**Elfrida Rathbone Camden Privacy Notice**

1. **Who we are**

#### We are Elfrida Rathbone Camden and you can contact us at 7 Dowdney Close,off Bartholomew Road, London NW5 2BP, telephone 020 7424 1601 or email info@elfridacamden.org.uk We provide support and education services for families and young people in the London Borough of Camden. Our services include Camden Futures, Leighton College and Inclusion Works.

#### What is a Privacy Notice?

#### A Privacy Notice is a document which explains why and how we collect your personal data and what we do to ensure that your personal data is collected and stored safely.

1. **What information we collect about you**

We will only collect the information from you that we need to be able to provide you with a service. This may include personal data, such as your age, date of birth, address, e-mail address, telephone number, your support needs or any health conditions you have.

1. **How we collect your information**

We collect most of our information directly from you, including when you use one of our services, complete one of our forms, when you write, telephone, email or meet with us.

We may also collect information from other organisations where it is relevant to the service we are providing for you. We would only do this with your consent.

1. **How we use your information**

There are several different ways in which we might use the information we have collected from you:

* To understand your care and support needs and to deliver the right kind of service to you
* To keep you and others safe and make sure no one is at risk of harm
* To keep in touch with you about the service you are getting from us
* To provide updates about our services and for marketing reasons

We may also use some of the data you provide about yourself to help us to understand who is using our services and how well we support them. This data will be used separately from your name, address or any other data that could identify you. This information is not used to inform any decisions we make about you individually, but helps us ensure fairness and equality in the services we provide. You do not have to agree to provide this information but it helps us if you choose to do so.

1. **The legal basis for using your information**

The law requires us to tell you the basis on which we process your data:

***To provide a service to you***

We process your information so that we can provide the service we have been asked to provide.

***Necessary in the performance of a contract***

Some of our processing is carried out to fulfil a contract or an agreement we have with you. Where we require information because it is necessary in the performance of a contract you will not be able to opt out of providing this information. This is because without it we would be unable to do the thing you have asked us to do.

***To fulfil our legal and regulatory obligations (substantial public interest)***

Some of our processing is carried out to ensure we fulfil our legal and regulatory obligations in providing support services

***Consent***

Sometimes we will ask for your consent to process your information. Where this is the case it will be detailed on the individual privacy notices attached to the service.

***Where it is necessary for our legitimate interests***

In all other cases, we rely on a condition called “legitimate interests”. The law allows us to process your data if it is in our legitimate interests to do so. But we can only do this if:

* it does not disproportionately affect your privacy rights;
* it doesn’t cause you any harm; and
* it isn’t overly intrusive.

The law also says we must let you know what we consider our legitimate interests to be. Our legitimate interests are:

* ensuring that our services meet the needs of our customers;
* ensuring that we make the most efficient use of our resources and we understand how we are performing;
* ensuring we provide a safe service; and
* ensuring we understand our customers’ experiences and views

If you think that anything we do with your data affects you adversely, you can ask us to stop processing it.

1. **Sharing your information**

If we are working with other organisations or services to support you, we may have to share information with them but will seek your consent to do this. We only do this if we have a good reason to and it is necessary for delivering the agreed support. You can object to us sharing your information but this might mean that you don’t get all the services you need.

*Where we are providing support services in partnership with another organisation or as part of a local authority contract, we may share your information with the commissioning local authority or NHS health trust. You can object to us sharing your information but this might mean that you don’t get all the services you need.*

Sometimes we might have to share information with authorities if we think that you or someone else is at serious risk of abuse or harm. We don’t need your consent to do this.

We also share some information with our data processors, which are organisations that carry out a service on our behalf, for example IT providers. We only share information which is necessary for them to carry out the service they have been contracted to provide. All our contractors operate under the terms and conditions of a legally enforceable contract and will not use your information for anything other than carrying out a service on our behalf.

1. **Keeping your information private**

We will keep your data securely in our offices and on our IT system. Your data may be shared with other staff of Elfrida Rathbone Camden, if this improves the service you will receive from us.

How long we keep your personal data for can depend on the type of data it is. We will never keep your information for any longer than is necessary for the purposes we need to use it for. Once you no longer receive a service from us, we keep your data we have a policy which people can request

**Your privacy rights**

You have several rights which allow you to choose and control how we use your data. These rights are explained below. If you would like to use these rights, please put your request in writing and send them to the ERC Data Protection Officer:

**Chris McAuley**

**Director**

**Elfrida Rathbone Camden**

**7 Dowdney Close**

**NW5 2BP**

**chris@elfridacamden.org.uk**

**Transparency**

You have the right to be informed about how we are using your data. If you think we are doing something with your information that we have not told you about in this Privacy Notice, you can object to this.

**Access**

You have the right to ask us what personal information we hold about you, and to request a copy, free of charge. *Please note if we consider that the request is manifestly unfounded, excessive, or repetitive, we can charge a reasonable fee. This fee will be based on the administrative cost of providing the information.*

**Objection**

You can object to the processing of your personal data. You should note that this right does not apply in all circumstances, for example, where we are processing information because it is necessary in the performance of contract we will not be able to stop processing this information.

**Withdrawal of consent**

**I**f we are processing your data based on your consent, you can withdraw this consent at any time. Where this is the case we may no longer be able to provide the relevant service to you.

**Rectification**

If you think that the personal data we hold about you is inaccurate or incomplete, you have a right to request that it be put right.

**Erasure**

You can ask us to delete your personal data where it is no longer necessary for us to use it, where you have withdrawn consent (if we process based on consent), or where we have no lawful basis for keeping it.

**Restriction**

You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

**Data portability**

You can ask us to provide you, or a third party (if possible), with some of the personal data we hold about you in a structured, commonly used, electronic form, so that it can be easily transferred.

**Data retention**

How long we keep your personal data for can depend on the type of data it is. We will never keep your information for any longer than is necessary for the purposes we need to use it for. Once we no longer need to keep your data it is removed from our records and destroyed. We keep different types of data for different lengths of time depending on legal requirements and our own Data Retention Policy.  If you would like to see a copy of our Data Protection Policy, please contact the DPO.

**Appeal**

If you are not satisfied with the way that we have dealt with your personal data, please let us know and we will try and resolve your concerns. Please contact the DPO whose details are above if you want to make a complaint.

If you are still not happy with our response, you have the right to appeal directly to the regulator – the**Information Commissioners’ Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**. Visit: [https://ico.org.uk](https://ico.org.uk/) or telephone: 0303 123 1113