

Prepared by: M Franklin	Pathways Community Interest Company	
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Approved by: Yvonne Clarke		
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Pathways CIC Privacy Policy

Date Issued: May 2018

Date to be Reviewed: May 2026

Issued by Yvonne Clarke

Whilst Pathways CIC board will endeavour to ensure that policies are reviewed within the identified period, there may be times when a policy update and release are delayed. Where this occurs, there will be an automatic extension applied to the current policy until such time that the policy can be updated and put into circulation.

PRIVACY POLICY

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1. PURPOSE

Pathways Community Interest Company (Pathways CIC) respects your privacy and has developed the following policy to demonstrate our commitment to service users and visitors to our website. This privacy policy describes how we collect personal about you as a service user or visitor to our websites www.pathwayscic.co.uk, and how this data is collected, stored and processed. This policy, along with Pathways CIC's Information Management Systems governs privacy practices across the organisation.

This privacy policy and any privacy policy or statement of suppliers that support the development or that operate functions of the website on behalf of Pathways CIC is to be read in conjunction.

2. INTRODUCTION

Pathways CIC, is a not-for-profit company limited by guarantee, incorporated and registered in England and Wales, company registration 05774171. Pathways CIC is the data controller under data protection legislation.

Pathways CIC is the owner of www.pathwayscic.co.uk and the website which it maintains. For the purposes of data protection legislation, Pathways CIC is the data controller.

Pathways CIC is committed to protecting your privacy and processing your data in accordance with the Data Protection Act 2018 (DPA) and the UK GDPR (General data protection regulation).

3. INFORMATION WE COLLECT ABOUT YOU

3.1 Personal information we collect when you use Pathways CIC's services or visiting our websites will include:

- Your name, DOB, address, email address, age, health conditions, GP details, employer details and any other information you voluntarily provide to us
- Your IP address (which is a unique identifier that computers and devices used to identify and communicate with each other) which is automatically recognised by the web server

3.2 Receiving support from Pathways CIC

When accessing support from one of Pathways CIC services, we may be in receipt of personal information that has been shared by a third party (GP or other Health Care Professionals, Job Centre Plus) before we contact you. You should have consented to this information being shared prior. This information will be shared between organisations through protected channels (encrypted systems) that are tested regularly.

When in receipt of support from one of Pathways CIC's services, we will collect further personal information, termed special category information, from you in order for us to complete our records and provide the necessary support for your needs. This information will include:

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- Name, date of birth, gender, address, email address, up to 2 telephone numbers
- You will be asked to provide details of any existing or former health conditions and medication
- You will be asked to provide details of your employment status and given an option to provide details of your current or former employers
- You will be asked to provide details of any caring responsibilities, dependants
- You will have an option to provide information on your ethnicity and religion for equality reporting

We may use video conferencing tools using third-party providers that have been approved by Pathways CIC's Security Risk Officer and Data Protection Officer.

You may be offered a consultation via video conferencing. When accepting the invitation for video conferencing and entering the consultation we will accept this as your consent.

Please see "PROTECTING YOUR INFORMATION" for further details of how we handle personal and confidential information. Video conference calls will not be recorded or stored. Third party providers have their own Privacy Policy available to view. You can access directly from the providers website.

3.3 Employment Applications

For those with an interest in applying for employment opportunities with Pathways CIC, personal information will be gathered and handled by authorised Pathways CIC personnel and /or suppliers, external representatives and third parties engaged specifically to support Pathways CIC in conducting recruitment and selection or onboarding activities and for employment purposes in respect of successful candidates.

You may be asked to provide additional information not contained within your application or CV to assist the recruitment and selection process for example references or for security/vetting checks. If you chose not to provide this information, it may limit our ability to assess your suitability for employment and may result in us being unable to process your application.

Pathways CIC will keep records of all unsuccessful applicants for a period of 12 months in the event that an opportunity may open during this period. All applicants have a right to opt out. If and when opting out, Pathways CIC will destroy all application records in accordance with its Information Management Systems protocols.

4. HOW WE USE YOUR INFORMATION

Any personal information we collect and process is for legitimate business interests only, for the purpose of providing the services you have requested from us, and for performing the legitimate functions of local commissioning requirements.

On the basis of legitimate business interests, we may also use your personal information:

- To deal with your requests and enquiries
- To contact you for reasons relating to your enquiry
- To notify you about Pathways CIC's services
- To facilitate support from other service providers who we feel may be suitable to meet your needs (consent from yourself will be collected prior to contacting the provider)
- Pathways CIC's business is often developed through social innovation and therefore we may use anonymised data to demonstrate local population needs and direct future service design.

There is an administration portal where approved personnel can access data to help respond to your enquiry, update data and perform necessary administrative activities. All personnel are suitably trained.

Authorised personnel will use anonymised data to regularly monitor trends within Pathways CIC services as part of our commitment to continual improvement and business development.

5. SHARING YOUR INFORMATION

When in receipt of support from Pathways CIC's services, we will only share personal information with your consent. Organisations we are likely to share information with include:

- GP's and other Health and Social Care Professionals
- Other Health Services and Community Services
- Employers or Employment agencies such as Job Centre Plus
- Local Authorities

Pathways CIC may also share your personal information with the Police and other law enforcement and statutory agencies for the purposes of crime prevention or investigation and supporting work to safeguard children and vulnerable adults.

If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or investigation of a crime or that Pathways CIC is legally obliged to disclose. This is done only on a strict case by case basis and through controlled processes to ensure we are compliant with Data Protection Legislation.

6. PROTECTING YOUR INFORMATION

The data that we collect from you is held on encrypted systems that are tested regularly in accordance with DPA and UK GDPR guidelines. Pathways CIC diligently procures all IT providers, ensuring that they are able to demonstrate excellent standards in information security and encryption management. All personnel collecting your personal information will have undertaken specific information security systems training and will be regularly observed in accordance with Pathways CIC's Acceptable Use Policy and other information security policies.

Pathways CIC will be 'sub-contracted' for delivery of some of its services. In such instances, IT software will be provided by the 'Contractor'. This again will be subject to security testing, regular training for personnel and regular monitoring, governed by both Pathways CIC and the 'Contractor' (as appropriate).

7. RETAINING YOUR INFORMATION

We will only ever actively use your information for as long as you're using Pathways CIC's services. We will archive your information in line with Commissioner/contractor requirements. For example, where we are contracted by the NHS this will be for a period of 7 years following your discharge from our services. Your records will be archived on Pathways CIC's secure systems and then destroyed thereafter in accordance with Pathways CIC's retention policy (available at request). We will only ever archive your personal information for legitimate business reasons. You have a right to 'opt out' of us archiving your personal information thereafter being discharged from Pathways CIC's services. In such instances, please write to darren.appleby@pathwayscic.co.uk.

Pathways CIC will however store safeguarding case information indefinitely.

8. COMMUNICATIONS – SURVEYS

We regularly carry out surveys using a third-party provider such as Microsoft Teams / Google Forms. These surveys will be shared via SMS or email.

We will always ask your consent when completing a survey, whilst we will send you the survey, you have a right to decline completion. We will use the contact number or email address you have provided us with to share the surveys with you. You will be asked, as part of the survey to share your name, you again have a right to opt out and leave the questionnaire anonymised. If you do share your name as part of the survey, a member of the

Pathways CIC team may contact you in the future to gather further feedback on our services. Please refer to Survey Monkey's Privacy Notice for further information.

9. THIRD PARTY PROVIDERS – We may use digital technologies providers in limited circumstances. These third parties may process your information and in these cases the Pathways CIC privacy policy does not apply. These businesses will have their own privacy policy available. In some cases, some of these businesses may store the data collected outside of the EU.

10. YOUR RIGHTS OF ACCESS AND FINDING OUT WHAT INFORMATION PATHWAYS CIC HOLDS ABOUT YOU

As well as the right to access the personal information we hold about you, you have a number of other rights in respect of your personal information under Data Protection Law. These may include (as relevant):

- the right to access or obtain copies of your personal information that we hold
- the right to rectification, including to require us to correct inaccurate personal data;
- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request the erasure of your personal data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain personal data in a commonly used machine-readable format in certain circumstances such as where our processing of it is based on your consent;
- the right to object to automated decision-making including profiling (if any) that has a legal or significant effect on you as an individual; and
- where you have an option to provide us with your personal data or not in connection with your use of our website or in connection with any of our products or services, you have the right to be informed about the possible consequences of not giving it to us;
- the right to withdraw your consent to any processing for which you have previously given that consent

This right is subject to certain exemptions which are set out within the Act.

If you would like to make an Access Request, please contact Pathways CIC's Compliance Officer:

Darren Appleby
86-88 Timbrell Avenue,
Crewe, Cheshire
CW1 3LY

It is encouraged that all Access Requests are made in writing to the address given above. Prior to releasing information about you, we will need to be able to verify your identity and may therefore ask that you provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source, location and timeframe of the information you are requesting.

10.1 Fees

We will not charge for this. However, we will charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive. We will also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.

10.2 Timescales

We aim to comply with the request for access to personal information as quickly as possible. In most cases, we will be able to provide a copy of the information within one month of receipt of your written request. In order to do this, we may ask you to provide additional details about the source, location and timeframe of the information you are requesting.

We may on occasions, extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

10.3 Manifestly unfounded or excessive requests

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- Charge the reasonable fee taking into consideration the administrative costs of providing the information; or
- Refuse to respond - if we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to the judicial remedy without undue delay and at the latest within one month.

10.4 Requests for large amounts of data

If your request requires us to process a large quantity of information, we will ask you to specify the information the request relates to.

10.5 Rights and freedom of others

The right to obtain a copy of information or to access personal information should not adversely affect the right and freedoms of others. If by providing the information requested, we would have to disclose information relating to or identifying a third party we will only do so provided the third party gives consent, otherwise we may edit the data to remove the identity of the third party.

Unless we are under a legal obligation to release data, or the individual has given us permission, personal information will only be released to the individual whom it relates. The disclosure of such information to anyone else without their consent may be a criminal offence.

APPENDIX 1 – COOKIES, THE TYPES WE USE AND HOW YOU CAN DISABLE THEM

In this section you will find information on what cookies may be set when you visit www.pathwayscic.co.uk and how to manage them.

What are cookies?

A cookie is a piece of text that a website transfers to your computer hard disk in order to remember who you are. Cookies interact with your computer and our website faster and easier by remembering data from previous visits. Typically, a cookie will contain the name of the website from which the cookie has come, the lifetime of the cookie and the value. The use of cookies does not give access to the rest of your computer and only the site that created the cookie can read it.

What types of cookies are used?

1. Session cookies – these are temporary cookies that remain in the internet browser's folder of your computer until you close the browser. Our website uses a session cookie which is stored in your browser until you close it to ensure connections to our servers are distributed evenly to provide optimal performance.
2. Persistent/Permanent cookies – these remain in the internet browser's folder of your computer for longer than the time you are visiting this website. We need to use a cookie to remember your refusal of our use of cookies. This cookie does not store any other information and is not used for any other purposes. If you delete your browsing history including cookies you will delete this cookie and will therefore need to readjust your browser setting again.
3. Analytical cookies – Our website uses Google Analytics cookies (third party cookie) for the following purposes:
 - a cookie to record the time of your first visit to website, the time of your most recent visit to the website and the time of your current visit;

- a cookie to record how long you stayed on the website;
 - a cookie to record how you located our website (i.e. Google search, keyword, link from another page etc).
4. Third party cookies - We sometimes allow partners or service providers to use cookies on our websites. These cookies are used to help us understand how a specific promotion or campaign is performing. The information obtained from these cookies is only used by Pathways and its partners. We only share the information obtained through the use of Google Analytics with Google. For more information on Google's use of your information, please visit the Google Privacy and Data Sharing pages.

The cookies we use for these purposes do not track your internet usage after leaving our website and we do not store your personal information. They will also not be used in connection with any other information to identify you in any way.

Can I opt out of cookies?

Pathways CIC will not use cookies to collect personally identifiable information about you. You can restrict or block the cookies which are set by our websites, and you can do so by accessing your Internet browser settings. The 'Help' function within your browser should tell you how. For general information about cookies and how to disable them, please visit: <http://www.aboutcookies.org>

Please be aware that restricting cookies may impact on the functionality of our websites. For information on how to manage cookies on a mobile phone, games console or internet-enabled television, you should refer to the operations manual specific to each device. To opt out of any third parties using cookies where data about your interaction with our website is collected, please refer to their website for this information.

Monitoring and reviewing

This policy is monitored regularly by Pathways CIC's Board and Leadership team and is subject to formal review every 2 years, or where there are changes to legislation or internal governance.

Revision History

Version	Date	Changes	Approved by
1	May 2018	Closed	Y Clarke
1.1	June 2020	Updates to third parties and use of video technology	Y Clarke
1.2	January 2020	Amendment to include DAP 2018 and UK GDPR	V Waghorn
1.3	September 2021	Amendments to contents. Third Party (point 9) missing from previous update.	V Waghorn
1.4	June 2022	Changes to include emails for surveys	M Franklin
1.5	May 2024	Changes to personnel / communication (surveys) and use of third-party providers	Yvonne Clarke
1.5	CLOSED		