



## DATA PROTECTION AND CONFIDENTIALITY POLICY

### 1. Data Protection

- 1.1 Reach4Reality aims to store and process personal data in accordance with the General Data Protection Regulation (GDPR) with effect from 25<sup>th</sup> May 2018 and in line with the six data protection principles encapsulated in the Regulation (see below for full details of these).
- 1.2 For the purposes of the Regulation, the Board of Trustees of Reach4Reality is the Data Controller (ie have ultimate responsibility for data protection), but the day-to-day responsibility for this is carried out by the Project Coordinator on behalf of the Board.

### 2. Summary of data held and processed

- 2.1 In order to carry out its' work, Reach4Reality will need to hold and process personal information about young people (including family members), volunteers, staff, supporters and other professionals.
- 2.2 In storing and processing this information, in whatever form, we aim to do this in line with the 6 data protection principles of:
  - **'lawfulness, fairness and transparency'**: i.e. that we have a legal base for processing personal information, that we do it fairly and are transparent about what we process
  - **'purpose limitation'**: i.e. that personal data is collected for specified, explicit and legitimate purposes and is not further processed in a way incompatible with those purposes
  - **'data minimisation'**: i.e. that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
  - **'accuracy'**: i.e. accurate and up-to-date
  - **'storage limitation'**: i.e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
  - **'integrity and confidentiality'**: i.e. that personal data is processed in a way that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

In addition, we aim to be accountable in this.

- 2.3 Any written information will be kept in a locked filing cabinet in the Reach4Reality office. Access to these files will be restricted to the Project Staff, Project volunteers with the responsibility for administration purposes (e.g. filing), Trustees responsible for investigating complaints and appropriate staff from regulatory bodies (e.g. our Care Inspector). This is the responsibility of the Project Coordinator. See Section 8 on policy/practice on camp/activities.



- 2.4 Any information stored electronically, for example on a computer, mobile phone, memory stick or other device will be password protected or, if appropriate, encrypted.
- 2.5 Written and/or electronic information kept on each **young person** would normally only include:
- the referral (application) form and supporting data e.g. Child Plan
  - supervision notes and appropriate background information
  - Personal Plan
  - befriending/contact record sheets
  - pre-camp and post-camp visit assessments, evaluation and camp monitoring notes and reports
- 2.6 Personal information included in this might include:
- Name, date of birth (DOB), address, emergency contact details
  - Diagnosis and other medical information, e.g. medication required
  - Other family details/background, including next of kin, educational information
  - Other care and support needs
  - Religious preferences
  - Photos
- 2.7 Written and/or electronic information kept on **family members** would normally only include:
- Name, address of parents, siblings, other relevant family members/carers
  - Contact details of 2 main carers/emergency contacts
  - Health information and next of kin, if for example a family member is coming on a family camp
  - Photos if taking part in activities
- 2.8 Written and/or electronic information kept on each **member of staff** would normally only include:
- Name, address, DOB, contact details (phone numbers, email address)
  - Health information, next of kin, emergency contact details
  - Details of experience and qualifications provided during recruitment process
  - References received as part of the recruitment process
  - PVG membership number and relevant disclosure information
  - Holiday record, timesheets, expenses/mileage claims, sick leave
  - Details of training and qualifications gained during employment
  - Supervision and appraisal records
  - Records relating to complaints, grievance or disciplinary procedures
  - Photos
  - Religious preferences
  - Bank account information, national insurance number etc for payroll and HMRC purposes
- 2.9 Written and/or electronic information kept on each **volunteer** (including Trustees) would normally only include:
- Name, address, DOB, contact details (phone numbers, email address)
  - Health information, next of kin, emergency contact details



- Details of relevant experience, qualifications and training
  - References received as part of the recruitment process
  - PVG membership number and relevant disclosure information
  - Supervision and appraisal records
  - Records relating to complaints
  - Photos
  - Religious preferences
  - Bank account information for payment of expenses/mileage
- 2.10 Written and/or electronic information kept on each **supporter/donor** would normally only include:
- Name, address, contact details or other details necessary for Gift Aid purposes
- 2.11 Written and/or electronic information kept on **other professionals** would normally only include:
- Name, work role, work contact details (phone numbers, address, email)
- 2.12 For more information on these, please see Appendix 1 for our Privacy notices for each group of people.

### **3. Legal bases for holding and processing information**

- 3.1 Reach4Reality will only hold and process data for which we have a legal base for holding and processing that information.
- 3.2 Please see Appendix 1 for our privacy notices which provide information on the legal bases, but generally the following apply:
- 3.3 Information on young people: Contract: i.e. provision of a care service, following receipt of an application form
- 3.4 Information on family members: Contract i.e. provision of a care service
- 3.5 Information on staff: Contract i.e. Contract of employment and in accordance with job description
- 3.6 Information on volunteers: Contract i.e. Legal Obligation
- 3.7 Information on other professionals: Legitimate purpose
- 3.8 Information on donors/supporters: Consent
- 3.9 Photos of young people/family members: Consent
- 3.10 Photos of staff: Contract
- 3.11 Photos of volunteers: Consent

### **4. Accuracy**

- 4.1 Reach4Reality will check for accuracy and update records annually when a young person's Personal Plan is reviewed or when staff/volunteer appraisal is carried out.
- 4.2 Between times, it is the responsibility of the data subject to notify Reach4Reality of any change in personal information, as soon as is practicable after the change occurs.



## 5. Retention

Personal data held on an individual will be retained for as long as required for the purposes it was obtained for, but in line with statutory requirements:

- 5.1 Young persons' individual file: 7 years after the termination of our involvement with the young person, other than
- 5.2 Accident Reports: to be retained 25 years after the accident
- 5.3 Record of medication: to be retained 25 years after medication given
- 5.4 Staff files: to be retained 25 years from date of leaving
- 5.5 Information on volunteers working with young people: to be held 25 years from date of leaving

For more information on retention, please see Appendix 2 for our Privacy notices for each group of people.

## 6. Confidentiality and Data Sharing

- 6.1 Reach4Reality adopts the "Highland Child Protection Policy Guidelines" 2016 and "Data Sharing across the Highland Data sharing Partnership- Procedures for Practitioners". See Appendix 2 for further information.
- 6.2 Any personal information a staff member or volunteer learns regarding a young person or his or her family shall remain confidential, unless sharing is necessary for child protection.
- 6.3 Project staff/volunteers must not divulge or disclose the identity of a particular young person or family to anyone outside the project.
- 6.4 Project staff will only discuss relevant personal information with other project staff/volunteers in the context of camp provision and evaluation, supervision, support or training.
- 6.5 Reach4Reality will not divulge personal details of young people to outside agencies or individuals without the young person's knowledge or consent as below.

## 7. Consent regarding sharing of information

7.1 The procedures state:

- In most cases using legislation to assess whether to share information will only be relevant where consent for sharing has not been given.
- Where consent has been given and there is a need to know, information may be shared.
- Where consent has not been given, but there is a need to know, legislation assists the practitioner to decide whether sharing should take place.
- If information is to be shared to prevent harm, to prevent or detect crime, to improve the wellbeing of individuals or groups, or for public protection, and if the information to be shared is relevant and proportionate, then it should be shared.
- If a child is considered to be at risk of harm, relevant information must be shared.

## 8. Policy on Confidentiality at Camp

- 8.1 Team Leaders will hold copies of **relevant and proportionate** personal information at camp. This might include the following: profile of young person,



- health form, consent form, record of medication, individual risk assessment, emergency contacts.
- 8.2 This information is kept in a separate **Camp** folder, accessed only by the adult team members on request, being the responsibility of the Team Leader. This file will be kept in a locked storage box.
  - 8.3 Junior Leaders at camp will only be allowed access to any profiles and risk assessments and at the discretion of the Team Leader.
  - 8.4 After the camp, these information copies will be returned to the individual young persons' file or shredded.
  - 8.5 The practice of Reach4Reality regarding the disclosure of any further information during a camp, is one of 'team confidentiality', i.e no individual team member should withhold information from the Team Leader. When a young person discloses information of a personal or sensitive nature, it will be explained to them that because the information is important, it will be shared with the Team Leader.

### **9. Access – Personal**

- 9.1 Any person about whom Reach4Reality holds personal information, may request, in writing, from the Project Coordinator, or other staff member, to see this information at a mutually suitable time.
- 9.2 This might also include information on the purposes of processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed, and the envisaged period for which the personal data will be stored.
- 9.3 **Right to rectification:** If there are any inaccuracies found in the information, there would be a discussion and an agreement of changes sought between the person and the Project Coordinator/staff.
- 9.4 **Right to erasure:** the data subject shall have the right to obtain from Reach4Reality the erasure of personal data concerning him without undue delay and Reach4Reality shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
  - a) the personal data are no longer necessary in relation to the original purposes;
  - b) the data subject withdraws consent and where there is no other legal ground for processing;
  - c) the data subject objects to the processing and there are no overriding legitimate grounds for processing;
  - d) the personal data have been unlawfully processed;
  - e) the personal data have been collected in relation to the offer of information society services
- 9.5 **Right to data portability:** the data subject shall have the right to receive the Personal data concerning him or her, which he/she has provided to Reach4Reality, in a structured, commonly used and machine readable format and have the right to transmit those data to another controller without hindrance from Reach4Reality.
- 9.6 **Automated individual decision-making:** Reach4Reality will not make decisions based solely on automated processing.
- 9.7 If agreement concerning access and any of these rights is not achieved, and the situation is still unsatisfactory, the person would have the right to complain through our Complaints Procedure.



## **10. Access – Third Parties**

- 10.1 Reach4reality will not share any personal information with a third party without the consent of the person as stated above, unless there is a legal and statutory duty to share such information.

## **11. Imaging**

- 11.1 Reach4Reality explicitly obtains the written permission of each young person and their carer to be able to take photographic and video images of the young person while attending a Reach4Reality activity. If this is not granted, no photographs of that young person will be taken, or in the event of a young person is identified as appearing in a 'group' scene, their individual image will be erased or the whole photograph deleted.
- 11.2 Reach4Reality will seek consent for photographic/video images for each of the purposes listed below. This will be reviewed annually as part of the review of a young person's Personal Plan, or as part of staff/volunteer appraisal.
- 11.3 No camp team member is allowed to take a photograph or video on a personal mobile phone or any other photographic equipment.
- 11.4 The team leader of the Reach4Reality activity will decide when and by whom photographs or videos can be taken with the express purpose:
- To provide positive memories e.g. Photo CD, certificates
  - To provide evidence of individual progress towards outcomes for feedback
  - To provide suitable promotional material for Reach4Reality publications e.g. Annual report, newsletters, website, publicity leaflet
- 11.4 Photographs or videos will only be kept for an appropriate length of time (i.e. 5 years on leaving the service) unless permission has been given to use for longer e.g. in publicity materials
- 11.5 The images are downloaded on to the Reach4Reality computer for scrutiny, vetting and if necessary erasure (as stated above). These images may be viewed during camp for the enjoyment of the young people. They are later filed into the Reach4Reality computer system and copies made and sent to individuals attending that camp.
- 11.6 Access to the Reach4Reality computer is limited to Reach4Reality staff and occasionally, at the discretion of the Project Coordinator, to volunteers or trustees involved in administration, distribution of newsletters, or technical support.

## **12. Data security**

- 12.1 Taking into the account the state of the art, the costs of implementation, and the nature, scope, context and purposes of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of data subjects, Reach4Reality shall implement appropriate and technical and organisational measures to ensure a level of security appropriate to the risk, including, as appropriate:



- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of processing

This may involve risk analysis, for example through a Data Protection Impact Assessment when the processing is likely to result in a high risk for the rights and freedoms of the data subject, or when existing data is to be used for a new and unexpected or more intrusive purpose.

- 12.2 Reach4Reality will provide training to staff/volunteers on data protection as appropriate.

### **13. Breaches in Data Protection**

- 13.1 Any breach of confidentiality requiring notification that is made by a member of staff/volunteer would be considered misconduct or gross misconduct and be dealt with according to the Disciplinary procedure.
- 13.2 **Breach notification:** In the case of a personal data breach, Reach4Reality shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority (Information Commissioner's Office) **unless** the personal data breach is unlikely to result in a risk for the rights and freedoms of individuals (i.e. a significant detrimental effect on individuals such as discrimination, damage to reputation, financial loss, loss of confidentiality, or any other significant economic or social disadvantage). This will be assessed on a case by case basis.
- 13.3 When the personal data breach is likely to result in a high risk to the rights and freedoms of individuals Reach4Reality shall communicate the personal data breach to the data subject without undue delay. This is NOT required if data is encrypted.
- 13.4 **Breach investigation:** Reach4Reality will investigate any data breach and its cause and make recommendations as to what needs to be put in place to ensure a similar breach does not occur again. This may be the introduction of a new procedure, additional staff training, changes in hardware or software or changes in physical security.
- 13.5 Reach4Reality will record all breaches of data, breach notifications and action following breaches.



## Appendix 1

### Privacy notices:

This Appendix includes our privacy notices for:

- Young people and families
- Staff
- Volunteers
- Supporters
- Fundraisers
- Other professionals

### Privacy notice: young people and families:

This privacy notice tells you about the information we collect from you when you make an application to Reach4Reality and during our ongoing involvement with you. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

**Who are we?:** Reach4Reality is a SCIO, Scottish Charity number: SC 43934

**You can contact us:** [info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)

Any enquiries about our use of your personal data should be addressed to the contact details above.

### What personal data do we collect?:

Personal information we collect on **young people** might include:

- Name, date of birth (DOB), address, emergency contact details
- Diagnosis and other medical information, e.g. medication required
- Other family details/background, including next of kin, educational information
- Other care and support needs
- Religious preferences
- Photos

Personal information on **family members** would normally only include:

- Name, address of parents, siblings, other relevant family members/carers
- Contact details of 2 main carers/emergency contacts
- Health information and next of kin, if for example a family member is coming on a family camp
- Photos if taking part in activities

### Why do we collect this information?

We collect this information so that we can provide a care service to your son/daughter that is tailored to their individual needs.

The legal basis for our collection and processing of this data is a contract, other than for photos or other imaging which will be on the basis of consent.

### What do we do with your information?

Your information is stored in the following ways:

- Paper copies in each young person's individual file in a locked filing cabinet in the Reach4Reality office
- Electronic copies on Reach4Reality desktop computers which are password





protected.

- On camp, paper copies of information are held in a locked file box.

At times it is necessary for us to share information with other professionals e.g. Social work or education, but for more information on this please refer to a copy of our Data Protection and Confidentiality Policy, revised May 2018 which can be found on our website or contact the number/email address below for a paper copy.

### How long do we keep your information for?

Personal data held on an individual will be retained for as long as required for the purposes it was obtained for, but in line with statutory requirements:

1. Young persons' individual file: 7 years after the termination of our involvement with the young person, other than
2. Accident Reports: to be retained 25 years after the accident
3. Record of medication: to be retained 25 years after medication given
4. Photos: 5 years after termination of our involvement unless consent has been given for us to retain longer for publicity purposes.

### Your rights over your information:

As someone about whom we hold personal information, you have the following rights:

**Right of access:** By law, you can ask us what information we hold about you;

**Right to rectification:** You can ask us to correct it if it is inaccurate.

**Right to erasure:** For example if we have processed your information unlawfully.

**Data portability:** You can also ask us to give you a copy of the information.

**Right to object and right to restriction:** You can ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

For more information on this please refer to a copy of our Data Protection and Confidentiality Policy, revised May 2019 which can be found on our website or contact the number/email address below for a paper copy.

To submit a request by email, post or telephone, please use the contact information provided below.

It is your responsibility to notify us of any changes in your personal information as soon as is practicable after the change.

### Your right to complain:

If you have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

Reach4Reality,  
Hilton Light House,  
4 Tomatin Road  
Inverness  
IV2 4UA

07796905339

[info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)



## **Privacy notice: Staff:**

This privacy notice tells you about the information we collect from you when you make an application to Reach4Reality for employment and during your ongoing employment with us.

In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

**Who are we?:** Reach4Reality is a SCIO, Scottish Charity number: SC 43934

**You can contact us:** [info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)

Any enquiries about our use of your personal data should be addressed to the contact details above.

## **What personal data do we collect?:**

Personal information we collect on **staff** might include:

- Name, address, DOB, contact details (phone numbers, email address)
- Health information, next of kin, emergency contact details
- Details of experience and qualifications provided during recruitment process
- References received as part of the recruitment process
- PVG membership number and relevant disclosure information
- Holiday record, timesheets, expenses/mileage claims, sick leave
- Details of training and qualifications gained during employment
- Supervision and appraisal records
- Records relating to complaints, grievance or disciplinary procedures
- Photos
- Religious preferences
- Bank account information, national insurance number etc for payroll and HMRC purposes

## **Why do we collect this information?**

We collect this information to be able to offer employment and so that we can ensure the wellbeing of our staff in the fulfillment of their duties as part of that employment.

The legal basis for our collection and processing of this data is a contract.

## **What do we do with your information?**

Your information is stored in the following ways:

- Paper copies in Project Coordinator's locked filing cabinet in the Reach4Reality office
- Electronic copies on Project Coordinator's desktop computer and on Treasurer's laptop.
- On camp, paper copies of information are held in a locked file box

## **How long do we keep your information for?**

Staff files: to be retained 25 years from date of leaving

Accident Reports: to be retained 25 years after the accident

Bank details: to be retained until termination of contract or for as long as necessary to



fulfill our statutory requirements.

Photos: 5 years after termination of contract, unless consent has been given for us to retain longer for publicity purposes.

### **Your rights over your information:**

As someone about whom we hold personal information, you have the following rights:

**Right of access:** By law, you can ask us what information we hold about you;

**Right to rectification:** You can ask us to correct it if it is inaccurate.

**Right to erasure:** For example if we have processed your information unlawfully.

**Data portability:** You can also ask us to give you a copy of the information.

**Right to object and right to restriction:** You can ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

For more information on this please refer to a copy of our Data Protection and Confidentiality Policy, revised May 2019 which can be found on our website or contact the number/email address below for a paper copy.

To submit a request by email, post or telephone, please use the contact information provided below.

It is your responsibility to notify us of any changes in your personal information as soon as is practicable after the change.

### **Your right to complain:**

If you have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

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[info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)



## **Privacy notice: Volunteers/Trustees:**

This privacy notice tells you about the information we collect from you when you make an application to Reach4Reality for recruitment as a volunteer and during your ongoing involvement with us.

In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

**Who are we?:** Reach4Reality is a SCIO, Scottish Charity number: SC 43934

**You can contact us:** [info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)

Any enquiries about our use of your personal data should be addressed to the contact details above.

## **What personal data do we collect?:**

Personal information we collect on **volunteers/trustees** might include:

- Name, address, DOB, contact details (phone numbers, email address)
- Health information, next of kin, emergency contact details
- Details of relevant experience, qualifications and training
- References received as part of the recruitment process
- PVG membership number and relevant disclosure information
- Supervision and appraisal records
- Records relating to complaints
- Photos
- Religious preferences
- Bank account information for payment of expenses/mileage

## **Why do we collect this information?**

We collect this information to be able to offer you volunteering opportunities, so that we can ensure the wellbeing of our volunteers and in the fulfillment of our duties as a Care Service.

The legal basis for our collection and processing of this data is Legal obligation (Protection of Vulnerable Groups Act 2001, Regulation of Care (Scotland) Act 2001, Public Services Reform (Scotland) Act 2010) and consent for photos.

## **What do we do with your information?**

Your information is stored in the following ways:

- Paper copies in Project Coordinator's locked filing cabinet in the Reach4Reality office
- Electronic copies on Project Coordinator's desktop computer and on Treasurer's laptop.
- On camp, paper copies of information are held in a locked file box

## **How long do we keep your information for?**

Volunteer files: to be retained 25 years from date of termination of involvement

Accident Reports: to be retained 25 years after the accident

Bank details: to be retained until termination of involvement or for as long as necessary to fulfil our statutory requirements.

Photos: 5 years after termination of contract, unless consent has been



given for us to retain longer for publicity purposes.

### **Your rights over your information:**

As someone about whom we hold personal information, you have the following rights:

**Right of access:** By law, you can ask us what information we hold about you;

**Right to rectification:** You can ask us to correct it if it is inaccurate.

**Right to erasure:** For example if we have processed your information unlawfully.

**Data portability:** You can also ask us to give you a copy of the information.

**Right to object and right to restriction:** You can ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

For more information on this please refer to a copy of our Data Protection and Confidentiality Policy, revised May 2019 which can be found on our website or contact the number/email address below for a paper copy.

To submit a request by email, post or telephone, please use the contact information provided below.

It is your responsibility to notify us of any changes in your personal information as soon as is practicable after the change.

### **Your right to complain:**

If you have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

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4 Tomatin Road  
Inverness  
IV2 4UA

07796905339

[info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)



## **Privacy notice: Supporters/donors:**

This privacy notice tells you about the information we collect from you when you sign up to become a supporter or donor of Reach4Reality and during your ongoing involvement with us.

In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

**Who are we?:** Reach4Reality is a SCIO, Scottish Charity number: SC 43934

**You can contact us:** [info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)

Any enquiries about our use of your personal data should be addressed to the contact details above.

## **What personal data do we collect?:**

- Name, address, contact details, e.g. email address, or other details necessary for Gift Aid purposes

We will not sell, rent, share, or otherwise disclose your personal information to anyone out with Reach4Reality, unless we have asked for your express consent to do so.

## **Why do we collect this information?**

We collect this information to be able to be able to keep you informed of our news, prayer requests through our e-newsletter or to process your donations e.g. through Gift Aid.

The legal basis for our collection and processing of this data is consent.

## **What do we do with your information?**

Your information is stored in our contacts list in one.com, outlook and mailchimp. .

## **How long do we keep your information for?**

We will keep your information until you unsubscribe or ask us to delete it, or when an email address becomes invalid (at which time we may contact you by telephone to see if you wish to update your details). Please note you can unsubscribe at any time by contacting [publicity@reach4reality.org.uk](mailto:publicity@reach4reality.org.uk)

## **Your rights over your information:**

As someone about whom we hold personal information, you have the following rights:

**Right of access:** By law, you can ask us what information we hold about you;

**Right to rectification:** You can ask us to correct it if it is inaccurate.

**Right to erasure:** For example if we have processed your information unlawfully.

**Data portability:** You can also ask us to give you a copy of the information.

**Right to object and right to restriction:** You can ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

For more information on this please refer to a copy of our Data Protection and Confidentiality Policy, revised May 2019 which can be found on our website or contact the number/email address below for a paper copy.

To submit a request by email, post or telephone, please use the contact

## Reach4Reality sc043934



Information provided below.

It is your responsibility to notify us of any changes in your personal information as soon as is practicable after the change.

### **Your right to complain:**

If you have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

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[info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)



## **Privacy notice: Other professionals:**

This privacy notice tells you about the information we collect from you when you refer a young person to us, or when we have contact with you regarding a young person to whom we provide a care service.

In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

**Who are we?:** Reach4Reality is a SCIO, Scottish Charity number: SC 43934

**You can contact us:** [info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)

Any enquiries about our use of your personal data should be addressed to the contact details above.

## **What personal data do we collect?:**

- Name, work address, work contact details, e.g. email address, work phone number

We will not sell, rent, share, or otherwise disclose your personal information to anyone out with Reach4Reality, unless we have asked for your express consent to do so.

## **Why do we collect this information?**

We collect this information to be able to be able to liaise with you to ensure a young person's needs and wellbeing are addressed in our provision of a care service to them. We will also contact you with news or updates on our service.

The legal basis for our collection and processing of this data is Legitimate Purpose.

## **What do we do with your information?**

Your information is stored in our contacts list in one.com, outlook and within the young person's paper file. .

## **How long do we keep your information for?**

We will keep your information until you ask us to delete it, or when an email address becomes invalid (at which time we may contact you by telephone to see if you wish to update your details).

## **Your rights over your information:**

As someone about whom we hold personal information, you have the following rights:

**Right of access:** By law, you can ask us what information we hold about you;

**Right to rectification:** You can ask us to correct it if it is inaccurate.

**Right to erasure:** For example if we have processed your information unlawfully.

**Data portability:** You can also ask us to give you a copy of the information.

**Right to object and right to restriction:** You can ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

For more information on this please refer to a copy of our Data Protection and Confidentiality Policy, revised May 2019 which can be found on our website or contact the number/email address below for a paper copy.

To submit a request by email, post or telephone, please use the contact Information provided below.



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It is your responsibility to notify us of any changes in your personal information as soon as is practicable after the change.



### **Your right to complain:**

If you have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

Reach4Reality,  
Hilton Light House,  
4 Tomatin Road  
Inverness  
IV2 4UA

07796905339

[info@reach4reality.org.uk](mailto:info@reach4reality.org.uk)

Reviewed May 2019



**Appendix 2:  
Summary of Highland Data sharing Partnership- Procedures for  
Practitioners:**

**When to share**

Only share when this will lead to improved service provision or improved wellbeing of the young person; if sharing to prevent harm and/or to prevent or detect crime, consent is not required. Consent must offer a real choice and must be informed and recorded.

**What to share**

Only share what is proportionate and relevant to the objectives of the particular instance of data sharing. Security of shared data remains the responsibility of the originating agency. Shared data may not be shared further without the permission of the originating agency. Shared data should not be retained longer than necessary.

**Who to share with**

Only share with people who have an identified need-to-know. Even when consent is given, the practitioner is responsible for deciding what it is appropriate to share and with whom. Keep brief records of data sharing.

**How to share**

Make sure you can't be overheard if sharing verbally. Only use secure e-mail. Only use fax when there is no alternative and take precautions to ensure that only the intended recipient receives the information. Portable devices used to store personal data must be encrypted. Report immediately the loss of theft of any portable device which contains personal information.