

# The Wave Privacy Notice

The Wave is a service provided by Forward Outcomes Partnerships, in partnership with Northamptonshire Public Health and Northamptonshire Childrens Trust (LAC and CIC). The Wave is committed to protecting your privacy and being transparent about how we process your personal information. This document describes what data we collect, why we collect it, how we use it, how we keep it secure, and the conditions under which we share it. It also outlines your rights under the General Data Protection Regulation 2016 and the Data Protection Act 2018.

## What is The Wave?

The Wave will offer up to 6 months of support and will be delivered through a person centred, relationship-based model with a trauma informed approach - through 1:1 work, being flexible to your needs.

Work with each young person will be individualised, depending on their needs and goals. However, key themes of work are:

- Healthy relationships and support networks ·
- Emotional, mental and physical health - including sexual safety ·
- Building positive relationships, trust and confidence with relevant professionals and services ·
- Focus on self-esteem, hopes and aspirations ·
- Safe and stable accommodation ·
- Exploitation · Criminal justice involvement and gang involvement ·
- Access to education, training or employment.

## Who are we?

The Wave is a service provided by Forward Outcomes Partnership, a company incorporated in England, registered at Companies House (**11820613**) commissioned by Northamptonshire Public Health to deliver this service.

The Wave will collect information about you in order to provide the service described above. By collecting information from you we can better identify your individual needs and how best to support you whilst on the programme. In data protection terms:

- Forward Outcomes Partnership who manage The Wave are the Data Controller
- The following organisations are also Independent Controllers in their own right
  - Northamptonshire Children's Trust (referring organisation)
  - Northamptonshire Public Health (Commissioner)

For a more detailed explanation about what a Data Controller is, please visit the Information Commissioner's Office [website](#).

You can learn more about how we process your information by clicking the links below:

- [What personal information do we process?](#)
- [How we use your information](#)
- [Sharing your information](#)
- [Research and evaluation](#)
- [Consent](#)
- [Protecting your information](#)
- [Keeping your information](#)
- [Your individual rights](#)
- [Contact Us](#)

## **What personal information do we process?**

- Personal details such as your name, address, contact details
- Physical and mental health conditions
- Family details e.g., next of kin information
- Information regarding your lifestyle and social circumstances
- If you provide it, socio-demographic information such as your ethnicity and religion

We cannot process your information without having a valid, lawful reason for doing so. The primary basis for processing data for this service is for the purpose of Direct Care, in accordance with Article 6 (1)(a) and Article 9 (2)(h) of the Data Protection Act.

## **How we use your information**

The Wave process your information to provide you with the best possible support whilst on programme, as well as to meet the requirements of our contracts and other legal obligations. Key reasons for processing your information are:

- To sign you up to the programme. We will receive information including name, address, date of birth, and when we initially meet with you, we will collect further information directly from you.
- Maintaining contact with you throughout the support process e.g., appointment bookings, progress notes.
- Referring you on to other appropriate organisations following initial discussions with you. Your information will only be shared with those that need to know, with the minimum amount of information being shared, and always with your verbal or written consent.

We endeavour to provide you with the highest quality of service and therefore need to keep information about you, your health, the services and care we have provided and those which we plan to provide to ensure that:

- We provide a good basis for any support or advisory services we offer to you.

- The support and the services we provide are safe, effective, appropriate and relevant to you.
- We work effectively with others providing you with treatment, support, advice or other health related services.

Your information may also be used for:

- Performance monitoring and quality assurance purposes to help us assess the quality and standard of our services to you and in order to help us meet contractual requirements with our delivery partners and commissioners.
- Conducting investigations in response to a complaint or enquiry.
- Accounting and record keeping e.g., keeping accounts related to business activities and financial management.
- Research and evaluation such as participating in feedback surveys.

## Research and evaluation

In order to ensure that we provide you with the best possible service, we may from time-to-time conduct research and evaluation. Sometimes we will do this by aggregating and anonymising the data, which means that no one can identify you. On occasion we may ask you to take part in a new piece of research and provide additional information or share your personal information with a third party for the purpose of research, this will only ever be done with your knowledge and consent.

## Sharing your Personal Information

Our aim is to assist you as best as possible during the time that we provide support to you. As such, we may work with other organisations to identify certain services that we think you could benefit from. In this way, you do not have to repeat yourself and provide the same information over again. We may therefore share information about you with the following partner organisations to support the service we provide and to assist with your care:

- Bridges Outcomes Partnerships who provide HR, Quality Assurance and Financial Services to The Wave.
- Organisations who are evaluating the service that we are providing you.
- Other organisations who you would benefit from being referred into.

Northamptonshire Public Health who are the commissioners of this support, stipulate within our contracts with them what information is to be shared, how we share it and the information security requirements that must be adhered to.

To ensure the appropriate people are involved in your care in line with your wishes, to protect the health of the general public or to check the quality of service we have given you; with your consent (and in line with strict information sharing protocols), we may also share your information with:

- Social Services
- Education Services
- Local Authorities

We **will not** share information that identifies you to any third party, other than those listed above for any reason, unless:

- You ask us to do so.
- We ask and you give us specific permission to do so.
- We are required to do this by law e.g. by request of a court order.
- We are required to share personal information with other organisations, such as the HRMC or law enforcement agencies for the detection and prevention of fraud and other crime.
- We are required to share information for financial or audit purposes .
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality e.g. to prevent someone from being seriously harmed .

We do not transfer your personal information outside the EEA.

## **Consent**

Where we need your agreement to process your information, for example, to pass your contact details to someone offering a specific service, we will ask for your consent, and will clearly state why your information is needed and who we will share your information with. If you agree to your information being shared, we will record this on your record. We will regularly review consent to make sure that the relationships, and purposes for processing, have not changed.

## **Right to Withdraw Consent**

Where you have provided consent for us to share your information with a specific organisation or individual, you have the right to withdraw your consent at any time. Should you wish to withdraw your consent, please tell a member of staff, or, send a written request to the Data Protection Officer ([dpo@bridgesoutcomespartnerships.org](mailto:dpo@bridgesoutcomespartnerships.org)), who will process your request.

## **Protecting your information**

We are committed to taking all reasonable measures to ensure we maintain the confidentiality and security of personal data for which we are responsible, whether electronically or on paper. We do so to ensure that we are always compliant with data protection laws and information security standards, for example, the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA) and the Human Rights Act 1998 (HRA – as our service is commissioned by a public body)).

The Wave will ensure that there are appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

All our staff are required to complete mandatory data protection and information security training to ensure they understand their responsibilities in relation to processing your personal information. Internal and external audits are also undertaken to ensure that data protection laws are being complied with.

All participating organisations that provide services to The Wave are registered with the Information Commissioner and have appointed a Data Protection Officer (where appropriate).

## Keeping your information?

The Wave are required to retain your information as part of our legal obligations and the contractual obligations. We will not retain your information for any longer than is necessary and where we are no longer required to keep your information, it will be safely and securely destroyed. The following table provides you with summary information on how long we may keep your information:

Type of Information	Length of time
Your participant file	1 year from the end of the programme
Information relating to fraud or any legal complaints you have made against us	For as long as we reasonably consider that you might legally bring an additional or repeat claim against us or to meet other statutory obligations
Financial information relating to payments we have made to you whilst on the programme	Six years following the end of the tax year
Statistical and anonymised data that has come from your personal information.	This data would not be considered personal information and will be kept as long as is necessary to support this and similar programmes across the UK.

## Your rights

The Data Protection Act 2018 grants you certain rights regarding your personal information and the way in which it is processed. This gives you more control over what organisations do with your information. These include the right to:

- be informed of why and how we process your data
- request a copy of the information we hold on you
- have any incorrect information updated and put right
- deletion of information, once we have no legal right to hold it
- restrict processing in certain circumstances
- object to unwarranted processing
- ask us to transfer your personal information to another organisation
- object to any automated decision-making including profiling.

## The right to be informed

We are committed to ensuring that you are always aware of what we are doing with your information and are kept abreast of any changes to the processing of your information. We do so through this Privacy Notice, which is reviewed and updated as and when required.

## **The right of access**

You have the right to ask for the personal information we hold about you. This is known as a Subject Access Request. However, while we will do our best to comply with your request, there may be circumstances where we are unable to fulfil your request, for example, where information we hold has been provided to us in confidence.

When requesting your personal information, you will need to include the following information:

- your full name, address and contact telephone number;
- any information used by the organisation to identify or distinguish you from others of the same name (account numbers, unique ID's etc);
- details of the specific information you require and any relevant dates.

## **The right to rectification**

We endeavour to ensure that the information we hold about you is always accurate, however, there may be instances where the information we hold is no longer up to date. You can ask that we rectify any information about you that is incorrect. We would be happy to rectify such information but may need to verify the accuracy of the information first. Please speak to a member of staff so that any inaccuracies can be investigated and corrected where necessary.

## **The right to erasure**

You have the right to request that certain personal information be erased from our systems if you feel that there is an underlying legal issue to us processing your information, or, where you withdraw your consent.

While you may request for your information to be erased, this does not mean that we will necessarily be able to comply with your request, as there may be a legal reason that we are required to keep your information. As such, each request is considered on a case-by-case basis.

## **The right to restrict processing**

You have the right to request us to 'restrict' the processing of your personal information, for example, if you are unsatisfied about the accuracy of the data and we undertake an investigation. We can continue to use your personal data following a request for restriction where we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or the company.

## **The right to data transfer to another organisation (portability)**

You have the right to request us to provide you with a copy of the personal information that you have provided to us, and which we process electronically. The data must be in a machine-readable format that

facilitates transmission from controller-to-controller. This allows you further use of the data and enables you to move between service providers without any loss of data.

While you may request data portability, this does not mean that we will be able to comply with your request, as there may be reasons that we are unable to comply your request. As such, each request is therefore considered on a case-by-case basis.

## **The right to object to how we use personal information**

This allows you to object to any of the following processing activities, however, The Wave do not currently carry out processing of this nature:

- Direct marketing
- Scientific/historical research and statistics
- Legitimate interests and processing regarding the performance of a public interest or official authority task
- Transfers of your data outside of the EEA
- Automated decision making, including profiling

## **Contact Us**

Please contact our Data Protection Officer at [dpo@bridgesoutcomespartnerships.org](mailto:dpo@bridgesoutcomespartnerships.org) if you have any questions about this privacy notice or the information we hold about you.

If you raise a query or complaint in relation to your data rights, we will endeavour to respond as soon as possible. Requests for a copy of your information will be responded to within a one-month period. If you are not satisfied with how The Wave is processing your information, you can write to the Information Commissioner's Office at: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **Review of this privacy notice**

We review this Privacy Notice to ensure we keep you up to date about what we are doing with your personal information and any changes in processing. This privacy notice was last updated on 01.04.2024.

**If you require this notice in a different format or you need further information or assistance, please contact the Data Protection Officer via the contact details listed above.**