

# Privacy Notice



This notice explains what personal data (information) we hold about you, as well as how we collect, use, and may share information about you. We are required to give you this information under data protection legislation.

## Who we are

Imago collects, uses and is responsible for certain personal information about you. In collecting and using this data, Imago is subject to legislation about how this is done and safeguards that must be put in place to protect it. The legislation governing this collection and usage is the UK General Data Protection Regulations 2018 (UK GDPR) and the Data Protection Act 2018.

Imago are responsible as 'Controller' and 'Processor' of that personal information for the purposes of those laws.

Imago Services and Projects work with you to promote your health and wellbeing, designing support together that both suit you and meet your needs.

## Reasons we can collect and use your personal information

Under the Data Protection Act 2018 and GDPR we collect your personal data, we do so on the following legal basis:

Lawful Basis of Processing Personal & Special Category Data	
Personal Data	
Article 6 (1)(a) Consent	the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
Article 6 (1) (b) Contract	processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
Article 6 (1) (c) Legal Obligation	processing is necessary for compliance with a legal obligation to which the controller is subject

<b>Personal Data (continued)</b>	
Article 6 (1)(e) Public Task	the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

<b>Special Categories of Data</b>	
Article 9 (2) (a) Explicit Consent	the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
Article 9 (2)(h)	the processing is necessary in the provision of health or social care systems

## Information collected by us

Whilst working with you/your family we may collect the following personal information through various methods. This could be from you directly, your parent/legal guardian, and/or with your consent through another agency referring on to us.

The data we collect from you may vary depending on the Service and support offered.

## Personal data

- personal information e.g., your name, address, telephone number, date of birth
- contact details for members of your family and support network (we recommend that if you provide us with someone's contact details that they are informed and consent).
- NHS numbers
- information about your finances, e.g., bank details, income, benefits
- photographs, e.g., to help apply for a bus pass, ID card, Care Plan etc.
- consent agreements e.g., consent to storing data, sharing data with organisations referred to etc.

## Special categories of personal data

- information about your racial or ethnic origin, religious or philosophical beliefs and your sexual orientation
- information about health conditions or disabilities that may apply to you

## Collecting and sharing your personal information

In the course of working with you, we may collect information from, or share it with, some of the following third parties (non-exhaustive list):

- Family members and carers
- Adult Safeguarding Boards
- Children Safeguarding Boards
- Adult and Children's Social Services
- Legal representatives, such as solicitors
- NHS providers, such as GPs and Hospitals
- Other professionals
- Department for Work and Pensions (DWP)
- External providers, such as voluntary and statutory organisations
- Schools

**This data is shared with your consent** to enable us to personalise your support/the service you receive and ensure that you experience the best support possible.

We will share personal information with law enforcement or other authorities if required by applicable law.

*At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review all of the confidential patient information we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose. You can find out more information at [www.nhs.uk/your-nhs-data-matters](https://www.nhs.uk/your-nhs-data-matters)*

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- to create a secure and comprehensive record of the work that we do with and for you,
- fully understand your needs,
- work with you or your representative to create a Care, Action, or Support Plan,
- promote your health and wellbeing in partnership where applicable with NHS Services
- arrange short/long term care solutions,
- liaise with agencies, companies, and charities on your behalf,
- keep you safe from harm,
- process complaints and compliments regarding the service provision,
- request and arrange installation of specialist equipment for you,
- evaluate the service that we are providing,
- provide anonymised statistical reports output by our computer systems,

This sharing of information facilitates a partnership approach with relevant agencies, to provide you with the best possible care and support.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

All personal data is stored on encrypted systems, with unique identification numbers.

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

## **How long your personal data will be kept**

We retain your records throughout your support with Imago, and as long as necessary to fulfil contract reporting requirements.

Children and Young People's records are kept on Imago's encrypted secure database until the child reaches the age of 25. There are certain exemptions where we will have a legal requirement to store data for longer.

## **Your rights**

Under GDPR you have rights which you can exercise free of charge which allow you to:

- know what we are doing with your information and why we are doing it
- ask to see what information we hold about you (subject access request)
- ask us to correct any mistakes in the information we hold about you
- object to direct marketing
- make a complaint to the Information Commissioner's Office

### **You may also be entitled to:**

- ask us to delete information we hold about you
- have your information transferred electronically to yourself or to another organisation
- object to decisions being made that significantly affect you
- object to how we are using your information
- stop us using your information in certain ways

Please note, your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under GDPR.

## Contact

You can contact our Data Protection Team, at [dataprotection@imago.community](mailto:dataprotection@imago.community) or write to:

Data Protection Officer, Imago Community, John Spare House, 17-19 Monson Road, Tunbridge Wells, Kent, TN1 1LS.

GDPR also gives you the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted on **03031 231 113**.