards to your chosen channel of communication e.g. phone, email etc.

You can also opt out at any time from communications via any of the methods described above.

How we store and process your data

Your data will be collected, stored and processed in the UK and EEA only. Your data in relation to the following services will be stored for eight years from the date you no longer require any of our services:

- Detoxification
- Rehabilitation
- Recovery Housing
- Resettlement
- Work Placements

If you are not admitted to our service we will only retain your assessment data for a period of two years.

This is to ensure that we meet contractual requirements regarding the use of Health and Care related data and ensure we can continue to provide relevant and safe services to you should you wish to access any of our services following your discharge. We use recognised third parties to dispose of confidential waste and information relating to banking.

Our Obligations

We are a data controller and processor in relation to the information that you provide us with. As a result, we are legally responsible for how that information is handled.

We will always endeavour to comply with the Data Protection Act 1998, the GDPR [2018], ePrivacy and PECR in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- fairly and lawfully,

- as set out in the legislation and this policy,
- to the extent necessary for these purposes

We will process your personal data ourselves as the data processor. We will take all reasonable precautions to safeguard the personal information that you supply.

If you have any requests concerning your personal information or any queries about our privacy policy, website or service, please contact us using the details given below.

Data Analysis

Sometimes your data will be used for analysis purposes. In these instances, the information is aggregated and wherever possible anonymised in line with the Information Commissioner's code of practice.

Third Parties

All third party users of your data are required to adopt and implement best practice security measures to prevent the loss of, or unauthorised access to your personal information. Where valid, appropriate, verified, and subject to legal obligations, third parties are also expected to complete rectification or erasure requests within 72 hours of receipt.

We will ensure that whenever we share your information with other services in line with your Care Plan and to ensure you receive the right service, at the right time, that we will take all necessary measures to make sure the information is correct. Where we receive information about you from third parties, such as referrer and commissioners, which is then identified to contain errors, we will notify the third party immediately to request the errors are rectified.

Security

We will report any breaches or potential breaches to the appropriate authorities within 24 hours, and to anyone affected by a breach within 72 hours. If you have any queries or concerns about the data usage please contact us.

Subject Access Requests

You have the right to make a Subject Access Requests to request details of the information we hold about you and we will reply to these within one month. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

Who we are and how to contact us

The Burton Addiction Centre, trading as the BAC O'Connor Centre, together with the registered charity The O'Connor Gateway Trust are registered in England and can be contacted as follows:

By email: reception@bacandoconnor.co.uk

Call: 01283 537280

Through our website: www.bacandoconnor.co.uk

By post: Data Protection Officer, BAC O'Connor, 126, Station Street, Burton upon Trent, Staffordshire, DE14 1BX

How to change your preferences

You can contact us to change your preferences at any time. This includes requests to object to processing, to be forgotten [right to be deleted], for your data to be corrected, or to transfer your data to another platform. We take your rights seriously and will always reply promptly and professionally.

You also have the right to raise any concerns about our processing of your personal data with the Office of the Information Commissioner (ICO), details of which are available at: <https://ico.org.uk>