

## **Midstream (West Lancs) Ltd**

### **Privacy Statement**

Midstream (West Lancs) Ltd is registered with the Information Commissioners Office (ICO) Register of Data Controllers Registration Ref: Z5443016

As a service provider Midstream (West Lancs) Ltd collects and uses personal data and information about our service users to;

- enable us to provide health and social care services that meets the needs of our service users; and to
- safeguard, protect and promote the welfare of our service users.

As an employer we also collect and process personal data about our own staff & volunteers (and people applying to work for us) so that;

- we can manage our employees and volunteers (for example, by ensuring that we employ suitable care/teaching staff) ; and so that
- we can meet our legal and contractual responsibilities as an employer.

Midstream (West Lancs) Ltd does not appoint a Data Protection Officer (DPO) as it is not a public authority; and it does not engage in large scale, regular and systematic monitoring of individuals; and we do not process special categories of data or data relating to criminal convictions & offences on a large scale. We are a small organisation (less than 250 employees). We only share personal data with other organisations when it is lawful to do so. We do not sub contract our services to other organisations. We will always make sure that all personal information is protected and treated securely. Any information that we hold, or details supplied to us, will be held and used in accordance with the data protection law – the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## **Midstream (West Lancs) Ltd**

### **Privacy Policy**

#### **Type/classes of information processed about Service Users**

The type and classes of information we collect and process about service users may include :

- Personal details (such as name, address, date of birth, and contact details)
- Family details (such as parents/guardians/next of kin/carers and emergency contact details)
- Lifestyle & social circumstances
- Financial details (such as how your place at Midstream is funded, details of paying agents, direct payments etc)
- Education and employment details (such as the schools / colleges you attended or any vocational training or work experience you have done or are taking part in along with records of assessment & attainment e.g. enrolments with examining bodies, portfolios of evidence of achievement and progression)
- Attendance (such as sessions attended, number of absences & reasons for absence)
- Transportation details

We also process special category information in order to keep yourself and others at Midstream safe that may include:

- Information concerning health, disability, learning difficulties and special needs (such as allergies, medication and dietary requirements along with other information about your support needs). We also require up to date Education, Health & Care Plans; and other Care Plans (for example epilepsy management plans) written by health/care professionals, along with your GP contact details
- Safeguarding information (such as court orders and professional involvement). We will also ask you to disclose any criminal record and ask you to disclose if you have been a victim of abuse
- Behavioural information (such as incident reports, management strategies, triggers, sanctions, exclusions, and reward strategies for good behaviour)
- sexual orientation
- Racial or ethnic origin
- Religious or other beliefs of a similar nature

## **How we collect service user information**

We collect service user information during Midstream's admission process from the data subject (such as application form, safeguarding questionnaire(s), Education/Health & Care Plan); and from parent/guardian/carer/family/health & social care professionals/school transition workers or other professionals, associates or representatives of the person to whom that information relates.

## **Why we collect and use service user information**

- To meet the care/support needs of each individual service user
- To keep service users safe
- To support service users learning & development needs or aspirations
- To monitor, measure service user attainment progress
- To provide appropriate pastoral care
- To assess the quality of our services

## **Who uses this information**

- Teaching / Learning & Care Support Staff at Midstream who work with and support our service users
- Senior managers and administrative support staff at Midstream

## **Who the information may be shared with**

We sometimes need to share the personal information we process not only with the parent/guardian/carer of the data subject but also with other organisations. We usually obtain consent to do so from the data subject or their parent/guardian/carer. In some circumstances consent may not be needed, for example where; GDPR Article 9(2)(h) processing is necessary for the purposes of...the provision of health or social care or treatment or the management of health or social care systems and services on the basis of UK law; or to safeguard, protect & promote the welfare of the data subject or other service users.

Where necessary or required we share information with:

- Family, associates or representatives of service users
- Local & Central Government
- Healthcare, social & welfare organisations
- Educators & examining bodies
- Financial organisations
- Current, past & prospective employers

We routinely share service information with :

- Your own local Authority (such as social workers)
- Midstream's own Local Authority i.e. Lancashire County Council
- Your parent/guardian/main carers
- Health/Social Care professionals

We only share personal data with other organisations where it is lawful to do so.

We do not use personal data for direct marketing (promoting or selling goods, services etc.) or share information with anyone else who will use it for direct marketing, unless you have specifically consented to this.

### **Retention and disposal of service users personal data**

We retain data for as long as it is necessary for us to do so. Personal files are retained for a period of 6 months after the date a service users place at Midstream is terminated. Training portfolios are retained for a period of 12 months. Attendance registers are retained for a period of six years. At the end of its retention period personal data is securely destroyed. For administrative and statistical purposes a register of service user start and termination dates is retained. For accounting purposes invoices raised by Midstream for the provision of day care/training & support to service users are retained for a period of six years.

### **Requesting access to your personal data**

Under data protection legislation, service users have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your training/progress records please write to Anita Cooke, Chief Executive, Midstream (West Lancs) Ltd, 2 Penrose Place, Skelmersdale, Lancashire, WN8 9PR, marking the envelope 'Confidential'.

You also have the right to :

- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- A right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by writing to Anita Cooke Chief Executive, Midstream (West Lancs) Ltd, 2 Penrose Place, Skelmersdale, Lancashire, WN8 9PR, marking the envelope 'Confidential'.