

PRRT Privacy Notice

PRRT Privacy notice

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Links and Dependencies
PRRT Records and Information Management Policy
PRRT Data retention and disposal schedule
Access to Health Records (Northern Ireland) Order 1993

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PRRT Privacy notice

Introduction

The Police Rehabilitation and Retraining Trust (PRRT) are committed to safeguarding and preserving the privacy of our visitors and staff.

The Data Protection Officer

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled. To contact the Data Protection Officer at PRRT please phone 028 9042 7788, email dataprotectionofficer@prrt.org or by writing to them at Data Protection Officer, 100 Belfast Road, Holywood, BT18 9QY.

How we use your information

This privacy notice tells you what to expect when the Police Rehabilitation and Retraining Trust (PRRT) collects personal information, how we use it and how you can interact with us about it. It applies to information we collect about each of the below.

- [People who use PRRT Services - Our Clients](#)
- [Sharing Data with Healthcare Providers](#)
- [People who we contract with to help deliver our services](#)
- [Clients who are referred to contract providers](#)
- [How we keep your information safe](#)
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People who use PRRT Services – our clients

PRRT was set up in The Financial Provisions Act (NI) 2014 and The Police Rehabilitation and Retraining Trust Regulations (NI) 2014. These services are detailed under Article 8 of the Regulations, this being the legal basis for offering eligible clients services for Physiotherapy, Psychological Therapies and Personal Development and Training Services.

In the course of delivery for these services, personal data is held in order to carry out the service function. Personal information will either be provided by you or provided by a third party if you are referred from your HR or OHW department. Personal data is held in accordance with the PRRT retention and disposal policy. The data we process is only used for the purposes for which it is originally collected and is not processed for any other purpose that would be incompatible with that original purpose.

PRRT will ask for consent to carry out clinical procedures/practices in regard to your treatment. This will be discussed with you at your initial assessment.

Sharing Data with Healthcare Providers

PRRT shares data with other healthcare providers if this is necessary in the furtherance of treatment/advice.

Personal data in respect of Psychological Therapies clients will be shared with your GP (GDPR Article 9 2(h) which relates to provision of health treatment). In regard to physiotherapy clients GP's may also be sent information in regard to your treatment and progress.

Some clients may work within the Department of Justice and will have been referred to PRRT via your HR department. PRRT agrees in advance with the referring organisation what information will be returned to your HR department at the end of your treatment. Your HR department will receive a report stating how many sessions you attended, if your progress has improved, stayed the same, worsened etc. This report will not provide any detailed medical information. Medical information will not be disclosed to your HR department, but may be disclosed to your Occupational Health Department or to an approved clinician if this has been agreed within the contract for services. If you have any questions in regard to this please speak to your practitioner at PRRT.

During the course of your attendance at PRRT, to assist your treatment, we may occasionally video or record sessions. This will be agreed with you in advance and reasons provided, your explicit consent will be asked for before this takes place. You can decline this option.

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People who we contract with to help deliver our services

PRRT will contract with other organisations this may be to assist PRRT in delivering our core services of Psychological Therapies, Physiotherapy or Personal Development and Training Services.

We may also contract with organisations to provide services to the organisation such as security guarding, printing, phones and other corporate related activity.

All contractors working on site at PRRT and with PRRT clients either on or off site will be security cleared. In addition contractors working with clients will be Access NI checked.

Tenders for our core services

PRRT are very specific about the quality, experience and qualifications individuals require before they can deliver any services to our clients. Detailed specifications of these requirements will be listed in the tender documentation. Any personal information sent to us to meet the requirements of a tender will be used during the tender evaluation process and only for that purpose.

We will not share any of the information you provide to us other than with the evaluation panel. However there may be times when we have to ask for advice from the Central Procurement Department within the Department of Finance. It may be necessary in these circumstances to share information, where possible this is minimised and anonymised. In addition auditors will periodically review the procurement activity of PRRT and may require evidence as back up to why certain suppliers were successful, in this instance some personal information may also have to be disclosed to the auditors. We would aim to keep this to a minimum.

We will not collect more information than we need to fulfil the criteria of the evaluation and will not retain this information for longer than is necessary.

Clients who are referred to contract providers

To make our services available on a regional basis we will contract with outsource providers to deliver a locally based service. We will share personal data relating to you with the outsource provider in order to deliver a service for you. We will share your name, date of birth and a brief overview of your medical condition. This information will be sent via an encrypted email system to the service provider. All transfers of personal information between PRRT and the service provider will be sent this way.

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How we keep your information safe

We protect your information from unauthorised or unlawful processing and against accidental loss, destruction or damage through a series of security measures. We do this through physical, technological and organisational security measures. For instance we have alarmed premises, CCTV, access control to offices, visitors are supervised. We have strong anti-virus systems in use, servers are held in secure rooms and we have in place a disaster recovery plan. When you contact us to access services and to ask about your information, we will ask you to provide us with proof of identity. This is to help protect your information.

How long we keep your information

To meet our legal and regulatory obligations, we hold your information while you are a client and for a specified period of time after that. We do not hold it longer than necessary. PRRT has a detailed policy in regard to data retention. Should you require further information please click on the link [PRRT Retention and Disposal Schedule](#)

Your Rights Explained

Your rights

Under the Data Protection Bill and GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you.

Right to rectification

All clients have the right to obtain without undue delay the rectification of any inaccurate personal data concerning him or her.

Right to erasure (right to be forgotten)

All clients have the right of erasure of personal data without delay where certain conditions are met.

Right of restriction of processing

All clients have the right to restricting the processing of data where certain conditions are met.

Right to lodge a complaint with a supervisory authority

All clients have the right to lodge a complaint with the Information Commissioner's Office by post or email.

The Information Commissioner's Office – Northern Ireland
3rd Floor
14 Cromac Place,
Belfast
BT7 2JB
Telephone: 028 9027 8757 / 0303 123 1114
Email: ni@ico.org.uk

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Making a complaint

PRRT tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

On occasion expectations may not be met and in the event that you as a client are not satisfied with the level of service provided, or indeed any other aspect of service delivery, you have the right to voice your opinion by making a complaint.

The complaint may be made either in person (face to face or over the telephone) or in writing. When we receive a complaint from a person we open a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics on the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

If you want to make a complaint about the way we have processed your personal information, you will find information on how to do this at this link;

<https://www.prrt.org/complaints/>

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Requests for personal information – Client Notes Request

PRRT makes a copy of their notes available to all clients on request. This is not the same as a Subject Access Request (SAR) and relates solely to dealing with the services to which they have attended at PRRT and for which the request for notes relates to. Sometimes clients will request this information if they are dealing with third parties such as solicitors, medical professionals etc. There is no charge for a copy of client notes.

To make a request to PRRT for any personal information you will need to complete a Client Notes Request form which you can obtain by request via email to servicesadmin@prrt.org or by writing to the address below.

Services Administration
PRRT
100 Belfast Road
Holywood
BT18 9QY

PRRT will make every effort to ensure that any personal information requested by a client is given to the client or their approved representative. PRRT may request some form of identification in these circumstances.

Requests for personal information –Subject Access Request (SAR)

PRRT tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to PRRT for any personal information you will need to complete a Subject Access Request form which you can obtain by request via email to servicesadmin@prrt.org or by writing to the address above.

PRRT will make every effort to ensure that any personal information requested by a client is given to the client or their approved representative. PRRT may request some form of identification in these circumstances.

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Requests for personal information – Deceased Clients Notes Request

The Access to Health Records (Northern Ireland) Order 1993 allows access to:

- the deceased's personal representatives (both executors or administrators) to enable them to carry out their duties
- anyone who has a claim resulting from the death

This Order has been repealed to the extent that it now only affects the health records of deceased patients. It applies only to records created since 30 May 1994.

It should be noted that, the Order does not grant a general right of access, it is a restricted right and the following circumstances could limit the applicant's access:

- if there is evidence that the deceased did not wish for any or part of their information to be disclosed
- if disclosure of the information would cause serious harm to the physical or mental health of any person
- if disclosure would identify a third party (that is, not the patient nor a healthcare professional) who has not consented to that disclosure

PRRT may require a medical professional to screen the notes before release.

If the record was made during the 40 days preceding the application for the information, access will be given within 21 days of the request.

Where the record concerns information which was recorded more than 40 days before the application, access will be given within 40 days.

No fee will be charged for providing access to the information.

Please refer to the PRRT Retention and Disposal Schedule for information on the storage, security and destruction of the records of deceased clients.

To make a request to PRRT for copies of a deceased client's notes and records you will need to complete an Access to Deceased Client's Information Form which you can obtain by request via email to servicesadmin@prrt.org or by writing to the address above.

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Visitors to our websites

When someone visits www.prrt.org we use third party services from Google Analytics to collect basic internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. We do not make, and do not allow Google any attempt to find out the identities of those visiting our website. In this case this information is only processed in a way which does not identify anyone. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Social Media rich experience

PRRT use interactive tools provided by Facebook and Twitter to link the latest feeds from our social media pages to our website at www.prrt.org. Although we do not collect information that may identify visitors to our site the Facebook and Twitter feeds may bring forward live comments and tweets from our Social Media pages and these may appear on our site. It is therefore important to consider that any comments posted to our pages on these Social Media platforms may appear on our website as a result until a newer comment is posted on either Social Media platform.

Use of cookies by the PRRT

PRRT do not make use of cookies on our website.

Security and performance

PRRT uses a third party service to help maintain the security and performance of the PRRT website. To deliver this service it processes the IP addresses of visitors to the PRRT website.

People who contact us via social media

If you send us a private or direct message via social media the message will be stored by the Social Media platform used to post the message. We may receive a notification to advise that a message has been left on the platform. We will in turn review the message on the Social Media platform and respond accordingly. We will remove any private messages left on these platforms as soon as they have been addressed. Publicly displayed messages may remain on the platform in line with the controls in place by the Social Media provider unless we have been requested to remove or feel that they should be removed. It is important to familiarise yourself with the privacy policies of the Social Media parties as they may have their own policies that apply to messages left on their platforms for which unfortunately we have limited control.

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E mails

We use TLS (Transport Layer Security) encryption to protect email that we receive. If your email service does not support TLS, you should be aware that any emails that are sent or received between you and us may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law and must not contain malicious content.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

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The use of CCTV cameras on site

PRRT use external CCTV cameras on site to protect the health and safety of Trust staff and visitors in line with the Information Commissioners code of practice. All personal data obtained by virtue of the system, are processed fairly and lawfully and, in particular, are only processed in the exercise of the CCTV system. In processing personal data, there is total respect for everyone's right to privacy.

The storage and security of data will be strictly in accordance with the requirements of Data Protection legislation and PRRT's Data Protection Policy.

CCTV images are held for one week.

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Job applicants, (current and former PRRT employees)

PRRT is the data controller for the information you provide during the recruitment process unless otherwise stated. If you have any queries about the process please contact us at recruitment@prrt.org

What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Application stage

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment and equality monitoring team, including hiring managers, in a way which can identify you. Any information you do provide will be used only to produce and monitor equal opportunities statistics.

Shortlisting

Our hiring managers and supervisors shortlist applications for interview. The applications are anonymised so that they will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

Assessments

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by the PRRT.

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If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of one year. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- We will provide your email address to the Corporate Services Department who will contact you to complete an application for a Counter Terrorist Check (CTC) via PSNI. You may also be asked to complete an Access NI check depending on your role.
- We will contact your referees, using the details you provide in your application, directly to obtain references

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Pension details – we offer a pension scheme; we would ask you to complete a declaration that allows us to share your information in regard to this. The information that is shared is clearly stated on the form.
- Private Healthcare – we offer private health insurance; we would ask you to complete a declaration that allows us to share your information in regard to this. The information that is shared is clearly stated on the form.
- Death in Service – we offer death in service for all employees; we ask you to complete a declaration that allows us to share your information in regard to this. The information that is shared is clearly stated on the form.
- Post start date

All staff are required to declare if they have any potential conflicts of interest. The completed declaration will be held on your personnel file.

How we make decisions about recruitment?

Final recruitment decisions are made on a merit basis by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

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You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing recruitment@prrt.org

During your employment

As your employer PRRT needs to keep and process information about you for normal employment purposes. The information that we hold will be used for our management and administrative use only. Most of the information we hold will have been provided to us by you but some may come from other internal sources such as your manager, or in some cases, external sources, such as referees.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Monitoring of Employees

Monitoring is an important tool to ensure the confidentiality and integrity of PRRT's information. It is carried out within legislative requirements and associated guidance. PRRT seeks to balance employee rights to privacy and personal data protection against its duty to ensure you can work in a safe environment and do not engage in practices that would abuse your conditions of employment.

The PRRT may, if required, undertake the routine monitoring of the content of all electronic communications. These are broadly telephone calls, emails and internet access. In some circumstances, misuse of these may constitute not only a disciplinary offence but also a criminal one. The PRRT will fully co-operate with law enforcement authorities to identify and take action against any member of staff accessing, possessing or disseminating such material. You shall be entitled under Data Protection Legislation to access information gathered on your activities, unless it affects a serious criminal investigation or national security.

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Retention and Destruction of Records

PRRT has a comprehensive schedule on the retention and disposal of records. Please click [here](#) to read this in detail.

[PRRT Retention and Disposal Schedule](#)

Changes to this privacy notice

We keep our privacy notice under regular review and will update this formally on 15th May 2019. This privacy notice was last updated on 8th October 2018.

How to contact us

If you want to request information about our privacy policy you can email us or write to:

dataprotectionofficer@prrt.org

Data Protection Officer
PRRT
100 Belfast Road
Holywood
BT18 9QY