Central Carers Association
Privacy Notice for Carers

Introduction

Falkirk & Clackmannanshire Carers Centre is committed to protecting all personal data relating to people who use or ask to use our services. This policy explains when and why we collect personal information.

Personal Data

Personal data is information about an individual who can be identified from that data, for example, their name, address, or phone number. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

Some types of personal data are regarded as 'special categories' of personal data. This includes information about a person's race, ethnic origin, politics, religion, health, or sexual orientation.

Who we are

Falkirk & Clackmannanshire Carers Centre provides information and support to carers in Falkirk district and Clackmannanshire. The Carers Centre is managed by a local voluntary organisation, Central Carers Association (CCA), which is registered in Scotland as a company limited by guarantee with charitable status. CCA's Charity Number is SC023658 and its Company Number is SC184443.

For the purposes of processing personal data, Central Carers Association is the 'data controller' which means that it decides how personal data is processed and for what purpose.

What data we collect

In carrying out our work, we collect and process personal information about people who contact our service. This includes:

- Individual's contact details such as name, address, telephone number
- Some 'special categories' information where it is provided as part of a request for support, for example, information about an individual's health or ethnicity
- Notes on what carers have told us about their caring role, their life outside caring, the support they are seeking and the outcomes they wish to achieve
- Dates and times of contact, such as meetings, phone calls, attendance at groups and sessions facilitated by the Carers Centre
- Information about other people that has been provided by the carer, for example, the name, date of birth, health condition and gender of the person they are caring for

Why we collect this data

- To allow us to deliver a service to the carer at the carer's request
- To allow us to get in touch with the carer in relation to the support that has been requested
- To ensure that the support provided is tailored to the needs and circumstances of the carer

- To add carers to the Carers Centre's mailing lists to receive regular information from the Carers Centre, including our twice-yearly newsletter, **where the carer has requested this**
- To carry out administration in relation to membership of Central Carers Association
- To allow us to produce statistical information about our activities to our funders and auditors (This information is anonymous, and no individuals can be identified).

Lawful basis for collecting this data

The GDPR requires that we have a lawful basis for collecting this information. One lawful basis for collecting personal data is where it is necessary for the organisation's **'legitimate interests'** to process this information. In the course of providing information and support to carers who contact the Carers Centre, or who are referred to the Centre by a third party, it is necessary to process personal data provided by the carer or the referrer on order to deliver this service.

For some uses of personal data, we seek '**consent'** from the carer. Carers who contact the Carers Centre will be invited to complete a **Carer Registration Form** which asks the carer, **if they wish to do so**, to give **consent** for us to:

- Add their details to the Carers Centre mailing lists to receive future information for carers
- Include anonymised information about their caring role and support received in case studies to promote the work of the Carers Centre and raise awareness about carer issues
- Share their details with other relevant agencies that may be approached on their behalf for information, advice or services
- Allow photographs to be used to promote the work of the Carers Centre

Sharing Carer Information

In some case, it may be in the carer's interests for us to approach other agencies on their behalf for information, advice or services. If the Carers Centre does this, it will only be with the carer's knowledge and consent.

If a carer shares any personal information with the Carers Centre, it will be treated as strictly confidential, kept securely and not shared with other organisations without the carer's consent **unless under exceptional circumstances**, which includes information relating to any risk of serious harm to the carer or another person (child or adult), or a criminal offence. Further information is contained in our Confidentiality Policy and Procedures, Child Protection Policy and Procedures and Adult Support and Protection Policy and Procedures.

In April 2018, the Carers (Scotland) Act came into force. This Act introduces a number of rights for carers but also places a legal duty on all local authorities to provide data to the Scottish Government for a biennial **Carers Census**. In carrying out work to support carers on behalf of the local authority, including in relation to Adult Carer Support Plans and Young Carer Statements, the Carers Centre is required to provide data for the Carers Census directly to the Scottish Government so that it can be included in the statistics that are produced.
This is for statistical and research purposes only, to monitor the impact of the Act and plan and improve future services, and statisticians/researchers will not be able to identify individual carers from the data they will use.

How long data is kept

Carers will remain on the active Carers Centre **mailing list** until:

- They inform us that they no longer wish to remain on the mailing list (either verbally, by email, by telephone, or by returning the reply slip enclosed with each newsletter)
- Over 2 years has passed since they notified us that their caring role has ended, and they are currently not in a caring role
- Mail is returned to the Centre notifying that the carer is no longer at the given address
- Following a periodic review of the mailing list (normally every 3-5 years), carers who have had no recent contact have been approached and have indicated they no longer wish to remain on the mailing list or have not responded to requests to indicate that they wish to remain on the mailing list.

Records of carers who have used our service will be retained on the Carers Centre database for 5 years after their last contact with the Centre to ensure that we have relevant information for a reasonable period of time should the carer require further services or support or wish to speak to us about past support received.

After 5 years, carers' data will be anonymised – any information that would allow the carer to be identified will be removed. Anonymous information about the contact with our service will be retained to allow us to provide historical statistics about our service.

Any paper records for individual carers who have had no contact with the Centre in the previous 5 years will be confidentially and securely destroyed.

Individual's Rights

Unless subject to an exemption under the GDPR, people who use our services have the following rights with respect to their personal data:

- The right to request a copy of the personal data that the Carers Centre holds about them
- The right to request that the Carers Centre corrects any personal data if it is found to be inaccurate or out of date
- The right to request that their personal data is erased where it is no longer necessary for the Carers Centre to retain it
- Where applicable, the right to request that the Carers Centre provides them with their personal data and, where possible, transmits that data directly to another data controller in electronic format
- The right, where there is a dispute in relation to the accuracy or processing of their personal data, to request a restriction is placed on further processing;
- Where applicable, the right to object to the processing of personal data
- The right to lodge a complaint with the Information Commissioners Office

For further information, or if you wish to exercise any of these rights, please contact the Centre Manager in writing at:

Falkirk & Clackmannanshire Carers Centre
Bank Chambers
1a Bank Street
FALKIRK
FK1 1NB

Access to Data

As stated above, individuals can request a copy of the personal data that the Centre holds about them. Individuals can exercise this right by making a **'subject access request'** to the Carers Centre. Further information about making a subject access request is contained in the organisation's ***Subject Access Request Policy***, which is available from the Carers Centre. We would respond to a subject access request within one month or notify the individual if further time is required and why.

Storing Personal Data

Information is stored by the Carers Centre on our computer systems and in secure online services. To protect information in the event of a problem with the Centre's systems, the Centre also uses secure online back-up services. For some of our services, we may also store information in paper files in secured cabinets at the Carers Centre's premises.
Individuals have an option to contact us through our website. We cannot guarantee that information sent through the website is completely secure, however, we will do our best to protect personal data. Further information is contained in the ***Website Privacy Notice*** on the Carers Centre website.

Data Breaches

Any data breaches will be recorded on our ***Data Breach Register***. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to a breach. More information on breach notification is available in our ***Data Breach Notification Policy*** which is available from the Carers Centre.