



PRIVACY NOTICE (updated September 2024)

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WHO WE ARE:

DCC Interactive Limited, known as DCC-i, is a Health and Social Care Consultancy firm. This Privacy notice covers all information provided to and/or stored, processed or by DCC-i.

Our key business functions:

- Professional Training & Continued Professional Development
- Evaluation and Research Projects
- Framework and Policy Development
- Professional Supervision
- Independent Social Work / Health and Social Care Commissions

Our Contact details:

DCC Interactive Ltd (Company No: 13075266)

22 St John Street,

Newport Pagnell

MK16 8HJ

01908 732240

Corporate@DCC-i.co.uk

www.DCC-i.co.uk

Our Data Protection Details:

DCC-i is registered with the Information Commissioners Office. Our registration number is: ZA839281 DCC-i was first registered on 3rd January 2021.

The Data Protection Officer (DPO) to deal with all queries in relation to Data Protection is: Russ Long, Chief Operational & Technical Officer.



PURPOSE OF THIS PRIVACY NOTICE:

This Privacy Notice sets out how any Personal Data provided to DCCi is collected, stored and used, this is referred to as Data Processing. All data processed by DCC-i is undertaken in accordance with the UK General Data Protection Regulations (GDPR) 2019 which come into force on 1st January 2021. You can learn more about your rights under the UK GDPR at: [Individual rights](#) [ICO](#)

Data Definitions

- DCC-I use the GDPR 2018 definitions of Personal Data, Special Category Data and Criminal Offence Data.
- Personal Data is information that include any attributable information such as your name, age, address, contact details or electronic identifiers.
- Special Category Data includes sensitive data such as revealing your health information, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership status.
- Criminal Offence Data contains records and details of your criminal offences.

Our Principles and Promises for processing data

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for specified, explicit and legitimate purposes.
3. Adequate, relevant, limited to what is necessary for the purpose for which it is collected.
4. Accurate and kept up to date.
5. Kept for no longer than is necessary.
6. Kept securely.

Legal basis for data collection and what this means

DCC-i will ensure that we inform you under which legal basis your information is being obtained and processed, usually this will be one of the following reasons:



1. **Consent** – You have expressly consented to us having your data and providing you with a service. This legal basis is usually used for direct marketing purposes. We will also ask for your direct consent to use your information for any other purpose than for which it was originally provided.

You are fully in control of any information that you have provided consent for, you can withdraw your consent at any time and we will no longer use your data and will delete it if requested. If you wish to withdraw your consent, please contact us at corporate@DCC-i.co.uk

2. **Contract** – You have entered, or wish to enter, a contract with us directly, you are giving us data to enable us to provide you with a quote or service according to the contract. We will process as your data as agreed in the terms of the contract that you have entered. If you have any concerns you wish to discuss, please contact us at corporate@DCC-i.co.uk.
3. **Legitimate Interests** – We are providing you with a service, which may be commissioned via a 3rd party (i.e. a training broker, your employer, the department of Health and Social Care) or we are undertaking a legitimate business function, and we need your information to be able to undertake this task properly. *For example: we need delegate information for training courses to send you invites and materials and/or make reasonable adjustments to support you with a learning need you have.*

This is the legal basis for processing data when we need to use your information for a legitimate business purpose and there is no other realistic alternative. To use this basis, we need to be as sure as we can be that we are using your data in a way that you would reasonably expect us to, which will have a minimal impact on your privacy and will not cause you harm. We cannot always offer you the right to erase your information when it has been obtained under this basis. *For example: if we have issued you with a certificate, we are required to keep a record of this for quality assurance purposes.* If you have any concerns you wish to discuss, please contact us at corporate@DCC-i.co.uk.

4. **Legal Obligation and Public Task** – When we undertake Independent Social Work / Health and Social Care Commissions such as MCA/DoLS Assessments, S42 Enquiries, First-tier tribunal reports, Children's Social Care Court Work, Root Cause Analysis Investigations,



SCR's or SAR's – This process is usually governed by the categories of Legal Obligation and/or Public Task. This will mean we are unable to erase any of this information, however we will still consider requests to rectify or restrict the use of your data.

5. ***Vital Interests*** – As an organisation which provides virtual training, you may be accessing training with us from home rather than your place of work. On rare occasions it can be the case that a DCC-i trainer becomes aware of an emergency situation where there is an immediate risk to your life (accident, medical emergency, harm from another person). In order to respond to this eventuality, we ask your employer / the course coordinator to provide DCC-i with the contact details for a person or department that can provide us with your home address in order for it to be passed onto the emergency services, this may be passed on directly or via DCC-i. This circumstance is covered by the legal basis for sharing information defined as 'Vital Interests' which permits any relevant party to share information that is necessary to protect someone's life.

DCC-i will also requests essential information directly from you via an MS TEAMS Form for responding to emergency situations at the beginning of a training session, particularly where the organisation commissioning the service does not have easy access to your data, this information is provided by you with your consent, and would be shared under the legal basis of 'Vital Interests' should it be necessary. This information is deleted at the end of each working day. If you have any concerns you wish to discuss, please contact us at corporate@DCC-i.co.uk. More information about this can be found in our Emergency Procedures Protocol which is available on our website.

6. ***Marketing*** - If we have provided you with specific information in the past, i.e., our in-house training courses, our annual training course catalogue or information on an event or conference, we may use the 'legitimate interests' basis for continuing to send you this information.

As this is a form of marketing, we will always respect your 'right to object' and we will immediately stop contacting you for these purposes. If you have received information of this nature and you wish this to stop, please contact us at: corporate@DCC-i.co.uk



YOUR RIGHTS

Rights of access, rectification, restriction, objection or erasure:

- The right to be informed of what data we collect, how it is used and why.
- The right to access a copy of, or a summary of the data we hold about you.
- The right to rectification, if the data we hold is incorrect.
- The right to erasure of your data (where applicable).
- The right to restrict how we process your data (where applicable).
- The right to data portability (for automated data).
- The right to object to how we process your data (Where applicable).
- Rights in relation to automated decision making and profiling (If carried out).

Data Breaches: If for any reason your data rights have been breached, we will do everything possible to rectify this and minimise the harm caused to you through any data loss or misuse. **Our process for dealing with data breaches can be found in our full Confidentiality and Data Protection Policy.**

You have the right to raise a complaint with the Information Commissioners Office if you do not feel we have adequately responded to your concerns, for more information see: [Make a complaint | ICO](#).

Where the person who we are receiving, using, sharing or processing information about, lacks the capacity to understand the implication of this privacy notice and/or any potential breach or misuse of their data, the privacy notice will be provided to the commissioning organisation to be able to act on that individual's behalf should they have concerns about our use of the data subjects' information and assess such action to be in the individuals best interest.

HOW TO RAISE CONCERNS AND OUR RESPONSE PROMISES:

- Access to your data.
- Rectification of a mistake in the data we hold about you.
- Restriction or Objection to the processing of your data.
- Erasure of your data.



Please contact us at corporate@DCC-i.co.uk

We will:

- Record and acknowledge your request on receipt.
- Ensure the Data Protection Officer is made aware of the request within 3 working days.
- Review your request within 10 Working Days.
- Respond within 1 calendar month if possible.
- If your data request is lengthy or complex we may seek to agree an extension with you, which will be no longer than 2 months.
- If we agree to your request we will provide the information in a clear, accessible manner.
- If we are refusing your request will inform you of the reasons for this and explain how you can complain if you are not satisfied with the response.

Our process for dealing with data requests can be found in our full Confidentiality and Data Protection Policy.

WHAT DATA WE COLLECT, HOW WE STORE, USE AND RETAIN IT.

For direct services, DCC-i will be considered the data controller, for services provided on behalf of a 3rd Party (i.e. Training Broker or Employer) we may be the data processor, with shared or delegated responsibilities for data control.

Personal Data: The most common data we collect is your name, email address, job role, workplace address and phone number so that we can liaise with you regarding the services we provide for you. If you are attending training with us, we may also receive data that you have provided directly or via your employer regarding any physical or learning needs that you have to ensure the trainer can meet your needs. As this information is sensitive, it is routinely deleted from our systems on a rolling 12-month basis. As detailed above, we also ask the organisation commissioning training to be able to give us your address in an emergency, if no central point of contact is available to us to gain your details in an emergency, we will ask you for the detail directly. This information is deleted at the end of each day.



Email Addresses: For some contracts there is the option for you to join the DCC-I MS Teams Platform to gain access to additional resources, your email address is utilised to create a Guest Account, if you stop using the account your address will remain dormant within the system unless you explicitly request for it to be deleted or that area of the platform is deleted.

If you are attending training provided by Calendar Invite – you will be sent the invite to your calendar via your email address, this will however be hidden from other delegates, **however we still advise against the use of personal emails if possible.**

Email addresses enables us to send out invites, reminders and training materials directly to you, we can provide you with updates on additional resources live and after the delivery of the course, we can provide tech support if you are struggling and if you leave the training unexpectedly, we can check on your welfare.

Email Communication: The most common data we retain is email communication. As data should not be kept for longer than it is needed, we ask that employees maintain good housekeeping of their email accounts, including the routine deletion of emails that are no longer required. Email that may relate to matters of finance, complaints, contract disputes, evidence services delivered and/or legal matters can be kept for up to 7 years if required. If contracts have ended the emails will be archived. Contact information will not be used for any other purposes than those they were originally initiated for. You can apply for email communications to be considered for erasure on a case-by-case basis, and routine personal and sensitive data provided for the purposes of training courses is deleted from emails on a rolling 6-monthly basis.

MS Teams Chat: We encourage you to communicate with us through the MS Teams chat functions, if you do so as part of training, no personal information will be downloaded. If you are using the chat function as part of a consultation or project, we will seek permission before downloading any information in the chat, and the project platform will be archived on completion.

Cookies: Our website also routinely gathers basics information through “cookies”. You will be informed of this via the website and the cookie policy.



Research and Evaluations for organisations. Information gathered for research and evaluation processes is anonymised for reporting purposes unless we have express permission to include individual data or examples. Raw data is archived and will not be used for any purpose other than which it was gathered. This information can be considered for deletion on request; however, any data gathered under the criteria of 'legitimate interest' can be retained to evidence the project work completed.

AMHP Dataset Project: DCC-i has been commissioned by Partners in Care & Health / Local Government Association, to work with the AMHP Leads Network (ALN) to undertake a proof-of-concept project – running July 2024 to March 2025. During this time DCC-i will be receiving anonymised data from approximately 50 Local Authority organisations in relation to their Approved Mental Health Professional (AMHP) activity. This data will be anonymised by the submitting LA prior to transfer to DCC-i, however this will include personal and sensitive data relating to individuals referred for a Mental Health Act assessment during a 13-week period. This information will be processed and stored according to DCC-i data protection arrangements, and a full data protection impact assessment (DPIA) has been undertaken to set out the rationale for collection and processing under the category of legitimate interest.

Independent Commissions. Information gathered as part of independent commissions for Organisations or Courts must be retained under the basis of a legal requirement and/or on public interest basis, this information will be archived securely and not used for any purpose other than for which it was intended. Organisations providing information for these purposes are requested to ensure they are following their own GDPR Policy in doing so. Commissioning Organisations can act on behalf of any person that lacks capacity in relation to the use of their data if they have concerns regarding how the information has been gained, stored, used or shared if they assess this to be in the individuals' best interest.

Independent supervision services. Much information is given by 'Consent' therefore is eligible for consideration of erasure, however the data is ultimately recorded under the 'Legitimate Interest' UK GDPR definition (detailed above) as we may need to refuse any request for refusal if it is essential for DCC-i to be able to evidence services provided or actions taken in line with the expectations of Social Work England and the BASW Code of Ethics.



Practice Education/ASYE Assessment and PE Mentoring and Assessment Services.

This service is agreed by contract, however the information will be held under the 'Public Task' UK GDPR definition, as this information relates to the achievement of a professional qualification/completion of an assessed period of employment it may be required in verifying or querying of the relevant award and therefore will be kept indefinitely and is not eligible for deletion. The information will be archived securely once the award and moderation is confirmed.

PROTECTING YOUR DATA

All data stored electronically is protected by the use of a secure cloud system, encryption where appropriate, and a robust IT Policy to ensure staff maintain system security. Physical storage of information is minimal and is kept securely as agreed by a DCC-i Director.

Information in transit is the responsibility of the DCC-i staff member or associate transporting it, information will be kept secure and minimal personal data will be transported to reduce the likelihood of data loss. If we are given your data in error, we will immediately inform the organisation that has provided the information and delete it from all areas of our system.

SAFEGUARDING AND PUBLIC PROTECTION

Occasionally we may be obliged to breach your confidentiality and share information you have given, or information received about you, even if you do not consent. This decision will always be approved by a senior member of staff, and where possible you will be informed. These circumstances are:

- A situation which raises concerns about your safety or that of a child or vulnerable adult.
- As required by Counter Terrorism Legislation of 2006, 2015 or 2019.
- A reportable concern under a professional body (fitness to practice issues).
- As required by the contract in place for the piece of work – we will always make it clear if information you share as part of a contract will be fed-back to the commissioners directly or indirectly.