

Pure Insight Privacy Notice

First Copy Approved by: Sarah Sturme
Chief Executive

Signed:

Date: May 2018

Date	Comment	
March 2018	First Pure Insight Notice, completed in conjunction with Pure Innovations	B Harris

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit. Although we do not use CCTV, some of the buildings we use to provide our services may be monitored by a third party who may own the premises.

The GDPR from 25th May 2018

This legislation will replace current data privacy law, giving more rights to you as an individual and more obligations to organisations holding your personal data.

The GDPR provides the following rights for all individuals, as follows:-

1. The right to be informed
2. The right of access
3. The right of rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Complaints or queries

Pure Innovations tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you want to make a complaint about the way we have processed your personal information, you can contact: - barbara@pure-insight.org.uk

Access to personal information

Pure Insight tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form

To make a request to Pure Insight for any personal information we may hold you need to put the request in writing to the address below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us

How to contact us

If you want to request information about our privacy policy you can email us or write to:

barbara@pure-insight.org.uk

Barbara Harris
Pure Insight
5 Rhino Court
Station View
Hazel Grove
Stockport
SK7 5ER

How we use your information

This privacy notice tells you what to expect when Pure Insight collects personal information. It applies to information we collect about:

- Visitors to our websites
- Complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry
- People who use our services, and their parents and carers, where applicable
- Job applicants and our current and former employees and volunteers

Visitors to our websites

When someone visits info@pure-insight.org.uk we use a third party service, Wix.com, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Wix.com to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by Pure Innovations

We can confirm that Pure Insight do use Cookies on our website. For information on which Cookies are used please email us at info@pure-insight.org.uk

Search engine

Our website search and decision notice search is powered by Wix.com. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either Pure Innovations or any third party.

Security and performance

Pure Insight uses a third party service to help maintain the security and performance of the Pure Innovations website. To deliver this service it processes the IP addresses of visitors to the Pure Insight website.

People who contact us via our website or social media

If you send us a private or direct message via our website or social media the message will be stored by Wix.com (for as long as you are a subscriber). It will not be shared with any other organisations.

People who call us

When you call Pure Insight we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

People who email us

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for six months from closure, (in-line with a ACAS recommendations). It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

People who use Pure Insight services and their parents and carers, where applicable

Pure Insight offers various services. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. In order to provide you with the service you have requested we will need to collect some personal information. This will be held in a secure location and stored and disposed of in line with our data retention policy. We are supported by a third party, OLM Systems Ltd, Eclipse for our case management system and we also use Awareness Software Limited, (ASL), for storing electronic documents securely. Both of these suppliers store data within the UK.

Personal information about you will only be shared with third parties with your consent or if there is a legitimate reason for us to do so.

In summary:-

We will:-

- Design our services in a way that always considers your privacy
- Only collect information we need to support you
- Keep your information safe
- Keep your information updated and let you see it when you ask
- Only share your information with people we need to so we can support you in the right way and keep you safe
- Always ask for your consent, when needed
- Destroy your information, when we are allowed to

Individuals or organisations reporting a breach

Pure Insight is required by law to report any security breaches involving personal data to the Information Commissioners Office, (ICO) and in some cases, to our Contractors. We have a process in place to respond to any breaches reported.

Job applicants, current and former Pure Insight / Pure Innovations employees and volunteers

Pure Innovation's is the data controller for the information you provide during the recruitment process unless otherwise stated. If you have any queries about the process or how we handle your information please contact hr.team@pureinnovations.co.uk

What will we do with the information you provide to us?

All of the information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements, if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary, in line with our Data Retention Policy.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Application stage

If you use our online application system, this will be collected by a data processor on our behalf (please see below).

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

Shortlisting

Our hiring managers shortlist applications for interview. They will be provided with your name and contact details, in order to invite you to interview, if shortlisted. They will not be provided with your equal opportunities information, if you have provided it, unless this is required to make reasonable adjustments during the selection process.

Assessments

We might ask you to participate in a telephone interview, an assessment day, complete tests and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by Pure Innovations.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained by our HR department for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment, or volunteering opportunity we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom, enhanced DBS check, (for the majority of pure positions), and seek assurance as to your trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies
- Proof of your qualifications, where relevant, – you will be asked to attend our office with original documents, we will take copies
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will provide your details to Eurocom Ci in order to process an enhanced Criminal Record check via the Disclosure and Barring Service, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This may result in a referral and sharing of information to our Occupational Health provider. We will inform you that we are doing this.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Details to join the pension scheme
- Emergency contact details – so we know who to contact in case you have an emergency at work
- We will set up your IT account using our third party ICT support, Awareness Software Limited, (ASL).

Post start date

When you commence your employment we may ask for:-

- Driver license, including on-line checks, MOT and appropriate vehicle insurance, (where you are recruited into a position where you are 'driving for work purposes')
- Where identified and appropriate we may refer and share your information to our Occupational Health provider, this will be with your consent

Upon successful completion of probationary period for employees

- Personal details to process your health benefit with a third party, if chosen

Use of data processors

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

SAGE

If you accept a final offer from us, some of your personnel records will be held on SAGE which is an internally used HR and Payroll records system (Via Pure Innovations Ltd).

How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references. For volunteers retain of your records is 6 months from leaving Pure Innovations. This is inline with our Data Retention Policy.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of your application.

Equal opportunities information is retained for 6 months following the closure of your application if you are unsuccessful.

How we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by speaking to your contact within our the team or by emailing info@pure-insight.or.uk

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