



THE NATIONAL HOUSE PROJECT

Policy Title	The Care Leavers Support Portal Privacy Policy
Purpose and Description	This Privacy Policy explains how we process the personal information you provide to us in accordance with the General Data Protection Regulation (GDPR). Any personal information shall be processed in accordance with data protection law.
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1. Introduction

The National House Project (NHP) is a registered charity (charity number 1179743). Our registered address is; The National House Project, Couzens Building CO3A, Crewe Green Road, Crewe, Cheshire, CW1 5DU.

This Privacy Policy explains how we will process the personal data you provide to us in accordance with the General Data Protection Regulation (GDPR) when you access the Care Leavers Support Portal (CLSP). Any personal information shall be processed in accordance with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Further details of which are available from the Information Commissioner's website: www.ico.gov.uk

By submitting your information to us, you consent to the use of that information as set out in this policy.

We understand the value we all put on our personal data, which is why we're careful to protect the information we hold and keep check to ensure we only hold the data we need.

What follows is an overview of how we look after your personal data and why. We're also happy to answer specific questions you may have. Please email us via careleaversupport@thehouseproject.org

Below is a summary of some key terms of this Privacy Policy. We are committed to protecting your personal information when you use the CLSP and we want you to be confident that your personal information is safe and secure with us. This Privacy Policy explains how we process your personal information including the following:

- where we collect your personal information from;
- what personal information we collect;
- how we use your personal information;
- who your personal information is shared with; and
- the rights and choices you have when it comes to your personal information

2. Revisions

This policy was developed on 15.10.2021. There have been no revisions to this policy.

3. Privacy Principles

We will never sell or swap personal data.

Only members of the NHP, or data processors working on behalf of the NHP who need information to do their job can access information in respect of data subjects.

We're especially sensitive when engaging vulnerable children and adults through our services, policy, campaigns and communications activity.

We work hard to safeguard your information through security policies and protocols. We recognise that data protection is an ongoing commitment, not a one-off policy.

4. When will we process your information?

We will process your personal information (e.g. your name, email address and phone number) when:

- You are a staff member within a Local Authority who has a technical and administerial role in the setting up and oversight of the CLSP.
- You are a young person who signs-up to access the CLSP via your Local Authority
- You are a staff member within a Local Authority defined as a key contact for young people (as identified by your Local Authority)

5. How do we process your personal information?

The personal data of young people signed up to use the CLSP is provided by the relevant and responsible Local Authority (the data controller).

We also process other data about Local Authority staff members, and information about local and national services which is stored on CLSP.

In this case, almost all the information we process comes directly from the data controller, or in the case of local and national services, is information that is readily available online to members of the public already. Data subjects can decide what data we hold, and why, from the very start. Whilst some information about national services will be recorded on the CLSP by NHP, local services would be added by the Local Authority.

6. What information do we process?

If you are a young person within a Local Authority, we process the following data:

- Name, address, email address and telephone number. This information is gathered for the purpose of accessing the CLSP and creating a record.
- An uploaded copy of your Pathway Plan, Education, Health and Care Plan (EHCP) and Health Passport. This is an optional upload that will be stored securely on your own profile. This will be uploaded by your Local Authority but will be restricted so that only you can see this.
- Profile photographs (should you wish to add one).
- All of your data is obfuscated (hidden) from the NHP. However, in order to process your data, the NHP and data processors working on behalf of the NHP, do have the ability to override this obfuscation to provide technical support and assistance to your Local Authority in the use of the system should they require it. We will only do this at the request of your Local Authority and a record is kept of this, as well as an alert sent to your Local Authority system administrators when this happens.

- Only team members within directly relevant service lines will have access to the otherwise restricted files.
- You will have the option to access a chat function which allows you to chat with other young people leaving care within your Local Authority. However, in doing so, your full name and personal details will be hidden from other users although you will have the option to add your own name should you wish. Local Authority administration staff will have access to review this chat and will be able to identify you within that chat as a user should they need too.
- Should you move out of your Local Authority area and into another Local Authority (LA), you can request information about services in your new LA area. To enable this to happen, both LAs would need to be signed up to having the CLSP and agree the transfer. Only when this has been agreed should the new LA be able to see details such as your full name/address.

If you are a member of Local Authority staff, we process the following data:

- Name, contact number, and email address used to provide log-in to the CLSP.
- Name, contact number, and email address if you are a key contact for young people within your Local Authority. This information will be input by Local Authority administrators and will be accessible to young people using the CLSP.
- Profile photographs (should you wish to add one).

7. Analytics

The NHP will be able to generate data relating to CLSP access numbers, and usage numbers of CLSP per Local Authority. However, this data will not be identifiable or user specific.

8. What do we do to protect your data?

We ensure there are clear standard operating procedures in place for handling data. This includes limiting access to personal data to individuals who must log in with a unique username for access, and also features two-factor authentication.

We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line from improper access, use, alteration, destruction and loss.

How to best protect yourself and your personal information

To protect yourself when sending us sensitive information, please ensure that you use devices running supported operating systems that are regularly patched and incorporate some form of malware protection. Only connect your devices to networks that you trust.

Securing your passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts our website, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.

All passwords will be encrypted, and no one will ask for your password.

We ensure the software, hardware and underlying operating systems are patched with the latest security implementations and use end-to-end encryption (SSL) to ensure the safety of data in transit. We challenge and review our processes on a regular basis to keep step with changing technology and expectations.

All transactions, and the user that performed them, are audited within the system to ensure a transparent trail of access and updates can be reviewed at any point. This ensures that the users are responsible for their use of the system when dealing with sensitive

Whilst we strive to protect your personal information, due to the nature of the internet we cannot totally guarantee the security of any of the information you transmit to us. With this in mind transmission is at your own risk and we urge you to take every precaution to protect your personal information whilst you are online.

9. How long do we hold your information for?

Your personal information will not be retained for any longer than is necessary for the lawful purposes for which it has been collected and processed. This is to ensure that your personal information does not become inaccurate, out of date or irrelevant.

10. Your choice

You have a number of rights in relation to your data.

To be informed - This Privacy Notice provides the information you are entitled to receive

Access - You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for automated decision making.

You can make a request free of charge. Please make all requests for access in writing and provide us with evidence of your identity. Please make a request in writing to by writing to careleaversupport@thehouseproject.org or Data Protection, NHP, Couzens Building CO3A, Crewe Green Road, Crewe, CW1 5DU.

Rectification - You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure or right to be forgotten - You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent or where we have no lawful basis for keeping it.

Restrict processing - You can ask us to restrict the personal information held about you where you have asked for it to be erased or where you have objected to our use of it.

Data Portability - You can ask to provide you or a third party with some personal information that we hold about you in a structured, commonly used, electronic form so it can be easily transferred.

To object - If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority.

Not to be subject to automated decision-making including profiling

- We do not use any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request

11. Legal Basis

The legal bases that we rely on for processing your personal data are:

It is necessary in connection with the **performance of a contract**:

- Sometimes it is necessary to process your personal data so that we can provide contractual relationships. In this case, the NHP has a contractual relationship with the relevant Local Authority choosing to offer the CLSP to young people leaving care in their area.

It is within our **legitimate interests**:

- Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (if the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights.
- We will also rely on our legitimate interests for the proper administration of CLSP, and to manage our operations (for example, maintaining appropriate records and databases)
- When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

Please see section above for the limited legal basis for when we process sensitive personal data.

12. Changes to our Privacy Notice

We may update this notice from time to time, as regulation or our internal processes change.

We will note and date significant revisions at the start of this policy. If you wish to be contacted directly in the event of significant changes to the Privacy Notice, please send your contact details and request to careleaversupport@thehouseproject.org

If you have any question, comment or suggestions about how we look after your personal data, please contact us by writing to careleaversupport@thehouseproject.org or Data Protection, NHP, Couzens Building CO3A, Crewe Green Road, Crewe, CW1 5DU.