

# Pioneering Care Partnership

## Privacy Statement



### Summary

This privacy notice will help you understand how we collect, use and protect your personal information. If you have any queries about this privacy notice or how we process your personal information, please contact our Data Protection Officer: or get in touch with us by one of the other methods set out at the end of this notice.

### Who we are

The organisation responsible for processing your personal information is Pioneering Care Partnership (PCP). Registered charity number 1067888. Company registered in England 3491237. Carers Way, Newton Aycliffe, County Durham, DL5 4SF.

This means that we are a data controller under The United Kingdom General Data Protection Regulation (also known as UK GDPR) and The Data Protection Act 2018.

This privacy notice also covers the services we deliver through Healthwatch Sunderland, Healthwatch County Durham, Healthwatch Stockton-on-Tees and Healthwatch Redcar and Cleveland services.

### What information we collect about you

The personal information you have provided, we have collected from you or we have received about you from third parties may include:

- name, address and address history, date of birth, and gender (and proof of your identity/photo ID)
- contact we have had e.g. appointments/meetings notes about the support received, including any advice and care
- your National Insurance Number
- Bank and debit/credit card details
- contact details, including telephone number and/or email address
- details about your family and dependents (e.g. your marital status and number of children) and anyone authorised to act on your behalf if applicable
- information about your living circumstances (e.g. your employment details, income details and home ownership)
- profile data including your preferences (for example when you are registering for a specific service), feedback and survey responses
- health details and medical history
- information about disabilities or vulnerabilities
- details about your race, ethnicity, religious beliefs, sex life, sexual orientation, gender recognition status
- other personal information required to enable us to provide you with the service or support you have requested
- aggregated data such as statistical or demographic data which does not identify you individually

## How we collect information about you

- when you register for one of our services or a job by completing a registration or application form either manually or online
- when you register to receive information from us
- when you call, write, email, text or meet with us or respond to a survey or enter a competition
- When you book a service, class or room hire using our booking systems (both online and offline)
- When you call PCP we collect calling number identification (CNID) information.
- automated technologies or interactions – when you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal - information from you by using cookies and other similar technologies
- when you contact us on social media
- when you make a complaint or provide feedback
- when you contact our project and centre teams
- when we operate CCTV/sound recording systems for the detection and prevention of crime
- when we take photographs at our events, and in our communities for general publicity use
- when we receive information about you from third parties including local authorities, NHS organisations, the police, statutory agencies, medical services and support organisations, councillors, MPs or other representatives acting on your behalf

## The legal basis of processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

### Specific consent

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text, telephone marketing and providing a service to you. Your specific consent is also used where you have agreed for us to use your personal information in case studies to promote our work and when we collect special category data.

### Performance of a contract

Where we are entering into a contract with you or performing our obligations under it, like when you enter our prize draws, raffles or tombola's, or participating in events, such as organised events for fundraising. It also includes our obligations under commissioner contracts we are awarded to provide a service to you.

### Legal obligation

Where necessary so that we can comply with a legal or regulatory obligation to which we

are subject, for example where we are ordered by a Court or regulatory authority like the Charity Commission or Fundraising Regulator.

### **Vital interests**

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events or services) or a safeguarding issue which requires us to share your information with the emergency services.

### **Legitimate interest**

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Pioneering Care Partnership as a charitable organisation in pursuit of our aims and objectives. For example, to:

- provide a service that you have registered for, expressed an interest in and/or participated in;
- send postal communications which we think will be of interest to you;
- send email communications about, and related to, fundraising events you have signed up for to help you raise important funds for our charitable work
- conduct research to better understand our supporters, clients and to improve the relevance of our fundraising and service delivery;
- understand how people choose/use our services and products;
- determine the effectiveness of our services, promotional campaigns and advertising;
- sharing personal data amongst relevant teams within Pioneering Care Partnership to ensure we communicate with our supporters and clients in the most effective way;
- purchase marketing lists to promote our fundraising activity
- monitor who we deal with to protect the charity against fraud, money laundering and other risks;
- record and monitor interactions for quality and training purposes
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our clients; and
- better understand how people interact with our website.
- retain records and CCTV recordings as evidence in defence of a legal claim.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for your vital interests, or, in some cases, if it is in the public interest for us to do so).

## Why your information is collected

Your information may depend on the relationship you have with Pioneering Care Partnership. We may use your information for a number of different purposes, which may include:

- providing you with the services, products or information you asked for;
- carrying out our obligations under any agreements entered into between you and us;
- to enable us to work with others providing you with support/advice
- keeping a record of your relationship with us;
- administering your donation or support your fundraising, including processing Gift Aid;
- We use this information to help improve our efficiency and effectiveness and to monitor any malicious/threatening calls;
- responding to or fulfil any requests, complaints or queries you make to us;
- conducting analysis and market research to better understand how we can improve our services, products or information;
- analysing the number and type of people who have used our services to demonstrate our impact and apply for funding
- monitoring the interactions we have with our customers, donors and beneficiaries for quality control and compliance purposes to ensure we are delivering the service we and our regulators expect (See 'Monitoring' section below)
- to monitor website-use to identify visitor location, guard against disruptive use, monitor website traffic, personalise information which is presented to you and/or to provide you with targeted advertisements
- dealing with entries into a competition or draw;
- seeking your views or comments on the services we provide;
- notifying you of changes to our services;
- sending you communications which you have requested and that may be of interest to you. These may include information about campaigns, fundraising appeals and activities and promotions of goods and services;
- communicating with you about the fundraising events you have signed-up for to help us raise important funds for our charitable work.
- administering a legacy, where the charity is potentially the beneficiary of a legacy, we will obtain the names and contact details of executors, a copy of the will, and a grant of probate
- checking donations for the purposes of prevention of fraud or other crime;
- processing grant or job applications.

## Who we may share your personal information with

- our contractors and sub-contractors and other organisations acting on our behalf, including social and health care professionals
- we may appoint a research company to carry out research on our customers or communities in order to improve Pioneering Care Partnership, know more about our customers/communities or establish if there are any gaps in what we are doing, on

these occasions if contacted individuals can refuse to participate in the research without prejudice and can opt out of future research by contacting [data@pcp.uk.net](mailto:data@pcp.uk.net)

- doctors, mental health teams
- next of kin, family members
- local authorities
- social services
- the police and other emergency services
- courts
- government agencies and departments and regulatory bodies
- auditors
- commissioners including the NHS mental health data sets
- external ICT providers
- external professional advisors

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We only permit our third-party service providers to process your personal information for specified purposes and in accordance with our instructions. In appropriate circumstances we will implement a data sharing agreement for this purpose.

## **Security of information**

We are committed to ensuring that your information is kept secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and operational procedures to safeguard and secure the information we collect.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## **Vulnerable people**

We are committed to protecting vulnerable supporters, customers and volunteers, and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

## **Processing your information outside of the EEA**

We do not process information outside of the EEA.

## If you choose not to give personal information

We may need to collect certain personal information by law, or to enable us to provide a service to you.

If you choose not to give us this personal information, it may mean that we cannot perform the services you have asked for. In some circumstances, it could mean that we will need to terminate our relationship with you.

We will always tell you at the time we try to collect such personal data, if your refusal to provide that data may impact on our ability to provide services to you.

## How long your personal information is kept

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations, as well as best practice.

Further reasons we may retain personal information include:

- For our auditing purposes
- Evidence in defence of a legal claim
- Ensuring you are suppressed from marketing if you prefer never to hear from us in the future.

We review our retention periods on a regular basis.

If you would like to know more about how long we hold your personal data for – please email us at {insert email}.

## Your rights

Data Subjects have:

1. the right to be informed - e.g. Fair processing/privacy notices
2. the right of access - e.g. subject access requests (SARs)
3. the right to rectification - e.g. have their data corrected
4. the right to erasure – e.g. have their data deleted/removed
5. the right to restrict processing – e.g. stop their data being used
6. the right to data portability – e.g. transfer their data easily
7. the right to object – e.g. challenge what we're doing with their data
8. rights in relation to automated decision making and profiling – e.g. safeguards to make sure we don't make potentially damaging decisions about them without human involvement.

## Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for

older people and the exciting products and services you can buy, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We're committed to putting you in control of your data so you're free to change your marketing communication preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time using:

Email: marketing@pcp.uk.net, or  
Telephone: 01325 321234, or  
Post: Pioneering Care Partnership, Pioneering Care Centre, Carer's Way,  
Newton Aycliffe, DL5 4SF

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative or services purposes like where we are providing you with a service, processing a donation or thanking you for your participation in an event.

## **National Data Opt Out**

The national data opt-out gives everyone the ability to stop health and social care organisations from sharing their confidential information for research and planning purposes, with some exceptions such as where there is a legal mandate/direction or an overriding public interest for example to help manage the covid-19 pandemic.

As a user of our services you can opt out of your data being used for other purposes. If you wish to opt out of PCP sharing your confidential information for research and planning purposes, please email [data@pcp.uk.net](mailto:data@pcp.uk.net)

## **Website usage and cookies**

Please see website usage and cookies statement

## **How to complain**

PCP aims 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. If you want to make a complaint about the way, we have processed your personal information you can do so using our complaint procedure.

[Click here](#) for PCP complaints procedure.

If you feel that we have not met our responsibilities under data protection legislation, you have a right to request an independent assessment from the Information Commissioner's Office (ICO). You can find details on their website at [www.ico.org.uk](http://www.ico.org.uk)

## Changes to the privacy statement

We keep this privacy statement up to date. It was last updated January 2025.

## How to contact us

For data protection queries or to request an individual right please contact us using the information below:

Data Protection Officer  
Pioneering Care Partnership  
Carer's Way  
Newton Aycliffe

Tel: 01325 321234

Email: [data@pcp.uk.net](mailto:data@pcp.uk.net)

## Monitoring and Review

This procedure will be reviewed by the Operations Manager on a regular basis to ensure that it remains compliant. A full formal review will also take place every 3 years by Senior Management Team as part of the Review Cycle.

**January 2025**

## Document Tracking

Action	Date(s)
Draft to SLT:	10 July 2024
Date Approved :	22 January 2025
Interim Review:	27 August 2025
Approved Procedure uploaded and circulated:	22 January 2025
Main Review Date:	December 2027
SLT Lead for Review	Operations Manager

**If this policies or procedure is not reviewed in line with the review date indicated then this version remains valid until such time it is updated and reviewed.**