

**BLACK ISLE CARES – PRIVACY NOTICE (GENERAL)**

**1. Who are we?**

Black Isle Cares (BIC) is a Scottish Charitable Incorporated Organisation registered in Scotland. We are a registered charity (SC045371).

You can contact us:

Email: admin@blackislecares.com

Address: Black Isle Cares, Black Isle Leisure Centre, Deans Road, Fortrose. IV10 8TJ

Phone: 07702 557535

Any enquiries about our use of your personal data (including any requests to exercise your rights in relation to your data) should be addressed to the contact details above.

Black Isle Cares is a ‘data controller’ of the personal data that you provide to us. This means that we are responsible for deciding how we hold and use personal information about you.

**2. What is a privacy notice?**
It is essential that anyone using BIC’s services feels safe to do so and has absolute confidence that any information they share is kept private. This privacy notice will help you understand what information we collect, why we collect it, how we store and use it, and if we disclose the information to anyone else. It will also explain what rights and choices you have regarding your personal information.

**3. Our** **lawful basis** for processing data is “consent” and those using our services will be asked to give their consent for BIC to process their data. This is the term used to describe the lawful basis as per the General Data Protection Regulation (GDPR).

We need to collect and store basic information to provide quality services. As a registered charity, BIC also needs to provide evidence to funders about the work we have done, including financial and statistical information. Our data processing enables us to do this effectively and client data will always be anonymised for this purpose.

**4. The information we collect**
Most of the personal data we process is provided to us directly by those using our services. We receive personal information from the people who:

* Use our services (e.g. for Meals at Home or Befriending services)
* Contact us via social media, email, or by writing
* Contact our staff and volunteers
* Make a complaint to us
* Make a donation to us

There is no requirement for you to disclose personal information, and we can support you anonymously. However, our ability to provide a quality service may be impacted if we are unable to store personal data. You will be given the opportunity to sign a consent form when you first register with the service.

* The information that we collect and process includes:
* Personal identifiers (e.g. name, age, contact details, and gender)
* Service information (e.g. assessment notes, referral forms)
* Feedback (e.g. evaluations, complaints, and surveys)
* Donations (e.g. name, contact details, payment information)
* Agency information (e.g. name, email address, and contact details)

People using our services may share sensitive personal data. This relates to information about your health, sexual orientation, ethnicity, political opinions, or religious or philosophical beliefs. We will not record any sensitive information about you without your explicit consent.

**5. Why we collect information**
We take your privacy seriously and we only use this information for the purpose for which it was provided.
We collect and use personal information to:
• Provide appropriate support;
• Monitor and improve the quality and accessibility of our services;
• Report to funders on the work we carry out;
• Comply with the law regarding safeguarding and data sharing

**6. What information is shared**
It is essential that anyone accessing our services feels safe to do so and has confidence that their personal information will not be shared outside the organisation without their explicit consent. This section outlines the limits to our confidentiality and what information is shared. As a charity, we are required to report to funders about the work we do. This includes aggregated data (i.e. anonymous information) about who we support and the impact we have. We will never share this information in a way that could identify you.
Personal data may also be shared with other companies that provide services on our behalf. For example, donation information may be shared with auditors. Any third-party service providers would be required to take appropriate security measures to protect your personal information and are not permitted to use your personal data for their own purposes. There are also instances where we are required, by law, to share personal information. This includes situations where we consider your welfare, or the welfare of others, to be seriously at risk. For example, if a vulnerable adult is at risk of harm. We are also obliged to disclose certain statutory offences, such as drug trafficking or terrorism. In situations where we have a duty to disclose, we will always try to obtain your consent and keep you informed.

**7. How we store your personal information**
We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction, and they are subject to a duty of confidentiality.

**8. How long will we store your personal information**
Your information is securely stored and only held for as long as is necessary. After which point, we will securely destroy any personal data.

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| **Where Is It Stored?** | **How Long Is It Kept?** |
| **People using our services** All personal data is stored securely on an individual’s case file on our digital case management system. This includes information such as contact details, next of kin/ emergency contact details and assessment information regarding health or disability. | **Individual case file** For 1 year from your last contact with the service. **Translation & Interpretation** BIC may use a third-party for anyone requiring translation or interpretation. Any third-party service will not retain any identifiable personal information. |
| **People working or volunteering for BIC**Volunteers, staff and trustees will have recruitment information, contact details and other HR-related information stored in our digital case management system. | **Individual case file** For 3 years after leaving employment or involvement with the organisation.  |
| **People who contact our services** We will store copies of any necessary emails, texts, or letters on an individual’s case file (as above). BIC also processes personal data of individuals who are connected to our service-users. This includes contact details for work with other agencies, where consent has been given by the service-user. | **Email / text system** We will retain emails, text messages and letters for 1 year from your last contact with the service.  |
| **People who contact us via social media** BIC has Facebook and Instagram accounts. Please be aware that anything that you post to these accounts will be public. Messages sent by social media are subject to the privacy notices of the relevant companies running these services. | **Messaging** Private messages will be stored for 1 year. We reserve the right to delete any posts that may impact the wellbeing and/or reputation of any individual or organisation. |
| **People who contact us via the website** Our website does not store personal data that is sent via the ‘contact us’ form. This is sent directly to our secure email account and deleted from the site. Anonymised website usage information is collected through the use of ‘cookies’. | **Email** We will delete information from our email within 6 months. |
| **People who make a complaint to BIC** A complaint file usually contains the case number or name of the complainant and any other individuals involved. This file is kept securely on the BIC data system and access will be restricted on a ‘need to know’ basis. | **Complaints** We will keep complaint files for 3 years from closure to enable us to assess any patterns over time. |
| **People who donate to BIC** Personal data may also be provided as part of one-off or regular donations to BIC. This may include someone’s name, payment information, and contact details. This information is processed by BIC to meet our financial reporting duties. | **Financial data** One-off donations without Gift Aid are kept for 2 years and regular donations without Gift Aid are kept for 2 years since the last donation. Donations with Gift Aid and grants information is kept for 7 years. |
| **Safeguarding** There may also be instances where we need to process personal data to protect someone’s wellbeing or life. For example, if a vulnerable adult is at risk of serious harm. This information will be stored on the individual’s case file (see above). | **Individual case file** For 5 years from your last point of contact with the service.**Third parties** Information shared with statutory bodies, such as the Police or Adult Support & Protection is subject to their data protection privacy notices. |

 **9. Your data protection rights**
Under data protection, your rights include:

* Right of access: You have the right to ask us for copies of your personal information
* Right to rectification: You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
* Right to erasure: You have the right to ask us to erase your personal information in certain circumstances.
* Right to object or restrict processing: You have the right to ask us to restrict or object to the processing of your personal information in certain circumstances.
* Right to complain: You have the right to complain to us or submit a complaint to the Information Commissioner's Office.

You can make a request verbally or in writing. We will respond to you within one month from the request. You are not required to pay any charge for exercising your rights.

**10. How to complain or submit a query**
Please contact us at the details below if you wish to make a request, a complaint, or would like more information on our data collection and processing. We will respond to you within one month. You can also complain to the ICO if you are unhappy with how we have used your data.

**Black Isle Cares**
Data Protection Controller
Address: Black Isle Cares, Black Isle Leisure Centre, Deans Road, Fortrose. IV10 8TJ
Email: admin@blackislecares.com

Phone: 07702 557535
Website: [www.blackislecares.com](http://www.blackislecares.com)

**Information Commissioner’s Office**
Information Commissioner’s Office
Wycliffe House Water Lane
Wilmslow
Cheshire SK9 5AF
Helpline: 0303 123 1113
Website: <https://www.ico.org.uk>