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Description automatically generatedFeel Better Partington Privacy Policy

12th March 2024

**Our Contact Details**

Name: Hidden Treasure Trust

Address:The Hideaway, Partington Shopping Centre, Central Road, Partington, Manchester, M31 4EL

Phone Number: 0161 660 0299

E-mail: [admin@thehideawaypartington.com](mailto:admin@thehideawaypartington.com)

**Our Role**

We act as the gateway for the Feel Better Partington programme, which means we receive referral forms on behalf of the other organisations operating under the programme. The other organizations are Age UK Trafford, Be Active Leisure Urmston, BlueSci Partington, F92, Hidden Treasure Trust, Partington Family Practice and Trafford Leisure.

We will also provide cooking classes as part of the Feel Better Partington programme.

We will also assist service users who do not engage, or who stop, engaging with the programme to overcome any non-health related barriers that are preventing their participation. We will, where relevant signpost people, or contact a third party directly, or deal with any issues in-house.

**The Type of Personal Information We Collect**

We currently collect and process the following information:

* Personal identifiers, contact details and characteristics (for example, name contact details, and date of birth)
* Sensitive personal data: ethnicity, gender, health information, disabilities, and whether language translation is needed.
* Where a person attends our cooking classes, we will collect and process indormation in relation to any food allergies and dietery requirements.
* Where a person needs support with non-health related issues we will collect and process appropriate and relevant data only, for the purpose of signposting people, contacting a third party directly with the client present, or to deal with the issue in-house. This information may include, but is not limited to income details including wage, salary and welfare benefits, other financial information including debts, family and social circumstance details, any housing related issues. The information collected will be dependent on the circumstances of the person we are assisting.

**How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for the following reason:

* The ensure Feel Better Partington, and its service providers can work together to help our local residents to feel better and move towards better health.

We use the information that you give us to:

* To ensure that you meet the criteria for the Feel Better Partington Scheme.
* To ensure that we have your contact details.
* To ensure that the service providers under the Feel Better Partington have a basic understanding of your long-term health condition(s) and any disabilities, when you are referred to them.
* To understand if you need any support with language translation needs.
* To ensure that participants in our cooking classes have their food allergies and dietary requirements taken into account.
* To ensure that if people need support with non-health related issues that appropriate, signposting, or contact with third parties, or in-house support by Hidden Treasure takes place, and where information is shared with a third party they have sufficient information to help you.

We may share this information with the following service providers:

* Age UK Trafford
* Be Active Leisure
* BlueSci Partington
* F92
* Hidden Treasure Trust
* Partington Family Practice
* Trafford Leisure

after discussion with you, so that you can access the services that will help you to feel better and move towards better health. Each organisation will operate under its own privacy policy once they have been referred to you.

Service providers may subsequently share personal information between themselves, and another service provider listed above, and only for a service users benefit, for example, a person may outgrow an exercise class, and the service user may be referred to another service provider who offers a higher-level program of exercise.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent. You can remove your consent at any time. You can do this by contacting Hidden Treasure Trust at the contact details listed at the top of this document.**

**(f) We have a legitimate interest, so that** Feel Better Partington and its service providers can work together to help local residents feel better and move towards better health.

* **We will collect your data from an online referral form that you, or someone on your behalf can complete.**
* **The referral form includes three consent sections, these allow us to share your information to other service providers under the Feel Better Partington program, and to store your data on a database.**
* Upon receipt of a referral form, we will contact you to discuss the Feel Better Programme and to assist you to work out what services may benefit you. We will then share your data with the relevant service provider(s).
* **When we share your data, the service provider(s) will be given a two-factor authentication code, to access your record on our database. We do this to allow** the relevant service provider to contact you directly, and for them to have a basic understanding of your long-term health condition(s), any disabilities you may have, and any requirement for language translation.
* **Not all the service providers can encrypt data when passing on information, we will therefore ask each of these service providers to share your initials and customer number when communicating with each other to protect your identity.**
* Hidden Treasure Trust will contact you when a service provider has been unable to contact you, or you have stopped engaging with the program, so that we can help you to address some or all your more urgent non-health related problems that may be preventing you from accessing the Feel Better Partington Programme. This process will involve signposting you to other agencies, or where appropriate and with your consent contacting an agency directly with you present. We will record all such interactions so we can help support you.
* Hidden Treasure Trust will also contact you should you wish to utilise the healthy cooking classes we are running under the Feel Better Partington program. We will then ask you to complete an additional referral form, so we can record any food allergies and dietary requirements; this information will be passed to our chef who is running the classes, and no one else.

**YOUR RIGHTS**

You have the following rights:

* The right to ask for a copy of personal data that we hold about you (the right of access).
* The right (in certain circumstances) to request that we delete personal data held on you; where we no longer have any legal reason to retain it (the right of erasure or to be forgotten)
* The right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you (the right of rectification)
* The right to opt out of any marketing communications that we may send you and to object to us using / holding your personal data if we have no legitimate reasons to do so (the right to object)
* The right (in certain circumstances) to ask us to ‘restrict processing of data’ which means that we would need to secure and retain the data for your benefit but not otherwise use it (the right to restrict processing)
* The right (in certain circumstances) to ask us to supply you with some of the personal data we hold about you in a structured machine-readable format and/or to provide a copy of the data in such a format to another organisation (the right to data portability).

If you wish to exercise any of the above rights, please contact us using the contact details set out above.

**How we store your personal information**

Your information is securely stored on a cloud database which can be accessed by Hidden Treasure Trust. The other service providers will only be able to access your data if you have been referred to them. For security, access to the database will be through a two-factor authentication code. **All data transferred to and from the database will be encrypted.**

When we share your personal information with other service providers, Hidden Treasure Trust and some of the other service providers may not be able to encrypt the data they share. In such circumstances we will only share your initial and customer number to help protect your identity.

We keep your personal identifiers, contacts, characteristics, and sensitive data for up six months after the programme finishes. This period will allow anonymised data reporting to evaluate the effectiveness of the scheme.

We will then dispose of your information by deleting all data in the Airtable Cloud database. Upon deletion, Airtable will offer a retention period of up to 2 months, before permanently deleting your data.

**Your Data Protection Rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. However, if the request is complex or the service user makes more than one request, the response time may be a maximum of three calendar months, starting from the day of receipt.

Please contact us at the above contact details if you wish to make a request, it will assist us if you clearly mark your request as relating to the Feel Better Partington programme.

**How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Hidden Treasure Trust

The Hideaway

Partington Shopping Centre

Central Road, Partington

Manchester

M31 4EL

Telephone: 0161 660 0299

E-mail: [admin@thehideawaypartington.com](mailto:admin@thehideawaypartington.com)

You need to make sure that your request says in relates to the Feel Better Partington Programme.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>