



**Cambridgeshire and
Peterborough**
NHS Foundation Trust

Recovery College East

PRIVACY POLICY

(May 2018)

Introduction

At Recovery College East we understand that the privacy and security of your personal information is an important issue to you and we are committed to protecting it. We aim to be completely transparent on how we collect, use and store your personal information (this means any information that identifies or could identify you). This privacy policy also outlines your related privacy rights.

The processing of your information is carried out by or on behalf of Cambridgeshire and Peterborough NHS Foundation Trust (CPFT) and is used for the purposes of legitimate interest only – i.e. to carry out the necessary functions required to run the college and to keep our students informed of activities within the college.

Please take the time to read this policy carefully. If you have any questions about this policy, or would like to update your communication preferences, please contact the college using any of the methods below:

Cambridge:

By post: Recovery College East, 128-130 Tenison Road, Cambridge CB1 2DP

By phone: 01223 227510

By email: recoverycollegeeast@cpft.nhs.uk

Peterborough:

By post: Recovery College East, Gloucester Centre, Morpeth Close, Peterborough PE2 7JU

By phone: 01733 746660 or 01733 746662

By email: recoverycollegeeast@cpft.nhs.uk

Privacy Policy

Our Privacy Policy outlines:

- 1. Who we are**
- 2. How we collect information about you**
- 3. What information we collect and why we use it**
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- 5. Marketing**
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1. Who we are

Recovery College East provides a collaborative, educational learning environment and aims to convey messages of hope, empowerment and opportunity to all. It celebrates strengths and successes rather than highlighting deficits or problems.

Here at Recovery College East, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

Cambridgeshire and Peterborough NHS Foundation Trust (CPFT) are a "data controller" for the purposes of the General Data Protection Regulation and Data Protection Act 2018. This means that they are responsible for, and control the processing of, your personal information. Recovery College East has a duty to comply with the general privacy practises as specified by CPFT.

For further information about CPFT's privacy practices, please contact our Information Governance department:

By post: Elizabeth House, Fulbourn Hospital, Cambridge Road,
Cambridge CB21 5EF

By phone: 01223 219400

By email: information.governance@cpft.nhs.uk

2. How we collect information about you

Everything we do at the college is done to ensure that we can help people progress in their recovery journey towards a more meaningful and satisfying life. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website, receiving emails, or via the post or phone calls. We want to make sure that you receive the best support during your time as a student with us.

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities, register with us as a student or otherwise provide us with your personal information. This includes when you phone us, email us, get in touch via the post, or visit us in person.

When you visit our website: CPFT gathers general information which might include which pages you visit most often and which services, events or information is of most interest to you. Wherever possible CPFT uses anonymous information which does not identify individual visitors to our website.

3. What information we collect and why we use it

Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address and telephone number as well as any other information you provide in any communications between us. You will have given us this information when registering with the college to attend our courses.

We will mainly use this information:

- To provide the services that you have requested.
- To update you with important administrative messages about your attendance at the college, any changes to scheduled courses and provide you with information about future registration days at the college.
- To keep a record of your attendance on courses at the college which enables us to identify how courses are being attended and determine the best courses to offer students in future terms.
- To evaluate our courses and identify areas for improvement. Any comments you include on our evaluation forms may also be used to help promote the college and will be used anonymously. You can choose whether you are willing to allow us to share your comments when you complete an evaluation form.

Sensitive Personal Information

If you provide us with any Sensitive Personal Information, either during course sessions, by telephone, by email or by other means, we will treat that information with extra care and confidentiality and always in accordance with our Privacy Policy.

You can choose whether you want to remain completely anonymous or are happy to share your personal details with staff members and we will always ask for your permission regarding whether you would be willing to share your story with the media, or other parties, as part of our work promoting people's personal recovery stories (for example, in our Speak Your Mind magazine).

A special note about the Sensitive Personal Information we hold

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

Our registration form asks for some Sensitive Personal Information, which you are not obliged to provide. However such information can help us to provide you with support for any special requirements you may have, such as access to the premises, provision of handouts in a suitable format and general support whilst you are with us. If you contact us in other more general communications, such as by phone or email, you may choose to disclose details of a sensitive nature.

We will only use this information:

For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.

We will never pass on your details to anyone else without your express permission except in exceptional circumstances. An example of this might be someone reporting a serious risk of harm, either to themselves or others, such as physical abuse or exploitation.

4. The legal basis for using your information

In general, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (for example, because you

have registered with the college to attend courses or you have asked to receive information about future registration days and activities at the college).

However, there are other lawful reasons that allow us to process your personal information and one of those is called '**legitimate interests**'. Recovery College East has a 'legitimate interest' in processing your information to help us to achieve our vision of ensuring that everyone attending the college is treated in a positive, safe and respectful way.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and we will not process your personal information if we feel that there is an imbalance.

5. Marketing

We will only contact you about the recovery college and its activities if you have given us your permission for us to contact you. We will always ask you about your preferred method of communication and adhere to this method wherever possible.

If, at any time, you no longer wish to be contacted by the college or would like to update your preferred method of communication, please inform a member of the college team who will ensure that your preferences are updated.

We occasionally have requests from other organisations to distribute information about their own activities/events where these might be of particular interest to our students. We will only send you such information if you have specifically consented to this when registering with the college. Again, you can update your preference for this at any time.

6. Sharing your Information

The personal information we collect about you will only be used by staff and volunteers at Recovery College East so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor would we ever sell any information about your web browsing activity.

Legal disclosure

We may disclose your information if required to do so by law (to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority) for example in the interests of safeguarding and the protection of yourself and/or others from serious harm.

7. Keeping your information safe

We take looking after your information very seriously. We have implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information via the internet/email is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

8. How long we hold your information for

We will only keep your information for as long as is reasonable and necessary, which may be to fulfil statutory obligations, relating to the period of time with which you are engaged in activities and courses at the recovery college. However, if you decide to leave the college you can ask us to remove your personal information from our records.

9. Your rights

If you wish to exercise any of your rights, or make a complaint, you can do so by contacting our Information Governance team at CPFT - see Section 1 of this policy for their contact information. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office:

You have various rights in respect of the personal information we hold about you which are set out in more detail below.

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

By phone: 0303 123 1113

Via their website: <https://ico.org.uk/>

Access to your personal information: You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.

Right to object: You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

Consent: If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.

Rectification: You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure: You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction: You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

10. Monitoring

EQUAL OPPORTUNITIES INFORMATION

Information about Equal Opportunities which has been anonymously provided by you, and with your consent, will be used purely for the purposes of monitoring our compliance with equal opportunities relating to student attendance at the college. This information is recorded electronically and the original paper document is then immediately shredded as confidential waste.