Privacy Notice (Full)

Spectrum People General Privacy Notice

Registered name: Spectrum People, charity number 1152437

We are the controller of your personal data. This privacy notice tells you what to expect us to do with your personal information. A simple version is available online: https://spectrumpeople.org.uk/privacy-policy-2/

Contact details

Post: Spectrum People One Navigation Walk, Hebble Wharfe, Wakefield WF1 5RH

Telephone: 01924 311400 Email: spectrumpeople@spectrum-cic.nhs.uk

If your question is about how we use your information, please ask for our Data Protection Lead.

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third-party referrals**:

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Next of kin details
- Photographs or video recordings
- Service use history
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Information about lifestyle, interests or personal history
- Records of meetings and decisions
- Payment details (including card or bank information for transfers and direct debits)
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery and third-party referrals.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Health information
- Sexual orientation information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Recorded images, such as photos or videos

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Health and safety information
- Safeguarding information

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Witness statements and contact details
- Information relating to health and safety (including incident investigation details and reports and accident book records)

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website. Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **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. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

1. Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to provide services and goods, including delivery and third party referrals:
    - We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

2. Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

  Our legitimate interests are: we need to raise funds to continue running our charity.

3. Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

  Our legitimate interests are: so that we can publish quotations and case studies from supporters and partners who have agreed to share them

4. Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

  Our legitimate interests are: in order that we can comply with Health and Safety requirements eg incident reporting

5. Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

  Our legitimate interests are: to ensure that we can contact an applicant

6. Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

  Our legitimate interests are: to ensure we can contact a complainant

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our conditions for using special category information

Some information is treated as more sensitive by law. For us that means information about your health, your racial or ethnic origin, and your sexual orientation.

To use information like this, we need two things. We need a lawful basis, which is set out above. We also need an additional condition. The conditions we rely on are:

To provide support - Article 9(2)(h), health or social care. This lets organisations providing health or social care use health information, where staff work under a duty of confidentiality. (Data Protection Act 2018, Schedule 1, Part 1, paragraph 2.)

To keep people safe - Article 9(2)(g), substantial public interest, using the safeguarding condition. This lets us use and share sensitive information to protect children and adults at risk from harm or neglect. (Schedule 1, Part 2, paragraph 18.)

In an emergency - Article 9(2)(c), vital interests. This applies when someone's life or safety is at immediate risk and they cannot give permission themselves.

To check we are reaching people fairly - Article 9(2)(g), substantial public interest, using the equality of opportunity condition. This lets us use information about ethnicity, health and sexual orientation to monitor whether our services reach people fairly. You can ask us to stop using your information for this. (Schedule 1, Part 2, paragraph 8.)

For photographs, quotes and stories - Article 9(2)(a), explicit consent. Where an image or story tells people something about your health, we rely on your clear permission.

Where we get personal information from

- Directly from you
- Regulatory authorities
- Family members or carers
- Schools, colleges, universities or other education organisations

How long we keep information

We keep your information while you are getting support from us.

After your last contact with us, we keep it for a set time. How long depends on the type of record.

We follow the national rules for health and care records. These set a different time for each type of record. Records about your health and care are kept the longest. Records about things like event sign-ups are kept for a short time.

When the time is up, we either destroy the record safely, or we take out everything that identifies you. Ask us if you want to know how long we will keep your record.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors:

- Charitylog (Dizions) - Our CRM provider
- Spectrum Community Health CIC - Provides HR/payroll/IT, either directly or through their contracted provider

Others we share personal information with

- Charities and voluntary organisations
- Organisations we need to share information with for safeguarding reasons
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media

There are times when we may share information without asking you first. These are:

If a court orders us to.

If the police need it to prevent or detect a crime.

If a child or an adult at risk needs protecting.

If someone's health or safety is at risk, for example an illness that spreads.

If the law requires it, or we have to carry out a duty set down in law.

Apart from these situations, we will not share information about your health without your permission. If you ask us not to share, we will write your choice in your record so that every worker knows. You can change your mind at any time. Sometimes we cannot do what you ask, because the law requires us to share or because someone could be harmed. If that happens, we will explain why.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us, or the ICO:

Email: spectrumpeople@spectrum-cic.nhs.uk

Telephone: 01924 311400

Post: Spectrum People, One Navigation Walk, Hebble Wharf, Wakefield WF1 5RH

We will let you know that we have received your complaint within 30 days. We will look into it as quickly as we can, keep you updated, and tell you what we have decided.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire SK9 5AF

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint

Keeping your information safe

We take our duty to protect your information seriously and take all reasonable steps to keep it safe. This includes making sure the right security is in place and controlling who can see your information. Paper records are stored in locked cabinets.

If something goes wrong and your information is put at risk, we will tell you as soon as we can where there is a high risk to you. We will also report it to the Information Commissioner's Office within 72 hours of becoming aware of it.

Decisions made by computer

We do not make decisions about you using computers alone. A person always makes the decision.

Sending information outside the UK

We keep your information in the UK wherever we can.

Some of the companies we work with are based outside the UK, or store information there. This applies to social media platforms, and to one of the donation websites we use.

When information goes outside the UK, we check that it is still protected to the same standard. The companies we use are covered by an agreement between the UK and the United States which the UK government has approved.

If you would like to know more about this, please ask us.

Photographs, film, quotes and stories

We sometimes take photographs or short films at our events. We also share quotes, stories and case studies about our work. These may appear on our website, on social media, in our reports, or in funding applications.

We will always ask you first, and we will only use them if you say yes.

Saying no will not change the support you get.

You can change your mind later. Just tell us. We will take it down, although we cannot always remove something from a printed report that has already gone out.

If you are a next of kin or an emergency contact

Someone we support may have given us your name and contact details, so that we can reach you in an emergency.

If they have, we hold only what we need, and we use it only to contact you if something happens. We do not use it for anything else.

If you would like to know more, or you would rather we did not hold your details, please contact us using the details at the top of this notice.

Getting this in another format

If you would like this notice in large print, in easy read, in another language, or read aloud, please ask us. We are happy to help.

Changes to this notice

We check this notice at least once a year. If we want to use your information for something new, we will tell you before we start.

Version 10 August 2026.
Next review due August 2027.