



Birmingham Child Contact Centre

Privacy Policy / Privacy Notice

(Incorporating General Data Protection Regulations (GDPR 2018))

This Policy has been created in collaboration with the Information Commissioners Office and should be read in conjunction with BCCC's Information Security Policy.

Our Privacy Policy / Privacy Notice explains:

- Contact Details
- What information we collect, use and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep your information
- Who we share information with
- Changes to this Policy / Notice
- How to complain

How to Contact Us :

By Telephone: Volunteers & Families Coordinator: 07916 742321

By Email: Initially via Volunteers@birmccc.org.uk

BCCC's Data Controller can be contacted by emailing info@birmccc.org.uk and adding "FAO Data Controller" in the subject line.

What information we collect, use, and why

BCCC collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Service use history
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about support requirements
- Information about lifestyle, interests or personal history
- Criminal offence data
- Records of meetings and decisions
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery and third-party referrals**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Health information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Tax payer information (for Gift Aid purposes)

We also collect or use the following special category information to **receive donations or funding and organise fundraising activities**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

We also collect or use the following special category information to **comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Witness statements and contact details
- Relevant information from previous investigations
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **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. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy policy / notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Our services are delivered to children, and cover their interactions with family members. Specific information is necessary for the benefit of Safeguarding, understanding familial and relationship risks including substance abuse, potential coercion and various forms of mental and physical abuse in order to provide our services to the benefit of children. Working at the

direction of family courts requires us to use information contained in their directions and to collect data to ensure compliance.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Our services are delivered to children, and cover their interactions with family members. Specific information is necessary for the benefit of Safeguarding, understanding familial and relationship risks including substance abuse, potential coercion and various forms of mental and physical abuse in order to provide our services to the benefit of children. Working at the direction of family courts requires us to use information contained in their directions and to collect data to ensure compliance.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Our services are delivered to children, and cover their interactions with family members. Specific information such as Safeguarding, understanding familial and relationship risks including substance abuse, potential coercion and various forms of mental and physical abuse may well be part of any query, complaint or claim that is communicated. Working at the direction of family courts requires us to use information contained in their directions and to collect data to ensure compliance. Queries, complaints or claims may require investigation as a result of such directions.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- **Vital interests** – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- **Public task** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you e.g Referral Form, meetings, discussions
- Regulatory authorities
- Family members or carers
- Other health and care providers
- Social services
- Charities or voluntary sector organisations
- Councils and other public sector organisations
- Family Courts
- Solicitors

How long we keep information

For information on how long we keep personal information, see our retention schedule below

File Type	Retention Period
HR and Volunteer related files This includes any training and character references for volunteers	Securely disposed of six years after volunteering ceases. The reason for this is that Health & Safety Training records must be kept for a minimum of six years. However, volunteer blogs on our website will be retained whilst ever we operate.
Disclosure and Barring Service Certificates	We keep a record of the date of the check, the vetting decisions and outcome until following DBS results or the volunteer leaves.
Referral Records (Paper Based) including court orders, CAFCASS involvement, Pre-contact Visit Forms and attendance records	Paper records securely disposed of five years after the last contact session.
Referral Records (Electronic) including court orders, CAFCASS involvement, Pre-contact Visit Forms and attendance records	Will be kept indefinitely as children can legally request their information up to the age of 25 years through Local Authorities.
Accident books Health & Safety Records RIDDOR	Legal requirements are Accident books are a minimum of 3 years, Health and Safety Training Records minimum 6 years and RIDDOR minimum 40 Years. BCCC will convert and hold these records electronically and hold indefinitely.
Finance records	Legal Requirements. Records kept for minimum of 6 years except in the case of Grantholders, who may request longer timescales.

Who we share your information with

Others who we share personal information with

- Charities and voluntary organisations i.e. contact centres previously used
- Organisations we need to share information with for safeguarding reasons
- Legal bodies or authorities
- Local authorities or councils
- External auditors or inspectors e.g. National association of Child Contact Centres (NACCC)
- Organisations we're legally obliged to share personal information with
- Third parties:
 - Solicitors
 - Family Courts

Information security

We are working to protect your personal information that we hold, its confidentiality, integrity and availability.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- We restrict access to personal information to Contact Centre staff and volunteers subject to strict contractual confidentiality obligations and they may be disciplined or terminated if they fail to meet

these obligations.

- We have a Security Information Policy in place which defines the measures we take to protect your personal information. We use a combination of technology and procedures to ensure that our paper and computer systems are protected, monitored and recoverable (in the case of electronic information).
- We may keep limited paper-based records; these records are kept under lock and key with CCTV security within the area.

Changes to this Policy / Notice

This Privacy Policy / Privacy Notice is reviewed annually and may change, however, we will not reduce the rights of individuals below those required by UK Law in force at the time of the change.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>