

Privacy Policy

This is the Privacy Policy for Foothold Cymru.



Privacy Notice for Participants accessing our services

Foothold Cymru are committed to treating the information you share with us, and any information we get about you from other sources with respect and keeping it safe. This notice tells you what Foothold Cymru does with the information we keep about access any of our services or projects.

Where we get information about you

We get information about you in the following ways:

When you give us information directly or make contact with us. We ensure that it is kept safe at all times.

When we are given information about you indirectly, e.g. referrals to Foothold Cymru's services or working closely with other agencies who are also working with you. Your information will only be shared with us by these organisations if you gave permission to them to share that information.

When we are given information about you by a family member / friend to help us support you.

What personal data we have and how we use it:

We will have some or all of the following information, dependent on the service(s) you access.

- Your name
- Your contact details, including address, email address and phone number
- Your date of birth
- National Insurance number
- Details for an emergency contact or next of kin
- Equalities monitoring information
- Criminal record history
- Risk assessment completed by Foothold Cymru and other agencies
- Details of any children
- Information about your family
- Details of people who may be a risk to you
- Education, training and employment information – what you have done and what you would like to do
- Proof of identification
- Information around any support you need and the support we provide for you
- Financial details
- Information related to your health
- Photographic images

We will use the information we collect to:

- Support you safely and in the best way we can
- Monitor and report on your achievements
- Report to funders
- Plan and manage the organisation
- Research to improve the way we support people
- Safeguard you and others
- Provide case studies to be used externally (we will anonymise these or ask specific permission) via our media consent process.

How we share your information within Foothold Cymru:

We will share your information within Foothold to:

- Make sure that anyone who may support you has access to your information
- For line managers, senior management and our audit team to check on the quality of the support you are receiving
- To help keep you and others safe

How we share your information outside Foothold Cymru:

We will share your information with agencies outside Foothold to:

- Safeguard you and others
- Make sure we are working together with other agencies who may be supporting you
- Comply with funders' requirements, including monitoring
- Promote Foothold Cymru and the work with do with other people such as media, public, potential funders (we will anonymise this or ask specific permission) via our media consent form.
- Enable regulatory bodies and funders to audit our services to make sure our support meets appropriate standards.

How we keep your data safe and who has access:

We keep your data in digital and/or paper version.

- Paper records: These are kept in secure locations within our offices or projects.
- Digital records: We will always ensure that we have technical controls in place. This includes making sure our network is protected and routinely monitored. We will store all of your personal information on our, secure password-protected data storage services provided in the Cloud, which meet appropriate security measures.

We may have to disclose your data, if required, to the police, regulatory bodies or legal advisors.

Keeping your information up to date:

Your information will be updated throughout your time with Foothold Cymru.

Your rights under GDPR:

Right of access: You have a right to ask for access to the information we hold on you. We will aim to give you this access as soon as possible but it will take no longer than a month. We reserve the right to remove any Third-Party information.

Right of erasure: We will hold your data for 6 years after you exit our services. In some cases we are required by legislation or contract requirements to keep your data for longer. E.g. safeguarding information or for European Funded projects.

The General Data Protection Regulation (GDPR) requires Foothold Cymru to state the lawful basis for processing your personal data.

Lawful basis for processing



Foothold Cymru processes your data under lawful processing conditions:

- 'Processing is necessary...in the public interest...and the data controller believes there is a need for the service'
- 'Processing is necessary...because of substantial public interest...and there are appropriate safeguards.'
- 'Processing is necessary for...the provision of health or social care systems and services...'

Complaints from people who access our services:

If you have any concerns about how we are handling your data please contact us on **01554 779910** or email us at **info@footholdcymru.org.uk** and we will investigate your concerns in line with our complaints policy.

If you are not satisfied with the response to your complaint, you can contact the Information Commissioner's Office:
www.ico.org.uk