

ISLAND WELLBEING PROJECT

Island of Hoy Development Trust Privacy Notice

Our contact details

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This privacy notice is for anybody that receives or has received support from our Community Wellbeing Coordinator, as part of the Island Wellbeing Project.

It explains what personal data (information) we Island of Hoy Development Trust hold about you, how we collect it, and how we use and may share information about you, whilst we are working with you and for a period thereafter. It also explains your rights under the law.

Who collects and uses the information?

Island of Hoy Development Trust (the 'Organisation') is a 'data controller' and gathers and uses certain information about you. Island of Hoy Development Trust is a Company Limited by Guarantee registered in Scotland under company number SC306586 and is a Registered Scottish Charity No. SC038909. We are regulated by: Companies House and The Office of the Scottish Charity Regulator.

What information do we hold about you and why?

On the next page we've provided a table which shows what kinds of information we collect about you and why.

What is our lawful basis for data processing?

The General Data Protection Regulation (GDPR) requires us to identify a lawful basis for processing your data.

Our lawful basis is Article 6(f): legitimate interests. Without your data we cannot provide an effective one-to-one support service. Processing your data allows Community Wellbeing Coordinators to keep track of who they're providing support to and the actions agreed during their support. It also allows us to monitor the impact of our service and identify any trends which can inform the future development of our service.

Our lawful basis for sharing your information in a referral to another organisation, or for sharing photographs and stories we collect about you is Article 6(a): consent. This means we will always ask you before we share this information, informing you about how your data will be shared and who with, before asking you to complete a written consent form.

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Type of personal data collected	Justification
Name	For coordinators: to identify the record in the planning and provision of one-to-one support.
Gender	For monitoring: to identify patterns in who support is provided to, to ensure that the service is accessible to everybody
Contact number or email address	For coordinators: to enable follow-up communications and, where consent is provided, to allow additional referrals
Age (by bracket)	For monitoring: to identify patterns in who support is provided to, to ensure that the service is accessible to everybody and that project is successfully engaging with a wider age demographic
Referral route	For monitoring: to identify which organisations are aware of the project and the support being provided, and to identify recurring 'informal' referral routes which may require attention
Presenting issue	<p>For coordinators: to support the planning and provision of one-to-one support</p> <p>For monitoring: to identify patterns in the key issues emerging for individuals supported, to inform future developments in the project's focus</p>
Supported provided	<p>For coordinators: to support the planning and provision of one-to-one support</p> <p>For monitoring: to identify patterns in the common forms of support provided, to inform future developments in the project's focus and highlight learning and development needs</p>
Future actions agreed	For coordinators: to support the planning and provision of one-to-one support
Referrals made	<p>For coordinators: to support the planning and provision of one-to-one support</p> <p>For monitoring: to identify patterns in which organisations receive referrals, to ensure there are effective relationships with the project</p>
Additional disclosed information	For coordinators: to support the planning and provision of one-to-one support
Photos and stories	For monitoring: to demonstrate impact

How will we collect this information from you?

Most of the personal information we process is provided directly by you, when you receive support from a Community Wellbeing Coordinator. We might also receive information indirectly, for example if you are referred to us by another service or organisation.

Do I have a choice about what personal data you hold about me?

Yes, you are not obliged to use our service or to give your personal data.

For us to deliver our one-to-one support there is certain information we need to collect to keep you and our staff safe, and to comply with our safeguarding duties. We will be able to advise on which information we need on a case-by-case basis.

If you ask the Community Wellbeing Coordinator, they will be able to show you the notes they make about you and the monitoring information they share.

How will we store your personal information?

Your information is securely stored on a password-protected Google Drive, hosted by Google LLC.

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way.

Who will have access to your personal information?

We limit access to your personal information to those who have a genuine need to know it. This is likely to mean the Community Wellbeing Coordinator and their Line Manager, but could in exceptional circumstances include other staff members, such as our safeguarding lead. If a member of staff leaves, then the new postholder will have access to this data. Those processing your information will do so only in an authorised manner and are subject to a strict duty of confidentiality.

We store your name and contact details separately to notes that the Community Wellbeing Coordinator makes. This helps us keep your data safe and allows the Community Wellbeing Coordinator to discuss the support they provide to you with their line manager, without needing to identify you.

How long will we store your personal information for?

We will store personal information up to one year after your last one-to-one support session, or at the end of the project, whichever comes sooner. At this point all the personal data we hold will be destroyed. The project currently ends on March 2022, but this date may be extended if the project receives additional funding.

Who will we share your data with?

We will share anonymised top-line information with Voluntary Action Orkney for the purposes of monitoring and evaluation. This means they will not be able to identify who you are and will not be told about the specifics of the support provided to you. They may share this anonymised dataset with other parties, such as funders and government agencies.

We may share information about you in order to make a referral to another organisation or service. You will always be consulted before we do this, and asked to give your consent.

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We may share photographs and stories about you in order to evidence our impact and raise awareness of our service. You will always be consulted before we do this, and asked to give your consent.

Your data protection rights

Under data protection law, you have rights including:

- 1) **Your right to information**- You have the right to be informed about the personal data we collect and use about you. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more.
- 2) **Your right of access** - You have the right to ask us for copies of your personal information.
- 3) **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- 4) **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- 5) **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- 6) **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- 7) **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please use the contact details at the top of the document to get in touch for more information about. and to exercise, any of the above right.

How to make a complaint

If you have any concerns about our use of your personal information, you can make a complaint. Please contact us using the details at the top of this document.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>