



## **New Horizons Privacy Notice**

### **Introduction**

This notice will tell you more about the personal information (or personal data) that we collect on the New Horizons project, how we store it and who can see it. Broadly, personal information (or personal data) is any information that can identify you as an individual. We process many different types of personal information, for example your name, address and date of birth.

We may also process 'special categories' of personal information (for example, information relating to your health, religion or ethnicity) If you do provide us with documents that contain, or otherwise volunteer to us, data that constitutes a special category of personal information, then you will be regarded as giving your explicit consent to us processing that data as described in this privacy notice. We will always seek to confirm with you that this is the case. Note that we process this information so that we can treat you fairly and according to your needs.

If you have any questions about how we process your data, you can contact our Project Manager at [lynne.mcaulay@chsgroup.org.uk](mailto:lynne.mcaulay@chsgroup.org.uk)

### **The New Horizons partnership**

Your coach works for one of the following organisations:

- Axiom Academy, part of the Longhurst Group
- Broadland Housing Group
- Centre 33
- CHS Group
- Citizens Advice Rural Cambridgeshire
- Cross Keys Homes
- Norfolk CAB
- Papworth Trust

The University of Cambridge is also a partner on New Horizons and has access to your personal data.

CHS Group is the lead partner on New Horizons and has additional responsibilities for how your data is managed.

Each organisation will manage your data in line with this data notice. If they use the data collected from you during your time with New Horizons for any purpose other than the project, such as by storing it on their own internal database, they will have a separate Privacy Notice that they will show you.

Each of these organisations are committed to protecting your personal data. This privacy notice sets out how your personal data will be collected and processed in relation to the New Horizons project.

### **Who are the data controllers and data processors on the New Horizons project?**

This project is part of the Building Better Opportunities programme and receives funding from both European Social Funding and the Big Lottery. The majority of the data we collect is part of the agreement we have with our funders. The ESF part of the funding is managed by the Department for Work and Pensions ESF Managing Authority (the MA). This means that they are the 'data controller' for most of the data that we collect. Until you are enrolled CHS Group, as the lead partner, is the data controller for the data collected on our referral form, our triage form and our self-evaluation tool (The 'MOW'). The New Horizons teams in the organisations listed above are data processors for the data collected on this project.

The MA is the data controller for the majority of your data that we collect and store on New Horizons. For more information please see their Privacy Notice here:

<https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>

### **How do we collect your data?**

You might refer yourself into the project or an organisation who is working with you might refer you. When an organisation refers you they should get permission from you to do this. We are not responsible for external organisations referring you without your permission and ask that organisations collect a signature from you to show us that you have given your permission.

When you meet with a coach, they will collect data from you to ensure that New Horizons is an appropriate service for you. What we then do with the data we have collected will depend on if you enrol on the service or not.

### **What data do we collect?**

We are data controllers for the following data.

On our referral form we collect your name, contact details and a reason for the referral. When you are enrolled this form will become part of the evidence for your eligibility and we will become the data processor for it at this point.

On our triage form, where we discuss if the New Horizons service is appropriate for you, we collect your age, gender, ethnicity, employment status and any access requirements. When you are enrolled this form will become part of the evidence for your eligibility and the MA becomes the data controller for this data.

On our Money Online Work self-evaluation tool we collect a numerical score of how well you feel you are doing in 9 different areas. We also take a written narrative to explain these scores. If you enrol on the project, the MA becomes the data controller for this data.

### **Why do we process your personal data?**

The data we collect as data controller is to ensure that New Horizons is the most appropriate project for you to be on. This is the data that we collect before you are enrolled on the project. If we think your needs are better met by another organisation we will give you their contact details. We will only pass on your details to them if you tell us that we can.

All other data is collected as it has been requested that we do so by the MA for the project. We are the data processor for the data we collect from you while we are enrolling you on the project and while you are on the project. We have an agreement with the Big Lottery who are acting as an intermediary for the MA. If we do not collect or retain your data during your time on the project, we will be in breach of our agreement. This means that the data processing is necessary for our legitimate interests; this is the lawful basis for us to process personal data.

To understand why the MA asks us to collect, process and retain your data, please see their Privacy Notice here: <https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>

### **What do we do with your data if you do not enrol on the project?**

If you do not enrol on the project for any reason, we will keep hard copies of your referral form and the triage form and we will keep your details on our database. We will keep this as we will use the data on it to analyse statistical information about who is referred in and who is subsequently enrolled. This shows us if there are any patterns, for example if a larger proportion of referred men than women enrol on the project. However, as we are the data controller for this data we will destroy it if you ask us to.

We will destroy hard copies of your Money Online Work tool and will only keep the numerical scores on our database. We are the data controller for this data and can therefore also delete the database version, if you ask us to.

However, if you are enrolled on the project we become the data processor for this data and therefore must keep it.

### **Who can see your data within our partnership?**

Having received your referral form, any member of the New Horizons team might contact you. The details from your referral form will be kept on our database and hard copies of the

referral form stored securely by the organisation who received the referral and the organisation working with you, if this is different.

As well as your coach, a limited number of other staff at your host organisation may see your paper file, as they need to check the files for compliance to guidance from our MA. CHS staff may see your file for the same reason. When you have finished working with your coach, your paperwork will be sent to CHS Group who will ensure that it is stored safely.

In addition, our evaluator the University of Cambridge may see your paper file or details we have on our database. They will only contact you directly with prior discussion from your coach.

### **Who might we share your data with outside the partnership?**

Both the MA and the Big Lottery can see personal data about you, as they are the data controller for much of the data we collect. They can also ask to see your paper file or information held about you on our database. You may be contacted to discuss your involvement in the project by the MA or their evaluator.

For further information you should refer to this Privacy Notice at <https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>

We will never share your data with any other organisation without your explicit consent.

### **How do we protect your data?**

We take data security very seriously. CHS and all of our partner organisations have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Your data is held securely in electronic and/or manual records. All of our staff receive data protection training and are made aware of how data should be handled and stored in accordance with data protection legislation. Where appropriate, IT systems have restricted access arrangements in place to ensure that only authorised staff have access to your data.

### **How long do we keep your data?**

We will keep all data until the end of the project, currently September 2019. If you have enrolled on the project and therefore we are data processors for your data, we cannot destroy it at this time. Our funders have told us that we need to keep your data until we are given permission to destroy it. This is likely to be after 2026. CHS are responsible for ensuring that all data is stored securely until it is destroyed.

### **What are your rights?**

Even if we already hold your personal data, you still have various rights under data protection legislation. We will seek to deal with your request without undue delay and in accordance with any legislative requirements. We may keep a record of your communication to help us resolve any issues or requests that you raise.

- Right to object – if we are using data because we deem it necessary for our legitimate reasons to do so and you do not agree, you have the right to object. You also have the right to object to being subject to automated decision making, including profiling and direct marketing.
- Right to withdraw consent – where we have obtained your consent to process personal data for certain activities (including marketing), you may withdraw your consent and request that your personal data be deleted at any time.
- Right to access (subject access request) – you have the right to ask us to confirm what information we hold about you at any time and may ask us to modify or update such information. We may ask you to verify your identity, provide more information and/or where legally permitted decline your request and explain why.
- Right to erasure – in the following circumstances, you have the right to request that your personal data be erased: if the data is no longer necessary for the original purposes it was collected or processed, it has been processed unlawfully, it should be deleted due to a legal obligation or you object to processing and there is no overriding legitimate interest for us to continue processing. We may only decline your request if certain limited conditions apply.
- Right to portability – you have the right to ask us to transfer your data to another data controller or to yourself.
- Right to block or restrict processing whilst the organisation considers your requests exercised under data protection legislation.

If you would like to exercise any of these rights, please e-mail [lynne.mcaulay@chsgroup.org.uk](mailto:lynne.mcaulay@chsgroup.org.uk) or write to Lynne McAulay, CHS Group, Community Investment Department, Endurance House, Vision Park, Chivers Way, Histon, Cambridgeshire, CB24 9ZR.

If you are unhappy with the way in which your personal data has been processed you may in the first instance contact our Data Protection Officer at [data.protection@chsgroup.org.uk](mailto:data.protection@chsgroup.org.uk).

If you remain dissatisfied then you have the right to complain directly to the Information Commissioner ([www.ico.org.uk/concerns](http://www.ico.org.uk/concerns))

### **What if you do not provide personal data?**

You will not be able to enrol on the New Horizons project if you cannot provide us with your personal data.

### **Contact details of the Data Controller for New Horizons at CHS**

Lynne McAulay  
 New Horizons Project Manager  
[Lynne.mcaulay@chsgroup.org.uk](mailto:Lynne.mcaulay@chsgroup.org.uk)  
 07590 861337

### **Contact details of the CHS Data Protection Officer**

CHS Group has a Data Protection Officer who can be contacted by e-mailing [data.protection@chsgroup.org.uk](mailto:data.protection@chsgroup.org.uk) or writing to our offices at Endurance House (at the address given above).