



Croydon Youth Information & Counselling Service Limited

Privacy Statement

Croydon Drop In
Tel: 020 8680 0404
Company Limited by Guarantee Registration Number 3092355
Registered Charity Number 1049307
Registered Office, 132 Church Street, Croydon, CR0 1RF

Through CDI's Policy Review System, all policies are reviewed annually from the date of approval

CDI Privacy Statement

Croydon Drop In (CDI) is a registered Charity, supporting young people and families providing Information, Advocacy, Counselling, Outreach and Health Support in Communities & Schools.

CDI collects and uses certain types of personal information about the following categories of individuals that engage with CDI:

- Employees and prospective employees through recruitment
- Volunteers and prospective volunteers
- Trustees
- Children, young people and other individuals accessing CDI for support
- Parents/carers of service users
- Donors
- Local stakeholders, supporters and friends, and any other individuals who come into contact with the Charity.

We collect the following information

Personal data is defined as any information that can be used to identify an individual.

- Basic personal data includes, name, date of birth, email address, postal address and telephone numbers.
- Special categories of data is more sensitive personal information such as race, ethnic background, religious beliefs, health, sex life or orientation.
- Presenting concerns of individuals accessing CDI services for support.
- Financial details (bank account number, UK tax payer information) of CDI employees and individuals making donations to the Charity.
- Technical data which may identify device IP address or web browser, via engagement with CDI's website and social media platforms.
- The use of CCTV outside CDI's office for safety and security purposes.

How we get the information

Most of the personal information CDI processes is provided to us directly by you for the following reasons:

- You have contacted one of CDI's services and are accessing CDI for support.
- You have engaged with CDI's recruitment process, whether by sending your CV and/or completing a job application form.
- You have visited CDI's website, social media platforms or emailed CDI.
- You have attended an event hosted by CDI, such as CDI's AGM.
- You have made a donation to CDI.

For individuals accessing CDI services for support we may also receive personal information indirectly, from the following sources:

- Child & Adolescent Mental Health Services (CAMHS) / GPs and other health professionals / education providers / other professionals working alongside you.

Why we have your information

- To help us provide the best service we can to all individuals that are involved with or access CDI services for support. Also, to tell you about other services that might be able to provide you with appropriate support.
- To collate and produce reports that CDI are required to write for service commissioners and funding providers such as CDI Quarterly Service Reports, CDI Annual Reports and funding applications. Personal information such as, gender identity, age, ethnicity, post code (first 3/4 letters/numbers only) and presenting concerns are always presented anonymously in reports. This information is included to ensure the support CDI provides is reaching the community in which we work.
- CDI receives funding from NHS South West London Integrated Care Board and NHS England for some of our service provisions. CDI are therefore required to provide monitoring information about individuals that access our services. This information is processed via NHS Digital; information does not include names but does include date of birth and postcode to ensure data is only accounted for once. Individuals accessing CDI services will always be asked for consent to share information with NHS Digital. It is your right to decline to share your information with NHS Digital if you want to.
- Regular monitoring questionnaires and session notes are used to record how individuals accessing CDI services are feeling to ensure appropriate support is offered.
- Feedback/evaluation forms from individuals accessing CDI services for support are used to provide us with important information on our service provision. We use quotes from these forms in the various reports we are required write. These quotes will only be used where we have your permission to do so and are included anonymously.
- CDI use equal opportunity monitoring forms for recruitment and staff/service user surveys in order to gain information to ensure we are fulfilling our equal opportunities policies.
- To analyse and improve services offered on CDI's website and social media platforms.
- To record and respond to any feedback or comments from any individuals involved with CDI.

The lawful basis for using personal data

Under the General Data Protection Regulation (GDPR), CDI are required by law to have a reason for using any of your personal data.

- **Consent:** This is where CDI have asked for your permission to use your personal data in a specific way. For example, contacting you via email or SMS. You are able to remove your consent at any time. You can do this by contacting the CDI Director, please email gordon@croydondropin.org.uk or write to Croydon Drop In, 132 Church Street, Croydon, CR0 1RF.
- **Contract:** CDI may process your personal data as part of an agreement you have with us. For example, if you are an employee of CDI.

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- **Legal obligation:** CDI may collect or share your personal data where we are required to do so by law. For example, relating to safeguarding.
- **Vital interest:** CDI may use your personal data if there is an immediate risk to your health or safety.
- **Public task:** Some of CDI's activities are undertaken in the public interest. For example in the area of public health.
- **Legitimate interest:** CDI's legitimate interest is to support children, young people and families regarding mental health and wellbeing. This means that the reason we are processing information is because there is a legitimate interest for CDI to do so to ensure we provide the most appropriate support.

Sharing your information:

CDI does not share the information you provide to any other external organisations without your permission. In line with CDI's Confidentiality Policy and CDI's Safeguarding Policy there are however, exceptional circumstances whereby CDI may need to act without your permission including; if we feel someone is at risk to themselves or to others, in an emergency or when ordered to by a court of law. CDI will, wherever possible, keep you informed with any actions taken.

CDI will never sell or share your personal information to any organisations for marketing purposes.

How we store your personal information

CDI take all steps reasonably necessary to make sure that personal data, whether in paper or electronic form, is treated securely. The information you share with CDI is stored on password protected secure databases, secure password protected server and any paper records are held in secure locked filing cabinets.

Your information will only be accessed by authorised personnel, including those who are responsible for supporting you directly, relevant CDI staff members and those responsible for maintenance and security of our digital systems.

CDI only keeps your information as long as reasonable and necessary for the relevant activity. We are legally required to hold some personal data to fulfil statutory obligations. Personal information records are currently stored securely for 7 years from your last contact date with any of CDI's services, in compliance with our Data Protection Policy. After the relevant time all data is sensitively and securely deleted and/or destroyed in the most appropriate way.

Your rights

The Data Protection Act 2018 and UK GDPR provides the following rights for individuals:

- **Access your personal information:** You have the right to request access to a copy of the personal information that CDI holds about you in many circumstances. This is referred to as a 'Subject Access Request'. Please make all requests in writing to the CDI Director at: Croydon Drop In, 132 Church Street, Croydon, CR0 1RF.

CDI will request proof of identity and sufficient information about your interactions with us so that we can locate your personal data. Please note, some of these rights only apply in certain circumstances. Where one of your rights does not apply CDI will communicate the reason to you. If CDI agree that we are obliged to provide personal data to you (or someone else on your behalf where consent is provided), we will provide it to you or them and aim to do so 30 days from when your identity has been confirmed. No administration fee will be charged for considering and/or complying with such request unless the request is deemed to be excessive in nature.

- **Correct your personal information:** You can ask CDI to change or complete any inaccurate or out of date information we hold.
- **Restriction, Objection and Erasure:** You can ask CDI to restrict the personal information we use about you and/or object to the processing of your personal data in some circumstances. You can ask us to delete your personal information where it is no longer necessary for us to use it or have withdrawn consent. This is also known as the 'right to be forgotten'. These rights are not absolute and only apply in certain circumstances.
- **Portability:** You can ask CDI to provide you with some of the personal information held about you in a structured, commonly used and electronic format so it can be easily transferred.
- **No automated decision-making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human involvement. CDI do not currently carry out any automated decision-making.

In accordance with GOV.UK instruction there are some situations when organisations are allowed to withhold information, e.g. if the information is about the prevention, detection or investigation of a crime. An organisation does not have to say why they are withholding information.

Cookies

CDI's website uses cookies to distinguish you from others using our website. This is to help CDI provide a good service on our website and allow us to make improvements. A cookie is a small piece of code that can do various things. For example, ensure the operation of the website is working and monitor performance and analytics to see if links or pages are accessed to ensure visitors to the website can find what they are looking for.

Contact

If you have any concerns about CDI's use of your personal information, you can write to the CDI Director at: Croydon Drop In, 132 Church Street, Croydon, CR0 1RF or email gordon@croydondropin.org.uk

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights <https://www.ico.org.uk> 0303 123 1113 or via post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. We are registered with the Information Commissioner as Croydon Youth Information & Counselling Service Ltd and our registration reference is ZA315283.

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