

Lincolnshire Action Trust Privacy Notice

Lincolnshire Action Trust (LAT) is required to keep and process certain information about individuals in accordance with its legal obligations under the General Data Protection Regulation (GDPR).

Lincolnshire Action Trust is the data controller for the data of its clients, volunteers and staff. It is responsible for determining how data is collected, held and dispensed. On occasion, it will sometimes be necessary for LAT, as data controller, to outsource some activities to other companies or organisations (data processors). LAT will, as far as possible, ensure that these organisations are compliant with GDPR.

This policy applies to all processing of personal data in electronic form or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

Your privacy is protected by law. Data protection law says we are allowed to use personal information only if one or more of the following reasons applies:

- To fulfil a contract we have with you
- When it is our legal duty
- When you consent to it being used
- When it is a legitimate interest to do so, unless this would cause harm to your rights, freedoms or legitimate interests

We may use your personal information to:

- Deliver services and projects
- Obey laws and regulations
- Respond to complaints and seek to resolve them

Registration

Lincolnshire Action Trust is registered with the Office of the Data Commissioner and this registration will be maintained annually.

Principles

LAT will, so far as is reasonably practicable, comply with the GDPR Principles regarding the rights of the individual. Information will be:

- Processed fairly and lawfully and in a transparent manner
- Collected for specified, explicit and legitimate purposes, and not be further processed for other purposes incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purpose/s for which they are processed
- Accurate, and where necessary, kept up to date
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which they are processed
- Processed in accordance with the rights of the data subject
- Processed in a way that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Not transferred to a country outside the European Economic Area

How do we collect information

We obtain information from our Service Users when they access services that we deliver.

We obtain information about individuals connected directly or indirectly with the Criminal Justice System, via secure electronic means, verbally or via hard copy.

Partners that we work with will also collect information on our behalf. This may be via secure electronic means, verbally or via hard copy format.

How do we use the information we hold

- We are required to pass on some service user information to HMPPS and other criminal justice agencies who monitor how we carry out our services
- We may share information in the interest of prevention and detection of crime
- We have to share information in order to safeguard you or others
- We have to share some information with Courts, Prisons, Police, Probation, Youth Offending Service, Children's Services, Adult Social Care
- We may share some information with other organisations who help us to deliver support services to Service Users
- For our internal record keeping requirements
- To improve our services

We will not share any of the information with third parties except for the purpose for which consent is given or for a legitimate business or legal purpose.

All third parties engaged to process personal data on behalf of LAT or with whom we share personal data are aware of and comply with GDPR.

LAT have defined retention periods for the information we hold. These are reviewed on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract we hold.

Data Security

LAT employs significant security measures to protect personal information from access by unauthorised persons and against unlawful access or processing, accidental loss, destruction or damage.

Our desktop workstations, laptops and tablets are kept password protected at all times and locked when not in use. Portable USB drives have restricted use and are not used to transport personal data. All hard copy data is kept in secure cabinets within locked offices when not in use. Hard copy data is retained, only where necessary and in accordance with guidelines and contractual obligations, in locked cabinets, and destroyed by shredding.

Special Categories of Personal Data

Previously known as sensitive personal data, this is data about an individual which is more sensitive, so requires more protection. The special categories include information relating to an individual about:

- Race or ethnic origin
- Politics
- Religious beliefs
- Trade Union membership

- Physical or mental health
- Sexual orientation
- Commission or alleged commission of any offence, including and proceeding, disposal or sentence relating to this

In cases where LAT processes special categories of personal data, we will obtain the individuals explicit consent, unless we are required to process this by law (e.g. in relation to safeguarding, commission of an offence).

Under 16's

LAT is concerned to protect the privacy of children aged 16 and under. LAT will gain consent from a parent or guardian before processing personal information related to anyone under 16, unless we are providing a preventative or counselling service directly to the child and obtaining such consent would jeopardise effective delivery of this service for the individual child.

How to get a copy of the information we hold on you

You can access your personal information we hold by email or by writing to us at our registered office.

Letting us know if your personal information is incorrect

We will take all reasonable steps to ensure that the details we hold for you are accurate and to correct it as necessary on receipt on our request to do so.

You have the write to question any information we have about you that you think is wrong or incomplete. Please contact us at our registered office.

If you decide you would like us to stop using your personal information

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no legal or contractual requirement for us to keep it.

How to withdraw your consent

You can withdraw your consent at any time by contacting us at our registered office.

How to complain

Please let us know if you are unhappy with how we have used your personal information by contacting us at:

The Data Protection Officer
Lincolnshire Action Trust
Lincoln
37-39 Newland
Lincoln
LN1 1YA
Or by email: InformationSecurity@LATcharity.org.uk

If you are still not happy with how LAT is dealing with your information, you have the right to complain to the Information Commissioner's Office: <https://ico.org.uk/concerns/>

This Policy is kept under regular review and was last updated in May 2018 in line with GDPR requirements.