

Privacy Statement

1 Overview

- 1.1 Catalyst is committed to protecting the privacy and security of personal data/information and complying with our obligations under the **Data Protection Act 2018** (the '2018 Act') and the **General Data Protection Regulation** ('GDPR') in respect of data privacy and security. Catalyst takes the security and privacy of data seriously. We need to gather and use information or 'data' as part of our business and to manage relationships with clients, staff, volunteers and partners.

Catalyst is a registered charity (No. 1075892) and registered company (No. 3689561) at 14 Jenner Road, Guildford GU1 3PL

Catalyst is registered with the Information Commissioner's Office : ZA182922

2 Data Protection Principles

- 2.1 Personal data must be processed in accordance with six '**Data Protection Principles**.' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

3 How we define personal data

- 3.1 '**Personal data**' means information which relates to a living person who can be **identified** from that data (a '**data subject**') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.
- 3.2 This policy applies to all personal data whether it is stored electronically, on paper or on other materials.
- 3.3 This personal data might be provided to us by clients, staff, volunteers or someone else (such as a doctor or other support organisation), or it could be created by us.

3.4 We will collect and use the following types of personal data:

3.5 **For staff:**

- recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;
- your contact details and date of birth;
- the contact details for your emergency contacts;
- your gender;
- disabilities or sensory impairments;
- your marital status and family details;
- information about your contract of employment (or services) including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement;
- your bank details and information in relation to your tax status including your national insurance number;
- your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us;
- information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings);
- information relating to your performance and behaviour at work;
- training records;
- electronic information in relation to your use of IT systems/swipe cards/telephone systems;
- your images (whether captured on CCTV, by photograph or video);
- any other category of personal data which we may notify you of from time to time.

3.6 **For volunteers:**

- recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;
- your contact details and date of birth;
- the contact details for your emergency contacts;
- your gender;
- disabilities or sensory impairments;
- your marital status and family details;
- your bank details and information in relation to your tax status including your national insurance number;
- your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us;
- information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings);
- information relating to your performance and behaviour at work;
- training records;

- electronic information in relation to your use of IT systems/swipe cards/telephone systems;
- your images (whether captured on CCTV, by photograph or video);
- any other category of personal data which we may notify you of from time to time

3.7 For clients:

- Referral information over the phone and at first assessment
- Your name
- Your contact details and date of birth
- Your gender
- The contact details for emergency contact
- GP name
- Other organisations involved in your support
- Records of attendance at appointments or groups
- Any other category of personal data which we may notify you of from time to time

4 How we define special categories of personal data

4.1 **'Special categories of personal data'** are types of personal data consisting of information as to:

- your racial or ethnic origin;
- your religious or philosophical beliefs;
- your Trade Union membership;
- your health;
- your sex and sexual orientation; and
- any criminal convictions and offences.

Where relevant we may hold and use any of these special categories of personal data in accordance with the law.

5 How we define processing

5.1 **'Processing'** means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

6 How will we process personal data?

- 6.1 Catalyst will process personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.
- 6.2 We will use your personal data for:
- performing the delivery of our work supporting clients
 - co-ordinating volunteer work
 - contracts of employment (or services)
 - complying with any legal obligation; or
 - if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights in section 12 below.

We can process personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

7 Examples of when we might process personal data

- 7.1 We have to process personal data in various situations during referral, assessment, treatment and support, recruitment, employment (or engagement) and even following termination of your employment (or engagement).
- 7.2 We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data, then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting Catalyst.
- 7.3 We do not need your consent to process special categories of your personal data when we are processing it for the following purposes, which we may do:
- where it is necessary for carrying out rights and obligations under employment law;
 - where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
 - where you have made the data public;
 - where processing is necessary for the establishment, exercise or defence of legal claims; and
 - where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity.

- 7.4 We do not take automated decisions about you using your personal data or use profiling in relation to you.

8 Sharing personal data

- 8.1 Sometimes we might share your personal data with those we hold contracts with, i.e. Surrey County Council, or with specified other support organisations or our contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.
- 8.2 We provide anonymised data to commissioners and funders to provide evidence that services run effectively and to assist in health research and planning
- 8.3 We require them to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.
- 8.4 We do not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

9 Retention of data

- 9.1 We will only keep personal data for as long as is necessary to fulfil the purposes we hold it for, in order to fulfil reporting, accounting or legal purposes. The length of time may vary depending on the reasons for which we are holding it.

10 Data breaches

- a. We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) we have policies and procedures in place in accordance with GDPR. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we will notify the Information Commissioner's Office within 72 hours.

11 Subject access requests

- a. Data subjects can make a '**subject access request**' ('SAR') to find out the information we hold about them. This request must be made in writing.
- b. If you would like to make a SAR in relation to your own personal data, you should make this in writing to Catalyst. We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

- c. There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

12 Your data subject rights

- a. You have the right to information about what personal data we process, how and on what basis as set out in this policy.
- b. You have the right to access your own personal data by way of a subject access request (see above).
- c. You can correct any inaccuracies in your personal data.
- d. You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected.
- e. While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made.
- f. You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
- g. You have the right to object if we process your personal data for the purposes of direct marketing.
- h. You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
- i. You have the right to be notified of a data security breach concerning your personal data.
- j. In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later.
- k. You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.

13 Changes to this privacy notice

We reserve the right to update this privacy notice at any time and will publicise when we make any substantial updates.