



THE MAZE GROUP CiC

Privacy Notice

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Policy Approval

Approved By	Susan Anderton
Position	Executive Director
Date	23 rd May 2018

Issue and Revision Log

Issue	Date Issued	Description of Revision		Reviewed by	Authorised by
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Privacy notice for parents/carers, volunteers, other service users and visitors to MAZE's website/Facebook page

Under data protection law, individuals have a right to be informed about how the MAZE Group CiC ("MAZE") uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, The MAZE Group CiC, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice

Our data protection officer is Susan Anderton (see 'Contact us' below).

The personal data we hold

Personal data that we collect, use, store and share (when appropriate) about you are:

- Contact details including names, addresses, email addresses, telephone numbers, contact preferences, date of birth, identification documents
- Date of birth
- Gender
- Marital status and dependents
- Next of kin and emergency contact information
- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, ethnic background and special educational needs,
- Information required to make reasonable adjustments for service users and volunteers
- Details of any medical conditions, including physical and mental health
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs that you have agreed we can take and use during the course of MAZE activities

For volunteers, we additionally hold the following data:

- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Absence data
- Copy of driving licence
- Photographs

We may also hold data about parents/carers and their families that we have received from other organisations, including schools and local authorities.

Why we use this data

We use this data to:

- Provide MAZE services to parents/carers and other service users
- Assess the quality of our services
- Carry out equal opportunities monitoring

- Carry out research
- Comply with the law, Perform any contracts MAZE has entered into

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you as a volunteer or service user.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. Our legitimate interests are:
 - To provide the full range of MAZE services for the benefit of service users and the local community
 - To support and manage MAZE's volunteer group effectively
 - To provide support and training to service users
 - To manage MAZE finances and general business activities effectively

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of this data

We use your data for the following purposes:

- For service users:
 - a. To provide you with the full range of MAZE services
 - b. To deal with any questions or queries you raise
 - c. To respond to any requests for support you make to MAZE
 - d. To process any payments you make to MAZE for using MAZE services
 - e. To deal with any health and safety or safeguarding issues that arise through the course of providing you with MAZE services
 - f. Where necessary, to comply with legal requirements and administer any contractual arrangements we have put in place with you
 - g. Equal opportunities monitoring
- For volunteers:
 - a. To recruit MAZE volunteers
 - b. To manage MAZE volunteers
 - c. To monitor and assess volunteer performance
 - d. To provide training
 - e. To process expenses claims
 - f. General administration and planning of MAZE activities and programmes
 - g. Ascertaining volunteer fitness to work

- h. Undertaking security checks including DBS
- i. Complying with health and safety obligations
- j. Equal opportunities monitoring

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In circumstances notified to you at the time a request for consent is made, with your explicit written consent.
2. Where we need to carry out our legal obligations
3. Where it is needed in the public interest, such as for equal opportunities monitoring

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. Very rarely, where the law allows us to do so, it may also be necessary to process information to safeguard children or an individual at risk of neglect or physical, mental or emotional harm, or to protect the physical, mental or emotional well-being of an individual

How is your personal information collected?

We collect personal information about you either directly from you or sometimes from third parties including.

We will collect additional personal information in the course of your participation in MAZE services

The information we collect about parents/carers and their families is provided voluntarily. We require volunteers to provide sufficient information to enable MAZE to make an accurate assessment as to the suitability of a volunteer to be recruited and continue to act as a volunteer. If a volunteer does not provide MAZE with information required to assess suitability, MAZE will not be able to proceed with an application to become a volunteer and may terminate any existing volunteer agreement or arrangement in place.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data storage and security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those MAZE personnel and delivery partners who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from Susan Anderton.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Data sharing

We do not share information about parents/carers and their families with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or permitted (and it complies with data protection law) we may share your personal information with:

- Our auditors
- Survey and research organisations
- Health authorities
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Parents/Carers rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the MAZE holds about them.

If you make a subject access request, and if we do hold information about you or your family, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Mrs Susan Anderton, the MAZE Group CiC, PO Box 1035, Bentley, Ipswich, Suffolk, IP9 2WL.