



# PRIVACY POLICY (for service users)

This policy does not form part of your contract of employment. OTR may change this policy from time to time and you will be notified of changes. This policy will be applied equally, fairly, and without exception

## 1. POLICY STATEMENT

1.1 OTR understand that the privacy and security of your personal information is an important issue to you and we are committed to protecting it. We aim to be completely transparent on how we collect, process and store your personal information.

1.2 We use your personal information to provide appropriate support services to you, to support your wellbeing, to protect others and to help keep our services going by showing our funders the work we are doing.

## 2. RESPONSIBILITIES

2.1 As with all OTR governance, ultimate responsibility for the policies and their implementation rests with the trustees.

2.2 It is the responsibility of the Chief Executive to ensure this policy is delivered consistently at OTR.

2.3 All staff and volunteers working on behalf of OTR are responsible for respecting your privacy.

## 3. WHO WE ARE

3.1 OTR is a mental health social movement by and for young people aged 11-25 in Bristol and South Gloucestershire, UK.

- Registered address: 8-10 West Street, Old Market, Bristol BS2 0BH.
- Registered email: [web@otrbristol.org.uk](mailto:web@otrbristol.org.uk)

3.2 We are a registered charity and company.

- Registered Charity Number 1085351
- Registered Company Number 4150044

3.4 We are registered with the Information Commissioner's Office (ICO)

- ICO Number: Z3251621
- Data Controller: Karen Black  
[karen@otrbristol.org.uk](mailto:karen@otrbristol.org.uk)

## 4. WHAT INFORMATION DO WE COLLECT?

4.1 We collect different data depending on what services you sign up for and where you sign up. 'Signing up' is the process of becoming involved in a group, service or project by OTR.

If you sign up for a service via our website ([otrbristol.org.uk](http://otrbristol.org.uk)), we collect your:

- Name
- Date of birth
- Postcode
- Email address
- Phone number
- Choice of service

If you sign up for a service via our Hubs and when you start accessing a service, we collect your:

- Name
- Date of birth and your age
- Home address & Postcode
- Email address and mobile &/or Landline phone number
- Contact details of someone we can call if we are worried about your safety
- What support you'd like to receive from OTR
- GP surgery
- Ethnicity
- Preferred language(s) you use
- Gender/gender identity and preferred pronoun
- Religious group (if any)
- Any current or previous Social Care and/or CAMHS referrals
- If you are a looked-after child
- Whether you are in education, employment or unemployed/not in training
- Personal hopes
- Risk and safeguarding information
- History of what you have consented to us processing (where applicable)
- Any disability you may have

- Any support services we signpost you to
- Notes about each support session you attend
- Number of children, young people and parents who attend HUBs, internal and external workshops and pop-up shops.
- Feedback about our services

4.2 In certain circumstances some therapists may need to video or audio record sessions for training purposes. You will be advised about this before you attend your first session and you always have the option to refuse consent to record. If you do consent to recording you'll need to sign a consent form. You can change your mind about giving consent to record at any time.

4.3 If you sign up for the OTR Newsletter, we collect your:

- Name
- Email address

## 5. WHY COLLECT MY DATA?

5.1 We collect your data so we can:

- Provide a service to you (that we have been funded to do)
- To give you information about new services or ways to get involved with the organisation
- Enter into a contract with you – e.g. provide you with a voluntary role or a job

And to meet our legal responsibilities in the following areas:

- Data protection/privacy/GDPR
- Marketing and communications
- Employment, equalities, housing / homelessness, care, health
- Safeguarding, crime/policing/criminal justice
- Financial security and fraud prevention
- Environment and health and safety
- For business accounting, insurance and tax purposes

5.2 We will occasionally send you marketing information where we have assessed that it is beneficial to you as a supporter and also in our interests. This could be by text, email, or post. Such information will be non-intrusive and is processed on the grounds of legitimate interests or by consent from you, depending on our relationship.

## 6. WHERE DO YOU GET MY DATA?

6.1 We get your data when you sign up for a service online or at a Hub, when you sign up for the newsletter online, or when we get a referral from your school, GP or NHS CAMHS.

## 7. HOW DO YOU USE MY PERSONAL INFORMATION?

- Personalisation of user experience and providing you with the most appropriate service
- To respond to contractual requirements with our funders
- Reporting to funders and internal data requirements on how our services are used and by whom
- Marketing and newsletters (only if this has been selected on the website)
- To receive feedback on our services
- When there is risk or a safeguarding issue
- For therapists' ongoing professional development (recording of sessions)
- To administer our website
- For internal audits
- For any other purposes which we will notify you about

## 8. LEGAL BASIS

8.1 The 'legal basis' is our reason under data protection law for having this information. You can find out more about these at <https://ico.org.uk>

8.2 In order to lawfully collect, hold and use your personal information, we must rely on one or more of six grounds set out in data privacy law. We consider the following to be relevant to our use:

- Where you have given consent (for example, for us to store information about you, for us to share anonymised information about you with our funders, or to receive our newsletter by email, and we may ask for your explicit consent to collect certain types of sensitive information).
- Where it is necessary to comply with a legal obligation (for example, if there is a risk of harm or criminal activity).
- Where it is necessary for the performance of a contract with you or take steps at your request prior to entering into a contract (for example if you want to be added to a wait list and then access one of our support services)
- Where it is necessary to protect someone's vital interests. We may refer these enquiries on to those

better equipped to assist if we feel yours or another's vital interests are at risk.

- Where there is a 'legitimate interest' in us doing so.

## 9. SHARING YOUR PERSONAL DATA

9.1 When you have signed a consent form to give permission for your data to be shared, it can be shared with one or more of the following organisations as part of our contractual obligations to them. All data is anonymised, which means your name isn't disclosed.

- Mayden (secure IT system provider)
- NHS England and NHS Digital
- NHS Commissioners
- Sirona (funding provider)
- CAMHS
- Bristol City Council
- South Gloucestershire Council
- Other funders who offer donations for specific projects/services

9.2 All of the above also have a contract with us and are expected to comply fully with this Privacy Notice, the data protection laws and any other appropriate confidentiality and security measures.

9.3 On occasion, we share 'success stories' with funders, in which all personal information and data is anonymised.

9.4 We would also need to share data to prevent harm or criminal activity (See our Safeguarding Children and Child Protection Policy, and our Safeguarding Adults Policy).

9.5 Video/audio recordings will be shared with teaching staff and other trainee therapists. They also have to comply with this Privacy Notice, the data protection laws and any other appropriate confidentiality and security measures.

## 10. STORAGE

10.1 We store data on a secure IT system called IAPTus. Mayden, the company behind IAPTus is ISO 27001:2013 accredited. This internationally recognised information security management standard ensures that a business has strict processes in place to identify, manage and reduce risks to information security.

10.2 There is a secure three step log-in process to access records and only trained staff and volunteers are allowed to access any information held in IAPTus.

10.3 We may also hold confidential paper records for some of our services. All paper records are securely destroyed once the information has been transferred to IAPTus.

10.4 We also store data in Excel Spreadsheets and/or Word Documents. This data will be the number of children, young people and parents who attend workshops and give feedback. The spreadsheets and documents are only available to staff and volunteers. These spreadsheets are stored securely on our google business server.

## 11. CONSEQUENCES OF NOT GIVING CONSENT

11.1 If you choose to not provide any data or give consent to us storing your data we will be unable to provide you with a support service. We need to know your name, age, contact details and choice of service in order to provide you with support.

## 12. HOW LONG WILL YOU HOLD MY INFORMATION FOR?

12.1 We hold your information for six years in total. Where we have a concern about your safety we hold your information for ten years. We hold your information for this long because the law requires us to (in the case of safeguarding) adhere to a 'statute of limitation'. After this time your data will be deleted from our system.

## 13. UNDER 16s

13.1 OTR is an organisation for young people aged 11-25. That means our priority, ethics and delivery are focussed on offering young people a service that is credible and has integrity through their eyes. To this end what we offer is free, confidential and accessible by self referral; in other words, our support can be accessed independently of adult guidance or oversight.

13.2 This position is not just an ethical one, it is backed up by law. The Equality Act (2010) lists a number of protected characteristics which must not be used to discriminate against (directly, indirectly or by association). These characteristics include age, sex, sexual orientation, gender reassignment, race, disability, religion and belief among others.

13.3 The younger of those who access our service (under 16) are entitled to this same protection of their rights assuming they are Gillick competent. In such cases 'the rights of parents yield to the child's right to make their own decisions when they reach a sufficient understanding and intelligence to be capable of making up their own mind on the matter requiring decision' (Lord Scarman in Gillick v West Norfolk, 1985).

13.4 OTR offers a variety of support and projects targeted at young people belonging to equalities groups and believes strongly that adults should not obstruct access to these on either legal or ethical grounds. The support we offer can and often is central to overcoming discrimination as well as developing a strong sense of self and confidence.

13.5 OTR will though share information responsibly and work with parents and adult professionals where this is led by the wishes of the young person accessing our support or where we believe there to be a risk of significant harm.

## 14. YOUR RIGHTS

14.1 You have the right to:

- Access personal information we have stored about you
- Correct and delete any information
- Withdrawal your consent for OTR to store, process or share information
- Lodge a complaint with the Information Commissioner's Office or with OTR

14.2 Any request to access personal information need to be in writing and we also need to confirm the identity of the person making the request eg: by checking a passport, birth certificate etc.

14.3 If your records include a letter or additional information from another service, e.g. your doctor, consent from this person needs to be obtained before the contents of the correspondence is disclosed because data protection is also granted to third parties.

14.4 You can email or phone us with any data questions:

Telephone: 0808 808 9120  
Email: [hello@otrbristol.org.uk](mailto:hello@otrbristol.org.uk)

## 15. THIRD PARTY CONTENT

15.1 OTR regularly includes links to related websites which are not maintained by OTR. These links are provided so that our audience can discover additional relevant information, which they may wish to explore.

15.2 OTR is not responsible for the content of external websites. The inclusion of a link to a third party website, from the OTR website, should not be understood as an endorsement.

15.3 All links from OTR's website are deemed to be relevant to the content or values expressed by OTR, or to

the page they are linking from and are suitable for the likely audience.

15.4 We will not normally link to sites which are not free to access.

15.5 We will not link to external sites in return for donations or any other consideration in kind.

15.6 The external links on the OTR site are reviewed and varied on an ongoing basis, according to relevance.