

Buckinghamshire Safeguarding Adults Board Privacy Notice

1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

2. Who we are

The Buckinghamshire Safeguarding Adults Board (BSAB) is a statutory body established under the Care Act 2014. It is independently chaired and consists of senior representatives from the key agencies and bodies which have regular contact with Adults with care and support needs.

The statutory objectives of the BSAB are to:

- Coordinate local arrangements to safeguarding and promote the welfare of Adults with care and support needs.
- Ensure that these arrangements are effective

The functions of Local Safeguarding Adults Boards are set out in more detail in Care Act Guidance (14.136):-

- it must publish a strategic plan for each financial year that sets how it will meet its main objective and what the members will do to achieve this. The plan must be developed with local community involvement, and the SAB must consult the local Healthwatch organisation. The plan should be evidence based and make use of all available evidence and intelligence from partners to form and develop its plan
- it must publish an annual report detailing what the SAB has done during the year to achieve its main objective and implement its strategic plan, and what each member has done to implement the strategy as well as detailing the findings of any safeguarding adults reviews and subsequent action
- it must conduct any safeguarding adults review in accordance with Section 44 of the Act.

Our registered office address is:

Buckinghamshire Safeguarding Adults Board
4th Floor
County Hall
Walton Street
Aylesbury
Bucks
HP20 1UZ

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at bsab@buckinghamshire.gov.uk.

This policy also covers any additional personal data collected through our websites, by telephone, through emails and through any related social media applications.

3. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest
- To initiate and complete commercial transactions with you (i.e. payment for training courses)
- To fulfil a contract that we have entered into with you or with the entity that you represent
- To ensure the security and safe operation of our website and underlying business infrastructure, and
- To manage any communication between you and us.

The table in Section 4 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

Technical information – in relation to the BSAB website

In addition, and in order to ensure that each visitor to our website can use and navigate the site effectively, our website hosts Phew.org.uk collect the following:

- Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet
- Your login information, browser type and version, time zone setting, browser plug-in types and versions
- Operating system and platform
- Information about your visit, including the Uniform Resource Locators (URL) clickstream to, through, and from our site.

Our cookies policy, which can be viewed from the home page of our main web site and our online policies and procedures manual, describes in detail how we use cookies.

In Section 7 below, we identify your rights in respect of the personal data that we collect and describe how you can exercise those rights.

4. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for collecting and holding this data. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

When we collect data we apply the following tests to determine whether it is appropriate:

The purpose test – is there a legitimate interest for the collection of data?

Necessity test – is the data necessary for that purpose?

Balancing test – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for collection of data	Data shared with?	Retention period – will need looking at
1. To provide you with information	Subject matter information	Name Organisation Email address	To provide appropriate online or email information / updates about safeguarding that you have requested	Legitimate interest	Internally only	Maximum 10 years from the date the information is collected.
2. Transactional information	Transaction details	Name, physical address, email address, telephone number, bank account details or internal cost centre details	To process purchase transactions for products and services with customers, and to ensure any transaction issues can be dealt with.	Contractual performance	Internally only	Maximum 8 years from the date of the performance of the contract.
			For accounting and taxation purposes	Statutory obligation	Internally and professional advisers	6 months from the date the data subject has input personal information but has not proceeded with a transaction.
			Documentation should any contractual legal claim arise	Legitimate Interest	Internally and professional advisers	8 years for VAT records from the performance of the

						contract
3. Fulfilment information	Fulfilment data	Name, dietary requirements	Appropriate catering arrangements for training courses	Contractual performance	Internally and training venues	Maximum 6 years from the date of the performance of the contract.
		Name, contact and identification details	Access to training courses, attendance registers	Contractual performance	Internally and training venues	
		Name, Organisation, , email address, contact details	To enable booking of places at events, training courses etc.	Contractual performance	Internally and any third party logistics or supplier companies with whom we contract in order to fulfil these requirements. (might leave this in in case we ever use Event Brite?)	
4. Security	Security information	Technical information, as described above, plus any other information that may be required for this purpose	To protect our websites and infrastructure from cyber attack or other threats and to report and deal with any illegal acts.	Legitimate interest	Internally, forensic and other organisations with whom we might contract for this purpose.	Relevant statutes of limitation
5. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	Legitimate interest	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.

5. Storage of personal data

The BSAB is a UK based organisation whose primary offices are in the UK.

- Our website and web applications are hosted in the UK and are accessed only by our UK-based staff.

- Our customer relationship management, marketing and accounting systems for our organisation are UK based.
- Our payment processors and banking arrangements are based in the UK.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table at 4, above.

6. Security measures

We have what we believe are appropriate security controls in place to protect personal data. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

7. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email bsab@buckinghamshire.gov.uk or use the information supplied in the Contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**

As an organisation we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- **The right to data portability**

You may request your set of personal data be transferred to a third party. This will be provided in a commonly used format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research;
- Processing involves automated decision-making and profiling.

8. Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to bsab@buckinghamshire.gov.uk

Alternatively, you can contact us using the following postal address or telephone numbers:

Buckinghamshire Safeguarding Adults Board
4th Floor
County Hall
Walton Street
Aylesbury
Bucks
HP20 1UZ

Telephone: 01296 383758

Our office is open 9.00 am – 5.00 pm Monday to Thursday and 9.00am – 4.30pm on Friday. If necessary our team will take a message and ensure the appropriate person responds as soon as possible.

9. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above? All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.