

PRIVACY POLICY FOR ASSOCIATED SUPPORTING NETWORK

1. The purpose of this document

We are a 'data controller'. This means that we are responsible for deciding the purposes for which we hold and use personal information about you.

We have received an enquiry or application from a prospective foster parent/carer (referred to as the 'Applicant(s)'). We understand that you are an Associated Support Network with the Applicant(s). This means that you may be:

- A member of that Applicant(s) household or family (referred to as a 'Household/Family Member');
- A support person to that Applicant(s) (referred to as a 'Support Person'); or
- A person who frequently visits the Applicant(s) household (referred to as a 'Person on the Periphery').

You are being sent a copy of this privacy policy because as part of the assessment process for the Applicant(s), we will need to process your personal data. In addition, if the application made by the Applicant(s) is approved, we would need to process your personal data during the course of the fostering relationship. This would be pertinent to assess your suitability to have contact with a child in a fostering placement as you are associated with the Applicant(s) and their household.

This privacy policy makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and subsequently if the Applicant(s) are approved as a foster parent/carer by us, and how long it will usually be retained for.

2. The type of information we hold about you

The type of information we will collect about you will depend on whether you are a Household Member, a Support Person or a Person on the Periphery. We will collect, store, and use various personal information about you as an Associated Support Network, this may include the following information:

- Name, address, date of birth, gender, telephone number and contact details
- Employment information such as past and present employment or occupation and employment details including an employment check
- Information about your personality, standard of living and accommodation
- Information about your marital status and details of current and any previous marriage, civil partnership or similar relationship
- Information about your leisure activities and interests
- Previous experience (if any) of caring for your own and other children
- Skills, competence and potential relevant to your capacity to care effectively for a child placed with you
- Information about previous applications such as the outcome of any request or application to foster or adopt children, including particulars of any previous approval or refusal of approval; the outcome of any request or application for registration as an early years provider or later years provider, including particulars of any previous approval or refusal of approval. This would include details of the organisation to which the application was made as well as a check with the regulator.

- Local authority/trust check
- School/nursery details and school/nursery check if you have a child
- Whether you are previously known to us
- Your relationship to the Applicant(s) and the length of time known.
- The frequency of your visits to the Applicant(s) household, the reason(s) for this, the length of stay and whether overnight stay is involved
- Whether you have left your own child in the care of the Applicant(s) and the frequency of this
- Opinions
- References which may include former partner and birth children references. In such circumstances, we would require the details of former partners and birth children.

Depending on whether you are a Household Member, a Support Person or a Person On The Periphery, we may also collect, store and use "special categories" of more sensitive personal information such as:

- Information about your health which may include details of physical illness or any mental illness or disability or sensory impairment. Details of your health may be supported by a medical report
- If your child is under 18 years of age, whether they have ever been on a child protection register / subject to a child protection plan
- Religious persuasion, and capacity to care for a child from any particular religious persuasion
- Racial origin, cultural and linguistic background and capacity to care for a child from any particular racial origin or cultural or linguistic background
- Information about criminal convictions and offences, including details of any cautions.

We may collect, hold and use additional personal information in the course of the recruitment process.

If the Applicant(s) is approved as a foster parent by us, we may collect, hold and use additional personal information in the course of the fostering relationship.

3. How your personal information is collected

We collect personal information about you from the following sources:

- You
- Depending on whether you are a Household Member, a Support Person or a Person on the Periphery, there may be several background checks. Examples may include employment checks, voluntary agency, and local authority/trust. Depending on the circumstances, there may be other checks and enquiries that we would seek and discuss with you first.
- Information from the Applicant(s).
- Disclosure and Barring Service (DBS)/Disclosure Scotland/Access NI in respect of criminal convictions, with or without the use of an intermediary external government-accredited agency.
- Your former partner and/or birth child.
- Assessor of the application.

4. How we will use information about you

We will use the personal information we collect about you to:

- Assess your suitability to have contact with a child in a fostering placement as you are associated with the Applicant(s) and their household and to review your continued suitability

during the fostering relationship if the Applicant(s) are approved as a foster parent/carer by us.

- Carry out background and reference checks
- Communicate with you during the recruitment process where relevant and subsequently if the Applicant(s) is approved as a foster parent/carer by us.
- Analyse and model data to review and better understand fostering households and families
- Keep records related to our recruitment processes
- Update, consolidate and improve the accuracy of our records throughout the fostering relationship if the Applicant(s) is approved as a foster parent/carer by us.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to approve the Applicant(s) for the role since it would be beneficial to us to recruit and retain a suitable foster parent/carer. As a result, this involves us assessing your suitability as an individual which is associated with the Applicant(s) and their household. It is therefore also in our legitimate interests to determine your suitability to have contact with a child in a fostering placement as you are associated with the Applicant(s) and their household.

5. If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider the Applicant(s) application, we may not be able to process the application successfully. We may also be prevented from complying with our legal obligations.

6. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. How we use personal information

We will use your personal information in order to comply with our legal and regulatory obligations throughout the recruitment process.

We also require your personal information to assess your suitability as a member associated with the Applicant(s) and their household.

In particular, the collection of such personal information about you is necessary for the following reasons:

- To adhere to our obligations under social protection law.
- To establish, exercise or defend any legal claims.
- To provide social care services.

8. Information about criminal convictions

We may collect information about your criminal convictions history during the recruitment process. If the Applicant(s) is approved as a foster parent /carer by us, this check will be repeated periodically during the fostering relationship.

Whether a criminal record check needs to be undertaken would depend on whether you are a Household/Family Member, a Support Person or a Person On The Periphery.

For certain roles, we are legally required to carry out criminal record checks. This entails an enhanced criminal record certificate (which includes suitability information relating to children).

If your role is one where we are not legally required to carry out a criminal record check, we may request you to seek a basic disclosure of your criminal records history. This may be due to your role requiring a high degree of trust and integrity since it could involve contact with a child in a fostering placement.

If a criminal record check is undertaken, DBS/Disclosure Scotland/Access NI will issue you with a certificate. We will be informed when a 'clear' certificate has been issued or when it contains information of offences/cautions. In the instance when a disclosure contains information, you will be required to produce a copy of your certificate to us for examination. We may take a copy of the certificate for the purpose of conducting a risk assessment of the offences/cautions.

We have in place appropriate safeguards to protect your privacy when processing such data.

9. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

10. Data sharing

We will share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so. The third parties with whom we may share your personal information would depend on whether you are a Household Member, a Support Person or a Person On The Periphery. We have outlined below various third parties with whom we may share your personal information:

- Referees as well as any other individuals or organisations with which we need to carry out checks and enquiries. Depending on whether you are a Household Member, a Support Person or a Person On The Periphery, there may be several background checks. Examples include employment checks, voluntary agency, local authority/trust, referees, birth child, former partner and where applicable. Depending on the circumstances, there may be other checks and enquiries. In order to perform these checks and enquiries, the relevant third parties will receive basic details about you in order for us to undertake the requisite checks and obtain the relevant information
- DBS/Disclosure Scotland/Access NI for various reasons including:
 - To obtain the outcome of the check in respect of criminal convictions (both during the recruitment process and at regular intervals during the fostering relationship if the Applicant(s) is approved as a foster parent/carer by us) with or without the use of an intermediary external government-accredited agency
 - To make a referral to DBS/Disclosure Scotland/Access NI due to concerns which we may have about you.
- The Applicant(s)
- Fostering panel and independent assessor
- Other entities in our group for various reasons, including as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.
- Our legal and other professional advisors, including our auditors and insurers

- Subcontractors, partnering organisations or other entities which assist us to provide or improve our services (for example, by analysing and modelling statistics/data)
- Other organisations who provide services to us such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- Other third parties, for example, in the context of the possible sale or restructuring of the business
- Regulators, government bodies, statutory agencies, police, courts or to otherwise comply with legal or regulatory obligations.

11. Arrangements with third party service providers and other entities in the group

All our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

12. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know only. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13. Communications preferences

We may use your home address, telephone numbers, email address and social media or digital channels to communicate with you according to your preferences. You can amend your preferences in respect of such communications, at any time, by contacting us or by following the instructions in each communication from us.

14. Data retention

Unless we notify you otherwise in writing, we will hold your personal information based on the following criteria:

- During the recruitment process and for as long as we have reasonable business needs to deal with your queries (for example, if the application is unsuccessful);
- For as long as someone could bring a claim against us; and
- Retention periods in line with legal and regulatory requirements or guidance.

After this period, we will securely destroy your personal information in accordance with our data retention policy.

15. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process.

16. Consent

Where we are relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

17. Your rights in connection with personal information

We have detailed below a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances and we will explain in writing whether or not they do, at the time you wish to exercise any of these rights.

- The right **to be informed** about the processing of your personal information.
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**.
- The right **to object** to processing of your personal information.
- The right **to restrict processing** of your personal information.
- The right **to have your personal information erased** (the “right to be forgotten”).
- The right to **request access** to your personal information and to obtain information about how we process it.
- The right to **request the transfer of your personal information to another party** (“data portability”).

If you wish to exercise any of these rights, please contact our Data Protection Officer (please see below).

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the supervisory authority for data protection issues in the United Kingdom (www.ico.org.uk) if you have any concerns about how we have processed your information. However we would welcome the opportunity to discuss any issues beforehand with you.

18. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

19. Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact the Data Protection Officer by email to DPO@polariscommunity.co.uk or write to the following address:

Data Protection Officer
Polaris Community
Malvern View
Saxon Business Park
Hanbury Road
Stoke Prior
Bromsgrove
B60 4AD