

## **Privacy Statement**

### **Your Privacy**

Cottington Close RMO working in Partnership with Lambeth Council, is committed to protecting your privacy when you use our services.

The Privacy Notice below explains how we use information about you and how we protect your privacy.

If you have any concerns or questions about how we look after your personal information, please contact the RMO on 020 7926 8105 or email [CottingtonClose@lambeth.gov.uk](mailto:CottingtonClose@lambeth.gov.uk)

### **Why we use your personal information?**

#### **Do you know what personal information is?**

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person. For example, this could be your name and contact details.

#### **Did you know that some of your personal information might be 'special'?**

Some information is 'special' and needs more protection due to its sensitivity. It is often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal your:

- sexuality and sexual health
- religious or philosophical beliefs
- ethnicity
- physical or mental health
- trade union membership
- political opinion
- genetic/biometric data
- criminal history

#### **Why do we need your personal information?**

We may need to use some information about you to:

- deliver services and support to you
- manage those services we provide to you
- train and manage the employment of our workers who deliver those services
- help investigate any worries or complaints you have about your services
- keep track of spending on services
- check the quality of services
- to help with research and planning of new services

How the law allows us to use your personal information:

There are several legal reasons why we need to collect and use your personal information.

Generally, we collect and use personal information in the where:

- you, or your legal representative, have given consent
- you have entered into a contract with us
- it is necessary to perform our statutory duties
- it is necessary to protect someone in an emergency
- it is required by law
- it is necessary for employment purposes
- you have made your information publicly available
- it is necessary for legal cases
- it is to the benefit of society as a whole
- it is necessary for archiving, research, or statistical purposes

If we have consent to use your personal information, you have the right to remove it at any time. If you want to remove your consent, please contact us.

We only use what we need!

Where we can, we will only collect and use personal information if we need it to deliver a service or meet a requirement.

If we do not need personal information, we will either keep you anonymous if we already have it for something else or we will not ask you for it. For example, in a survey we may not need your contact details, so we will not ask for it in your responses.

If we use your personal information for research and analysis, we will always keep you anonymous or use a different name unless you've agreed that your personal information can be used for that research.

We do not sell your personal information to anyone else.

What you can do with your information

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

You can ask for access to the information we hold on you

We would normally expect to share what we record about you with you whenever we assess your needs or provide you with services.

However, you also have the right to ask for all the information we have about you and the services you receive from us. When we receive a request from you in writing, we must give you access to everything we have recorded about you.

However, we cannot let you see any parts of your record which contain:

- Confidential information about other people; or
- Data a professional think will cause serious harm to your or someone else's physical or mental wellbeing; or
- If we think that giving you the information may stop us from preventing or detecting a crime

This applies to personal information that is in both paper and electronic records. If you ask us, we will also let others see your record (except if one of the points above applies).

If you cannot ask for your records in writing, we'll make sure there are other ways that you can. If you have any queries about access to your information, please contact us.

You can ask to change information you think is inaccurate

You should let us know if you disagree with something written on your file.

We may not always be able to change or remove that information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

You can ask to delete information (right to be forgotten)

In some circumstances, you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place
- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it)
- Where there is no legal reason for the use of your information
- Where deleting the information is a legal requirement
- Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we cannot delete your information where:

- we are required to have it by law
- it is used for freedom of expression
- it is for, scientific or historical research, or statistical purposes where it would make information unusable
- it is necessary for legal claims

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate information, and have told us of it
- where we have no legal reason to use that information, but you want us to restrict what we use it for rather than erase the information altogether
- When information is restricted it cannot be used other than to securely store the data and with your consent to handle legal claims and protect others, or where it's for important public interests of the UK.
- Where restriction of use has been granted, we will inform you before we carry on using your personal information.

You also have the right to ask us to stop using your personal information for any RMO service. However, if this request is approved this may cause delays or prevent us delivering that service.

Where possible we will seek to comply with your request, but we may need to hold or use information because we are required to by law.

You can ask to have any computer made decisions explained to you, and details of how we may have 'risk profiled' you.

You have the right to question decisions made about you by a computer, unless it is required for any contract you have entered into, required by law, or you've consented to it.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health conditions.

### **Who do we share your information with?**

We use a range of organisations to either store personal information or help deliver our services to you. Where we have these arrangements there is always an agreement in place to make sure that the organisation complies with data protection law.

Sometimes we have a legal duty to provide personal information to other organisations. This is often because we need to give that data to courts, including:

- if the court orders that we provide the information; and
- if someone is taken into care under mental health law

We may also share your personal information when we feel there is a good reason that's more important than protecting your privacy. This does not happen often, but we may share your information:

- in order to find and stop crime and fraud
- or if there are serious risks to the public, our staff or to other professionals
- to protect a child
- to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them

For all these reasons the risk must be serious before we can override your right to privacy.

If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we will make sure that we record what information we share and our reasons for doing so. We will let you know what we have done and why if we think it is safe to do so.

### **How do we protect your information?**

We will do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what is called a 'cypher'. The hidden information is said to then be 'encrypted'

Pseudonymisation, meaning that we will use a different name so we can hide parts of your personal information from view. This means that someone outside of the RMO could work on your information for us without ever knowing it was yours

Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it

Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong

Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches)

### **Where in the world is your information?**

Most of the personal information is stored on systems in the UK. But there are some occasions where your information may leave the UK either in order to get to another organisation or if it is stored in a system outside of the EU.

We have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We will take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

If we need to send your information to an 'unsafe' location, we will always seek advice from the Information Commissioner first.

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

There is often a legal reason for keeping your personal information for a set period of time, we try to include all of these in our retention schedule.

For each service, the schedule lists how long, your information may be kept for. This ranges from months for some records to decades for more sensitive records.

### **Where can I get advice?**

If you have any worries or questions about how your personal information is handled please contact the RMO dialling 020 7926 8105

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

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

Telephone: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit [ico.org.uk](http://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk)

### **Cookies (not the edible ones) and how you use this website**

To make this website easier to use, we sometimes place small text files on your device (for example your iPad or laptop) called cookies. Most big websites do this too.

They improve things by:

- remembering the things, you've chosen while on our website, so you don't have to keep re-entering them whenever you visit a new page
- remembering data, you've given (for example, your address) so you don't need to keep entering it
- measuring how you use the website so we can make sure it meets your needs

By using our website, you agree that we can place these types of cookies on your device.

To learn more about cookies and how to manage them, visit [AboutCookies.org](http://AboutCookies.org) or watch a video about cookies.

Unless the law allows us to, we do not:

- share any of the data we collect about you with others, or
- use this data to identify individuals

### **Other people's cookies**

We use videos from YouTube and feeds from other websites such as Facebook and Twitter. These websites place cookies on your device when watching or viewing these pages.

### **Turning off cookies**

You can stop cookies being downloaded on to your computer or other device by selecting the appropriate settings on your browser. If you do this, you may not be able to use the full functionality of this website.

There is more information about how to delete or stop using cookies on [AboutCookies.org](http://AboutCookies.org)

Further guidance on the use of personal information can be found at [ico.org.uk](http://ico.org.uk)

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