



SVP Privacy Policy and Procedure for Bradford Advice Team

Local Privacy Policy

Ownership:	Advice & Immigration Team Manager
Author:	CSP Management/Advice Team
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The Bradford LMG (local management group) have implemented a privacy policy to state how our Advice and Immigration team uses and protects the data you provide to us when receiving assistance from an advisor.

What Data we Collect

- Contact Information (email, address, telephone etc.)
- DOB
- Family Information (are you/do you have single, partner, pregnant, children etc.)
- Income (are you on benefits, do you work etc.)
- Benefits
- Health

Why we Collect this Data

- To provide accurate advice.
- To understand your needs.
- To further understand your entitlement to benefits and how we can help.

Requirements

Lawful

The processing of personal data is lawful provided that at least one of the principles set out in the DPL applies to the processing of personal data and where the personal data is a special category of personal data the relevant principle of the legislation also applies.

SVP ensures that there is no restriction preventing the processing it undertakes in relation to a service users' personal data as a matter of law separate to the DPL.

Fairness

SVP ensures that it operates fairly with service users by providing the service user the following information:

- the name of SVP as Data Controller
- the purposes/s for which the data are intended to be processed
- information on the rights and freedoms granted to the Data Subject by the DPL; and
- all other information relevant to the Processing

Transparent

SVP Bradford has developed this policy in such a way as to ensure that all processing and the application of this Policy is transparent to the Service User.

Processing Purposes

The Service Users' Personal Data are processed for the following purposes:

- providing any services or benefits;
- administration and archiving in relation to your services and benefits
- statutory and regulatory compliance;
- processing any enquiries or complaints raised by you and responding to any communications from you;
- transferring to third parties with whom we have a relationship;

Adequate, Relevant and Limited to What is Necessary

SVP shall ensure that all service user personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

SVP shall collect personal data from the service user and any relevant referee and other third parties, to ensure that it has adequate personal data to allow it to make all relevant decisions in relation to the service user – should SVP identify that it does not have adequate personal data to undertake all processing, it shall request the missing personal data from the service user or the relevant third party.

SVP shall only collect personal data which are relevant for the individual to receive services and benefits.

Where SVP identifies that it is no longer necessary to continue to hold personal data relating to a service user, such personal data shall be removed from the files and destroyed in a confidential manner or returned to the service user.

Accurate and, Where Necessary, Kept up to Date

SVP shall take every reasonable step to ensure that any inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay.

SVP shall ensure that personal data added to any contract management system or spreadsheet is correctly entered and audited following entry and any errors corrected.

SVP shall ask service users on a regular basis with intervals of not less than 12 months and not more than 24 months to review all personal data held about them and to provide corrections.

Where a service user has concerns about the accuracy of their personal data SVP will take such reasonable action as is necessary to ensure the accuracy of the information.

Storage

SVP shall keep all service user personal data in a form which permits identification of data subjects and ensure that personal data is stored in a manner which allows specific personal data to be removed should it no longer be necessary to SVP Bradford Advice and Immigration team to process the personal data.

Personal data relating to service users may be stored by SVP for longer periods than is strictly necessary insofar as the personal data will be processed solely for archiving purposes in the

public interest, scientific or historical research purposes or statistical purposes in accordance with the DPL.

Service users may in some circumstances request that SVP no longer continue to process their personal data. SVP will consider such request on a case-by-case basis and may not stop processing this personal data without instruction from a court.

Security

SVP shall ensure that all service user personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Any paper files will be kept:

- by the line manager
- in locked cabinets that are only accessible by authorised personnel

Any personal data that is stored within SVP's computer system is password protected.

Any laptops and data sticks that may be used to access personal data at SVP will be password protected, and the personal data will be encrypted.

SVP shall ensure that the servers on which personal data are stored remain secure.

Medical Records

SVP will process any service user medical records, if they are made available to SVP in accordance with the DPL and this policy.

Any medical information that is held by SVP will be used only as necessary in respect of the service users time receiving services and benefits from the SVP.

The information collected regarding any service user's health is restricted only to those who require the information.

Medical information used for statistical and general purposes is anonymised when required.

Your Rights

1. **Right to be Informed:** Individuals have the right to be informed about the collection and use of their personal data.
2. **Right of Access:** Individuals can request access to their personal data and information about how it's being processed.
3. **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete personal data.
4. **Right to Erasure:** Also known as the 'right to be forgotten', individuals can request the deletion of their personal data in certain circumstances.
5. **Right to Restrict Processing:** Individuals can limit how their personal data is used, for example: challenging accuracy of the data used/stored.
6. **Right to Data Portability:** Individuals can request a copy of their data in a commonly used format and transfer it to another organisation.
7. **Right to Object:** Individuals can object to the processing of their personal data in certain situations, such as for direct marketing.