



Waymarks

Privacy Notice (Employees)

Introduction

We, Waymarks, are the ‘controllers’ of the information which we collect about you (‘personal data’). In this Privacy Notice we will use the word ‘process’ which covers most things that can be done with personal data, including collection, storage and destruction of that data. Being controllers of your personal data, we are responsible for it, and this notice explains why and how we process it.

Waymarks is part of Dimensions Group.

We are a Social Care organisation and our contact details are:

Address:	Building 1430, Arlington Business Park, Theale RG74SA
Email:	info@waymarks.org.uk
Telephone number:	03003039001 ext. 1119

Our Data Protection Officer (DPO) is George Balmer, who you can contact at george.balmer@dimensions-uk.org if you have any queries about this notice or anything related to data protection.

Your personal data

‘Personal data’ is any information that relates to a living, identifiable person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

We are committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process data if we need to for a specific purpose, as explained below.

We collect your personal data mostly through our contact with you, and the data is usually provided by you, but in some instances we may receive data about you from other people/organisations. We will explain when this might happen in this Notice.

How and why we process your data



In general terms, we process your data in order to manage our relationship with you. The table below lists more specific purposes for processing your data, and the legal basis for each type of processing.

Processing purpose	Legal basis for processing
<p>[Name of process and the purpose e.g. payroll, payment of tax, performance management, making adjustments for colleagues with disabilities, etc. N.B. If any of the processing includes profiling or automated decision making, highlight this specifically.]</p> <p>Employee checks Employment history Reference gathering Application information Eligibility to work DBS information Identification information Payroll Tax and NI HMRC Record keeping Performance management/disciplinary information Benefits Rota and time management Emergency contacts (next of kin) Training details Occupational health provider Equality Act</p>	<p>[The relevant legal basis from Article 6 of the GDPR. N.B. Where it is a statutory or contractual requirement, explain in detail what that requirement involves, and the possible consequences of the data subject not providing that data.]</p> <p>6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p>
<p>[The types of personal data processed for this purpose. N.B. Highlight any types of which are ‘special categories’.]</p> <p>Name and address details Contact details Bank details ID documents DBS check Driving licence details</p>	<p>[Where ‘special categories’ data is being processed, add the relevant legal basis from Article 9 of the GDPR.]</p> <p>6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for</p>



<p>Disability may be needed for reasonable adjustment</p> <p>[Highlight any of the types of data that are collected from a 3rd party and identify the 3rd party.]</p> <p>Data gathered from: Individuals Managers HR and Payroll External agencies HMRC DBS References Occupational health</p>	<p>compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p>
<p>[Include reference to any monitoring of internet use, email, devices, etc.]</p> <p>This is collected and stored on an online portal system which is password protected</p> <p>Same issue re shared drive</p>	<p>6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person</p>
<p>[Include reference to any use of CCTV that may record data subjects.] Not required</p>	<p>N/a</p>
<p>[Include reference to any photography that may capture data subjects.] n/a</p>	<p>n/a</p>

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.

Personal data received from third parties



This is a list of your personal data that we may receive from other people or organisations.

Data	Source
n/a	n/a

Who we share your data with

This is a list of the information we may share with internal recipients, and for what purpose:

Internal recipients	Processing purpose
[Name of internal colleagues or teams that colleague data is shared with, e.g. Payroll team, your manager, Facilities team, etc.] Payroll Benefits provider Occupational health Manager Learning and Development [The types of data shared with these recipients.] Bank details Name and address details Pay information Development and training needs	[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payroll, performance management, making adjustments for colleagues with disabilities, etc.] To ensure correct payment is made To ensure health and wellbeing of employees To enable the manager to have enough details to contact the person To share our benefits package Support development

For some processing purposes we share your data with third parties. This is a list of the information we may share with external recipients, and for what purpose:

External recipients	Processing purpose
<p>[Name of external recipients that colleague data is shared with, e.g. HMRC, etc.]</p> <p>HMRC CQC/Auditing</p> <p>N.B. Include data processors e.g. external payroll provider, but NOT software suppliers – they are included below in How we store your data.</p> <p>[The types of data shared with these recipients.]</p>	<p>[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payment of tax, etc.]</p> <p>To support court proceedings</p>

How we store your data

Your personal data is held in both hard copy and electronic formats. Electronic data, including emails, is stored [on our servers?], which are located [in the UK?] [and/or] on our software suppliers' servers [which are used and located as follows]:

Software	Processing purpose & Location
<p>[Name of software application] From IT</p> <p><i>N.B. Do not need to include software used to produce files that are then only stored on our own servers e.g. Microsoft Word or Excel.</i></p> <p>[The name of the software company that we are contracted with, for this software application.]</p>	<p>[The purpose for this data being shared with this recipient, ideally reflecting the listed processing purposes from the table above, but it may not need to be as specific as above e.g. holding colleague details, etc.]</p> <p>[The location of the software application's servers e.g. UK or European Union.</p> <p>N.B. If any are located outside the EU, identify this, and explain what safeguards are in place.]</p>



Transfers of personal data outside the European Union [delete this section if data is not stored or transferred outside of the EU]

We prefer to only store personal data in and transfer it to countries or jurisdictions where it will have an adequate level of protection or where we are able to provide appropriate safeguards and make sure that your rights as a data subject can be enforced.

Jurisdiction	Adequate level of protection / appropriate safeguards
Not required	

If we store or transfer personal data to other jurisdictions not mentioned above we will tell you about the transfer and the safeguards in place to protect your data, before the transfer.

How long we keep your data

Information about how long we process your data for can be found in our [see data retention policy/records.

Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to keep the data longer, or there are important and justifiable reasons why we should keep it, we will securely delete the data.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.



Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer: George Balmer on George.balmer@dimensions-uk.org



Waymarks

Privacy Notice (for families)

Introduction

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It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

We are committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process data if we need to for a specific purpose, as explained below.

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How and why we process your data

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Processing purpose	Legal basis for processing
<p>[Name of process and the purpose e.g. payroll, payment of tax, performance management, making adjustments for colleagues with disabilities, etc. N.B. If any of the processing includes profiling or automated decision making, highlight this specifically.]</p> <p>Contact details as part of an initial assessment Meetings LLA Meetings Surveys Emergency contact Sharing relevant information</p>	<p>[The relevant legal basis from Article 6 of the GDPR. N.B. Where it is a statutory or contractual requirement, explain in detail what that requirement involves, and the possible consequences of the data subject not providing that data.]</p> <p>6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p>
<p>[The types of personal data processed for this purpose. N.B. Highlight any types of which are ‘special categories’.]</p> <p>Name and address details Contact details Emergency contact Relationship to the person</p>	<p>[Where ‘special categories’ data is being processed, add the relevant legal basis from Article 9 of the GDPR.]</p> <p>6(1)(a) – Consent of the data subject 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the</p>
<p>[Highlight any of the types of data that are collected from a 3rd party and identify the 3rd party.]</p>	<p>6(1)(a) – Consent of the data subject 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the</p>



	controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.
[Include reference to any monitoring of internet use, email, devices, etc.] This is collected and stored on an online portal system which is password protected	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person
[Include reference to any use of CCTV that may record data subjects.] Not required	N/a
[Include reference to any photography that may capture data subjects.] This would be a possible Never Event (Should never happen)	n/a

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.

Personal data received from third parties

This is a list of your personal data that we may receive from other people or organisations.

Data	Source
n/a	n/a

Who we share your data with



This is a list of the information we may share with internal recipients, and for what purpose:

Internal recipients	Processing purpose
<p>[Name of internal colleagues or teams that colleague data is shared with, e.g. Payroll team, your manager, Facilities team, etc.]</p> <p>Managers CQC PD team Service teams</p> <p>[The types of data shared with these recipients.]</p> <p>Name and address and contact number (if appropriate) Contact details</p>	<p>[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payroll, performance management, making adjustments for colleagues with disabilities, etc.]</p> <p>To ensure we can contact you with any relevant information To update you about your family member. To gather information from you. To discuss involvement.</p>

For some processing purposes we share your data with third parties. This is a list of the information we may share with external recipients, and for what purpose:

External recipients	Processing purpose
<p>[Name of external recipients that colleague data is shared with, e.g. HMRC, etc.]</p> <p>CQC</p> <p>N.B. Include data processors e.g. external payroll provider, but NOT software suppliers – they are included below in How we store your data.</p>	<p>[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payment of tax, etc.]</p> <p>Contact information</p>



[The types of data shared with these recipients.] Contact details for quality checks	

How we store your data

Your personal data is held in both hard copy and electronic formats. Electronic data, including emails, is stored [on our servers?], which are located [in the UK?] [and/or] on our software suppliers' servers [which are used and located as follows]:

Software	Processing purpose & Location
[Name of software application] From IT <i>N.B. Do not need to include software used to produce files that are then only stored on our own servers e.g. Microsoft Word or Excel.</i> [The name of the software company that we are contracted with, for this software application.]	[The purpose for this data being shared with this recipient, ideally reflecting the listed processing purposes from the table above, but it may not need to be as specific as above e.g. holding colleague details, etc.] [The location of the software application's servers e.g. UK or European Union. N.B. If any are located outside the EU, identify this, and explain what safeguards are in place.]

Transfers of personal data outside the European Union [delete this section if data is not stored or transferred outside of the EU]

We prefer to only store personal data in and transfer it to countries or jurisdictions where it will have an adequate level of protection or where we are able to provide appropriate safeguards and make sure that your rights as a data subject can be enforced.

Jurisdiction	Adequate level of protection / appropriate safeguards
Not required	



If we store or transfer personal data to other jurisdictions not mentioned above we will tell you about the transfer and the safeguards in place to protect your data, before the transfer.

How long we keep your data

Information about how long we process your data for can be found in our [[see data retention policy/records](#)].

Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to keep the data longer, or there are important and justifiable reasons why we should keep it, we will securely delete the data.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer: George Balmer on George.balmer@dimensions-uk.org



Waymarks People we work alongside

Privacy Notice (for people we work alongside)

Introduction.

We at Waymarks, are responsible for the personal information which we collect about you (things that are personal to you and should not be shared with others). This is a privacy notice. In this Privacy Notice we talk about most of the things that can be done with your personal data, including collection, storage and destruction of that data. Us Waymarks being controllers of your personal data, we are responsible for it, and this notice explains why and how we process it.

Waymarks is part of Dimensions Group.

We are a Social Care organisation and our contact details are:

Address:	Building 1430, Arlington Business Park, Theale RG74SA
Email:	info@waymarks.org.uk
Telephone number:	03003039001 ext. 1119

Our Data Protection Officer (DPO) is George Balmer, who you can contact at george.balmer@dimensions-uk.org if you have any queries about this notice or anything related to data protection.

Your personal data

‘Personal data’ is any information that relates to a living, identifiable person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

We are committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process (use) data if we need to for a specific purpose, as explained below.

We collect your personal data mostly through our contact with you, and the data is usually provided by you, but in some instances we may receive data about you from other people/organisations. We will explain when this might happen in this Notice.

How and why we process your data



In general terms, we process your data in order to manage our relationship with you. The table below lists more specific purposes for processing your data, and the legal basis for each type of processing.

Processing purpose	Legal basis for processing
<p>[Name of process and the purpose e.g. payroll, payment of tax, performance management, making adjustments for colleagues with disabilities, etc. N.B. If any of the processing includes profiling or automated decision making, highlight this specifically.]</p> <p>Support Plan Involving Families -Listening, Learning and Acting Complaints & Compliments Safeguarding Accidents & Incidents Never Events Serious Incidents health action plan, personal agreement, assessment , information that someone who pays us to support you asks for us to collect.</p> <p>[The types of personal data processed for this purpose. N.B. Highlight any types of which are ‘special categories’.]</p> <p>Name/ DOB/ NEXT OF KIN/ LIKES/DISLIKES/ PERSONAL HISTORY/DESIRED OUTCOME/MEDICATION/ONE PAGE PROFILE INFO Next of kin/DESIRED OUTCOME Name of complainant/ Nature of complaint/ third party names if relevant/ outcome desired Nature of issue/ any third parties/ desired outcome Nature of issue/ any third party info, desired outcome. Risks and responses Nature of issue/ any third party info, desired outcome. Risks and responses Nature of issue/ any third party info, desired outcome. Risks and responses</p> <p>[Highlight any of the types of data that are collected from a 3rd party and identify the 3rd</p>	<p>[The relevant legal basis from Article 6 of the GDPR. N.B. Where it is a statutory or contractual requirement, explain in detail what that requirement involves, and the possible consequences of the data subject not providing that data.]</p> <p>6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p> <p>[Where ‘special categories’ data is being processed, add the relevant legal basis from Article 9 of the GDPR.]</p> <p>6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</p>

<p>party.]</p> <p>Data gathered from: Commissioners Care managers Social workers Hospital employees Members of the public MOJ Family members</p>	<p>6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p>
<p>[Include reference to any monitoring of internet use, email, devices, etc.]</p> <p>This is collected and stored on an online portal system which is password protected this system is but the actual information isn't</p> <p>Our shared drive which isn't the portal</p>	<p>6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)e-Processing is necessary for the purposing of invoicing relevant authorities for services delivered in relation to the individual</p>
<p>[Include reference to any use of CCTV that may record data subjects.] Not required at the moment</p>	<p>N/a</p>
<p>[Include reference to any photography that may capture data subjects.] We collect a photograph of the individual for support plan but this is only with their consent</p>	<p>6(1)(a) – Consent of the data subject</p>

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.



Personal data received from third parties

This is a list of your personal data that we may receive from other people or organisations.

Data	Source
Pen picture and detailed assessment documents	Hospital/Assessment and Treatment units
Hospital reports/medical information	As above
MAPPA	Local Authorities
MOJ information	MOJ
You	
Your family member and/or advocate	

Who we share your data with

This is a list of the information we may share with internal recipients, and for what purpose:

Internal recipients	Processing purpose
<p>[Name of internal colleagues or teams that colleague data is shared with, e.g. Payroll team, your manager, Facilities team, etc.]</p> <p>payroll Service Team Employees Marketing internal audit teams Housing</p> <p>[The types of data shared with these recipients.] Bank details and NI and address RTR and support documents Medical documents Financial information Outcomes</p>	<p>[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payroll, performance management, making adjustments for colleagues with disabilities, etc.]</p> <p>To ensure correct payment is made To ensure that we have enough information to support in line with our contract As above For promotional literature for sharing with relevant stakeholders To make sure we are doing the best job we can</p>

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For some processing purposes we share your data with third parties. This is a list of the information we may share with external recipients, and for what purpose:

External recipients	Processing purpose
[Name of external recipients that colleague data is shared with, e.g. HMRC, etc.] Commissioner etc... Safeguarding boards Safeguarding panels CQC where relevant Charity commission Mental health act commission HMRC/Inland Revenue N.B. Include data processors e.g. external payroll provider, but NOT software suppliers – they are included below in How we store your data. [The types of data shared with these recipients.]	[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payment of tax, etc.] Share outcomes and confirm successful completion of contractual terms As part of our legal obligations For tax or NI purposes (rarely) Reports Pay details Incident reports

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[Name of software application] From IT <i>N.B. Do not need to include software used to produce files that are then only stored on our</i>	[The purpose for this data being shared with this recipient, ideally reflecting the listed processing purposes from the table above, but it may not need to be as specific as above e.g. holding colleague details, etc.]



<i>own servers e.g. Microsoft Word or Excel.</i> [The name of the software company that we are contracted with, for this software application.]	[The location of the software application's servers e.g. UK or European Union. N.B. If any are located outside the EU, identify this, and explain what safeguards are in place.]

Transfers of personal data outside the European Union [delete this section if data is not stored or transferred outside of the EU]

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Jurisdiction	Adequate level of protection / appropriate safeguards
Not required	

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- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

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Waymarks

Privacy Notice (for Commissioners and external Stakeholders)

Introduction

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Email:	info@waymarks.org.uk
Telephone number:	03003039001 ext. 1119

Our Data Protection Officer (DPO) is George Balmer, who you can contact at george.balmer@dimensions-uk.org if you have any queries about this notice or anything related to data protection.

Your personal data

‘Personal data’ is any information that relates to a living, identifiable person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

We are committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process data if we need to for a specific purpose, as explained below.



We collect your personal data mostly through our contact with you, and the data is usually provided by you, but in some instances we may receive data about you from other people/organisations. We will explain when this might happen in this Notice.

How and why we process your data

In general terms, we process your data in order to manage our relationship with you. The table below lists more specific purposes for processing your data, and the legal basis for each type of processing.

Processing purpose	Legal basis for processing
<p>[Name of process and the purpose e.g. payroll, payment of tax, performance management, making adjustments for colleagues with disabilities, etc. N.B. If any of the processing includes profiling or automated decision making, highlight this specifically.]</p> <p>Contracts Invoicing References</p> <p>[The types of personal data processed for this purpose. N.B. Highlight any types of which are ‘special categories’.]</p> <p>Name and address details Contact details Bank details is this personal data as its company Role and responsibility</p> <p>[Highlight any of the types of data that are collected from a 3rd party and identify the 3rd party.]</p> <p>Data gathered from: Commissioners Care managers Social workers</p>	<p>[The relevant legal basis from Article 6 of the GDPR. N.B. Where it is a statutory or contractual requirement, explain in detail what that requirement involves, and the possible consequences of the data subject not providing that data.]</p> <p>6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p> <p>[Where ‘special categories’ data is being processed, add the relevant legal basis from Article 9 of the GDPR.]</p>

<p>Hospital employees including RC Probation officer Members of the public MOJ Family</p>	<p>6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller 6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.</p>
<p>[Include reference to any monitoring of internet use, email, devices, etc.]</p> <p>This is collected and stored on an online portal system which is password protected</p>	<p>6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 6(1)(c) – Processing is necessary for compliance with a legal obligation 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person</p>
<p>[Include reference to any use of CCTV that may record data subjects.] Not required</p>	<p>N/a</p>
<p>[Include reference to any photography that may capture data subjects.] n/a</p>	<p>n/a</p>

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.



Personal data received from third parties

This is a list of your personal data that we may receive from other people or organisations.

Data	Source
n/a	n/a

Who we share your data with

This is a list of the information we may share with internal recipients, and for what purpose:

Internal recipients	Processing purpose
<p>[Name of internal colleagues or teams that colleague data is shared with, e.g. Payroll team, your manager, Facilities team, etc.]</p> <p>Payments team Financial controller PD Team PA management</p> <p>[The types of data shared with these recipients.] Bank details RTR and support documents Role and responsibility</p>	<p>[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payroll, performance management, making adjustments for colleagues with disabilities, etc.]</p> <p>To ensure correct payment is made for invoices To ensure that we have enough information to support in line with our contract To ensure we have the right contact details. To review the work we are doing To make decisions in relation to people we work alongside in relation to their legal or other status.</p>



For some processing purposes we share your data with third parties. This is a list of the information we may share with external recipients, and for what purpose:

External recipients	Processing purpose
<p>[Name of external recipients that colleague data is shared with, e.g. HMRC, etc.] N/a Court proceeding</p> <p>N.B. Include data processors e.g. external payroll provider, but NOT software suppliers – they are included below in How we store your data.</p> <p>[The types of data shared with these recipients.]</p>	<p>[The purpose for this data being shared with this recipient, ideally matching up with a listed processing purpose from the table above, e.g. payment of tax, etc.] n/a to support court proceedings</p>

How we store your data

Your personal data is held in both hard copy and electronic formats. Electronic data, including emails, is stored [on our servers?], which are located [in the UK?] [and/or] on our software suppliers’ servers [which are used and located as follows]:

Software	Processing purpose & Location
<p>[Name of software application] From IT</p> <p><i>N.B. Do not need to include software used to produce files that are then only stored on our own servers e.g. Microsoft Word or Excel.</i></p> <p>[The name of the software company that we are contracted with, for this software application.]</p>	<p>[The purpose for this data being shared with this recipient, ideally reflecting the listed processing purposes from the table above, but it may not need to be as specific as above e.g. holding colleague details, etc.]</p> <p>[The location of the software application’s servers e.g. UK or European Union.</p> <p>N.B. If any are located outside the EU, identify this, and explain what safeguards are in place.]</p>



Transfers of personal data outside the European Union [delete this section if data is not stored or transferred outside of the EU]

We prefer to only store personal data in and transfer it to countries or jurisdictions where it will have an adequate level of protection or where we are able to provide appropriate safeguards and make sure that your rights as a data subject can be enforced.

Jurisdiction	Adequate level of protection / appropriate safeguards
Not required	

If we store or transfer personal data to other jurisdictions not mentioned above we will tell you about the transfer and the safeguards in place to protect your data, before the transfer.

How long we keep your data

Information about how long we process your data for can be found in our [see data retention policy/records.

Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to keep the data longer, or there are important and justifiable reasons why we should keep it, we will securely delete the data.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.



Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer: George Balmer on George.balmer@dimensions-uk.org