



## Privacy Notice - Service Users

### Introduction

As part of the services we offer, we are required to process personal data about our service users and, in some instances, the carers or relatives of our service users.

“Processing” can mean collecting, recording, organising, storing, sharing or destroying data.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

We will do our very best to look after your personal information. We want everyone who comes to us for support to feel confident about how any personal information they give will be handled, used and secured.

You can be confident that:

- We will never release your information to organisations outside Open Door for their marketing purposes;
- We only use personal information in the ways we need to and that is expected of us;
- We will be especially careful and sensitive when engaging with vulnerable people or those we have reason to believe might be vulnerable;
- We take all reasonable care to safeguard your personal information through security policies and secure business processes;
- We will always provide easy ways for you to contact us. Our Data Protection Officer is happy to answer any queries you may have.

### Your rights

Under data protection law, you have rights including:



- **Your right of access** - You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service;
- **Your right to rectification** - You have the right to ask us to correct any data we have which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request;
- **Your right to erasure** - You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. We retain our data in line with the Information Governance Alliance's guidelines. Please note that the right of erasure may not apply to clinical records.
- **Your right to restriction of processing** - You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.
- **Your right to object to processing** - If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.

If you make any of the above requests, we may ask you to provide proof of identity. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month. You are not required to pay any charge for exercising your rights.

Please contact us at [dataprotection@opendooronline.org](mailto:dataprotection@opendooronline.org) if you wish to make a request.

If you would like to complain about how we have dealt with your request, please contact: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk/global/contact-us/> )



## Processing of Service User Data

### 1. How we collect personal information about you

We may collect personal information from you when you interact with Open Door. There are many occasions when this could happen, for example: if you enquire about our activities, refer/make a referral to us, during treatment, if you make a donation to us, if you choose to provide us with optional feedback, or otherwise provide us with personal information. We may collect this information over the phone, via our website, through the post, or in person.

### 2. What information do we collect?

So that we can provide a safe and professional service, we need to keep certain records about you. We may process the following types of data under Article 6.1(c) of the General Data Protection Regulation:

- Your basic details and contact information e.g. your name, address, date of birth, postal address, telephone number;

We also collect the following data, which is classified as “special category”, under Article 9.2(h) of the General Data Protection Regulation:

- Health and social care data about you, which might include both your physical and mental health data;
- We may process data about your race, ethnicity, sexual orientation, disability, or religion/spiritual/philosophical beliefs. Where this data is collected via survey rather than during the course of treatment, it will not be processed onwards unless in de-identified form. This means in a format where your identity and privacy are protected.



### **3. How do we use personal information?**

We may use your personal information to:

- Provide you with the important advice and support you've asked us for;
- Provide or administer activities relating to all our services: updating you with important administrative messages, to help us identify you when you contact us, and help us to properly maintain our records;
- Improve your experience with us. We may use your information to enhance the service that our staff provide and improve our information and communication.

### **A special note about the Special Category Information we hold**

We only use this information for the purposes of dealing with your enquiry, treatment provision, training, and quality monitoring or evaluating the services we provide. We will not pass on your details to anyone else without your knowledge except in exceptional circumstances.

If you provide us with any such information by telephone, email or by other means, we will treat the information with extra care and always in accordance with this Privacy Policy.

Your personal information and details of the enquiries received are stored on a secure database. They will be kept for the duration of your treatment. For adult service users, data will be kept for 8 years after the end of treatment; for under 18s, records will be kept until the age of 25 (or until the age of 26 if the young person is aged 17 when treatment ends). If this information is kept for longer, in exceptional circumstances, we will inform you of this.

### **4. Who sees your personal information?**

The personal information we collect about you will be used by our staff and approved volunteers in Open Door so that they can support you. In exceptional circumstances (not routinely unless with consent) and to the best of our ability with the knowledge of the individual/s concerned, we may share information with your GP/health service/parent/guardian.



We will never sell or share your personal information with organisations so that they can contact you for any marketing activities.

We may share data with the NHS or other healthcare partners but this will always be in a de-identified format. De-identified clinical care data may be re-used, including through linkage with other data sources, for the purpose of data analysis and reporting.

## **5. Your Information Security**

We take the security of your personal information extremely seriously.

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, or loss.

We only keep your personal information for as long as is reasonable and necessary, which may be to fulfil statutory obligations. Paper records which are due for deletion will be destroyed using a company which provides a certificate of secure destruction.

## **6. Your communication with our Open Door team**

Your communication with our team (including by telephone or email) may be monitored for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

## **7. How to access your personal information**

Under the Data Protection Act 2018, you have the right to see all electronic and paper information held about you, free of charge. If you would like to access your records, you will need to complete a Subject Access Request (SAR) Form and return it to the Data Protection Officer. We will respond to you within 1 month of us receiving your request.



To request a Subject Access Request Form you can contact us by post to Data Protection Officer, Open Door, 12 Middle Lane, London, N8 8PL or by email to [dataprotection@opendooronline.org](mailto:dataprotection@opendooronline.org). This form is also available on our website.

## 8. Changes to our Privacy Policy

Our Privacy Policy is reviewed regularly to ensure that it reflects how we use your information. Any changes will be reflected in the updated privacy policy on our website.

For further information about our privacy practices, please contact our Data Protection Officer by:

Post: Data Protection Officer, Open Door, 12 Middle Lane, London, N8 8PL

Email: [dataprotection@opendooronline.org](mailto:dataprotection@opendooronline.org)

Phone: 020 8348 5947

**Note:** Occasionally, as part of our work providing high-quality care and support, it may be necessary to hold information on relatives, or carers. Under these circumstances, the same principles will apply as above.

## Our Website

In order to provide you with the best experience while using our website, we process some data about you.

We may gather general information about the use of our websites, such as which pages users visit more often and which services, events, or facilities are of most interest. We may use this information to personalise the way our websites are presented when users visit them, to make improvements to our websites and to ensure we provide the best service for users. We will never collect identifiable information about the users of our websites.