

WIRED Group Privacy Policy

1. Why we have a privacy policy

New Data Protection Laws came into force on the 25th May 2018. As part of this we have made some changes to our Privacy Statement. The changes reflect the new legal standards and our role and responsibilities to be open, clear and transparent in the way we hold, process and retain your personal and special characteristic information. You will find below our commitments to you but if you would like further information please contact us on the details shown.

2. Who we are and what we do

The Wired Group is a charity and company limited by guarantee with the focus on people and community. The Wired Group incorporates Inclusive Access UK Ltd. We have offices in Wirral, Warrington, Knowsley and Liverpool and have a strong track record of delivering services and training across the North West. Wired Group works to a number of key principles:

- Empowerment
- Choice
- Consultation and planning involvement with disadvantaged people
- Accessible Information
- Local, Regional and National Participation
- Autonomy promoting freedom to make decisions
- Providing high quality training to businesses and the community

Our Vision is to promote the equality, dignity and independence of disadvantaged people. We work with a range of partners to deliver our services. Wired Group incorporating Inclusive Access is registered as a Data Controller under the Data Protection Act.

3. How we collect information about you

We may collect certain information or data about you in various ways. The main circumstances we do so are below.

- If you have registered to receive one or more of the WIRED groups services or products
- If you have completed a web enquiry form directly via any of the WIRED group websites or alternatively via a third party booking or marketing platform; e.g. EventBrite, Survey Monkey, Mail Chimp
- If you have engaged with the WIRED group (WIRED or Inclusive Access) via Facebook, Twitter or LinkedIn
- If you have engaged with us via telephone or email.
- If we have identified through market research within the public domain that you could be a potential recipient of WIRED group services

4. The type of information we may collect about you

If you are registered with one of the WIRED group services, at the point of registration and throughout your engagement with the service we will be collecting and processes a

range of personal and special category data covering your health, wellbeing and support needs and for payroll and managed budget customers your bank account and payee details. If you are a contact that we have connected with via email, LinkedIn, Facebook or Twitter we may collect a limited amount of basic information including your name and email if you have given permission for them to be visible within the public domain.

5. Keeping your personal data safe

We have technical and organisational measures in place to keep your data secure once we receive it. These protective measures may include anonymising and encrypting personal data, firewalls, anti-virus and malware software, holding personal data in secure, confidential storage, and regularly assessing and evaluating the effectiveness of such measures.

6. How we may use your information

6.1 The legal basis for processing your information

The legal basis that we will rely on for processing your data will depend upon the individual circumstances it is being collected and used for and this will be made clear to you at the initial point of service agreement, however, it will be covered under one of the following categories:

- Where you have provided consent to allow us to use your data in a certain way that you have opted into
- Where the processing is necessary to carry out the performance of a contract with you
- Where the processing is necessary in order for us to comply with a legal obligation: or
- Where it is in our legitimate interest to perform our functions, for example, processing donations or raising funds/generating income to deliver our charitable objectives

Please be assured we will never sell, swap or rent out your personal information to other organisations for them to use in their own marketing activities.

We also comply with ensuring children and young people's information has higher levels of security. We ask for parental consent for young people who access our services and are aged under 18 except for services where we are required to offer services to young people without parental consent. However, children aged over 13 are able to request the deletion of their data from our records without parental consent.

6.2 How we will process your information

We will process your information and personal data in the following ways;

- Providing you with information, products or services that you request from us, or to process your booking in relation to an event or course we are organising
- Creating reports and case studies for service monitoring and evaluation purposes using anonymised service user information. We use these reports

internally to help us to continuously improve our services and also externally, supplying them to the local authorities that commission the WIRED group to deliver services. Local authorities and other commissioning organisations that commission the WIRED group to deliver services include Wirral Borough Council (including joint commissioning with Wirral Clinical Commissioning Group), Warrington Borough Council (including joint commissioning with Warrington Clinical Commissioning Group), Liverpool City Council, Liverpool Clinical Commission Group Knowsley Council, Knowsley Clinical Commissioning Group Wirral Health and Wellbeing Community Interest Company, Council for Disabled Children, Contact and Kids and the National Children’s Bureau.

- Sending you communications for information on WIRED group (and other local relevant services) services, newsletters, training, marketing and fundraising activities and volunteering opportunities, keeping electronic and hard copy case notes of the support you have received and digital voice recordings of support provided via telephone. Upon registration with a WIRED Group Service or receiving a communication from us you can choose how you want us to contact you, whether by email, phone, post or text messages (SMS/MMS) and you can update your communication preferences or to stop receiving information at any time by telling us when things change. Please see “keeping us informed” section below. Also, email communications will always offer an opt out option.
- Disclosing your personal/special category personal information when required by law, for example, to HMRC for tax purposes, to police for the prevention or detection of crime, or to other emergency services where it is necessary to safeguard your health and wellbeing. We also safeguard the sharing of this information by using formulised information sharing agreements with organisations where appropriate. Any requests /disclosure for information are only met once it is deemed to be legally compliant.
- Service providers - The Wired Group works with service providers such as software platform providers for example. We work with service providers to help us provide you with high quality services and to operate the running of the charity. We may need to provide limited access to relevant persons within these service provider areas, but we will only allow limited access specific to perform their service for us. Where this is required we will ensure systems are legally compliant. Current WIRED group service providers engaging in supporting the whole WIRED group include Btwo Business Systems, Excel Communications, CMYK print services, Dynamics 365 solutions, Charity Log/Dizons data systems, SAGE accountancy software, Alloj Web Design, Farm Factory Web Design and Cheshire Moving and Archive Storage. Service providers that only support specific areas of the WIRED group are listed in the table below.

Name of Service Provider	WIRED group service that is supported by the service provider and therefor has limited access to data
City & Guilds	Inclusive Access

Appropriately qualified and experienced self-employed Independent SEND mediation service providers	Wirral Mediation Service
Appropriately qualified and experienced self-employed Independent Verification and Assessment Service providers	Inclusive Access
Appropriately qualified and experienced self-employed / volunteer counsellors	Wirral Carers Health & Wellbeing Service Warrington Adult and Young Carers Service
Catalyst web hosting	Inclusive Access
Awareness Software Limited	Warrington Adult and Young Carers Service
Fast SMS text messaging	Wirral Carers Health & Wellbeing Service Warrington Adult and Young Carers Service Wirral Shop Mobility Service Wirral SEND Partnership Liverpool and Knowsley SENDIASS
Mail Chimp email messaging	Inclusive Access Wirral Carers Health & Wellbeing Service Warrington Adult and Young Carers Service Wirral Shop Mobility Service Wirral SEND Partnership Liverpool and Knowsley SENDIASS
Survey Monkey	Inclusive Access Wirral Carers Health & Wellbeing Service Warrington Adult and Young Carers Service Wirral Shop Mobility Service Wirral SEND Partnership Liverpool and Knowsley SENDIASS
IRIS payroll software	WIRED Payroll Service
HMRC	WIRED Payroll Service
NEST (Government Pension Portal)	WIRED Payroll Service
Department for Work and Pensions	WIRED Payroll Service

- Partner Organisations - We also have agreed limited data sharing with some of our partner organisations where there is a contracted basis for the service and this is explained when we sign you up to our specific services. These

organisations are listed in the table below, which also indicates which WIRED Group service the data sharing relates to;

Organisations that we share limited data with;	WIRED service where the data sharing takes place;
AGE UK Wirral (as a director organisation of Wirral Health & Wellbeing CIC)	Wirral Carers Health & Wellbeing Service, Wirral SEND Partnership, Wirral Mediation Service, Wirral Shop Mobility
Wirral Mind (as a director organisation of Wirral Health & Wellbeing CIC)	Wirral Carers Health & Wellbeing Service, Wirral SEND Partnership, Wirral Mediation Service, Wirral Shop Mobility
Health Junction(as a director organisation of Wirral Health & Wellbeing CIC)	Wirral Carers Health & Wellbeing Service, Wirral SEND Partnership, Wirral Mediation Service, Wirral Shop Mobility
Barnardo's (as a director organisation of Wirral Health & Wellbeing CIC)	Wirral Carers Health & Wellbeing Service, Wirral SEND Partnership, Wirral Mediation Service, Wirral Shop Mobility
Wirral Change	Wirral Carers Health & Wellbeing Service
Wirral Mencap	Wirral Carers Health & Wellbeing Service
AGE UK Wirral	Wirral Carers Health & Wellbeing Service
Livewire Warrington	Warrington Adult Carers Leisure Card
Warrington Borough Council	Warrington Adult Carers Service
Wirral Borough Council	Wirral Carers Health & Wellbeing Service
Wirral Health and Wellbeing Community Interest Company	Wirral Carers Health & Wellbeing Service, Wirral SEND Partnership, Wirral Mediation Service, Wirral Shop Mobility
Cheshire Centre for Independent Living	WIRED Managed Budget Service
Cheshire West and Chester Council	WIRED Managed Budget Service
NHS Warrington Clinical Commissioning Group	WIRED Managed Budget Service
NHS Vale Royal Clinical Commissioning Group	WIRED Managed Budget Service
Wirral Clinical Commissioning Group	Wirral Carers Health & Wellbeing Service Wirral PALS service

Wirral Community NHS Foundation Trust	Wirral Carers Health & Wellbeing Service
Liverpool City Council and Liverpool Clinical Commissioning Group	Liverpool and Knowsley SEND IAS Service Liverpool Direct Payments Payroll Service
Knowsley MB Council and Knowsley Clinical Commissioning Group	Liverpool and Knowsley SEND IAS Service
Cheshire and Wirral Partnership NHS Foundation Trust	Wirral Carers Health & Wellbeing Service
Department for Education	Wirral SEND Partnership Liverpool and Knowsley SEND IASS
The Information Advice and Support Services Network	Wirral SEND Partnership Liverpool and Knowsley SEND IASS
Care-lines	Wirral Carers Health & Wellbeing Service (Carers Emergency Contact Card)
Lloyds Bank	WIRED Managed Budget Service Wirral Carers Health and Wellbeing Service (Carers Grant)
Pre-Paid Finance Solutions	Wirral Managed Account and Direct Payments Payroll Service
National Children's Bureau	Wirral, Liverpool and Knowsley Information, Advice and Support Projects (linked to SENDIASS)

7. Keeping us informed when things change

We want to make sure that the personal and special category information we hold on you is accurate and up to date. You can help us to keep our records up to date by telling us when your contact details and other personal information changes.

You can also change your mind at any time about how we contact you or ask us to stop contacting you regarding certain services or altogether, to withdraw consent and for your information to be removed in certain circumstances. Please contact The Wired Group and we will make the changes for you and ensure your information and choices are up to date.

You can do this by:

- **Visiting our Website** - <http://www.wired.me.uk/Contact-Us.asp> You will see a contact us web form, please use the following as the Message subject; Private, FAO Data Protection Lead

- **Telephoning the WIRED Group** - 0151 522 7990 - Please ask for the manager of the WIRED service area that you are receiving support from, or alternatively, email contact@wired.me.uk
- **In writing** - Write to: WIRED, St James Centre, 344 Laird Street, Birkenhead, CH41 7AL
- **For Inclusive Access** – Telephoning Inclusive Access – 0151 653 7111 or emailing – accessIA@inclusiveaccess.co.uk

If you tell us you no longer want us to contact you or you no longer want to access our service, it may take a short time before our communications stop altogether but we will ensure this is done as quickly as possible.

8. Your rights in relation to how we use your data

In data protection law, people have rights over their data. These rights allow you to ask us to do something, or stop doing something, with your personal data. There are eight individual rights.

- **The right of access** means that you can ask us for a copy of the data we have on you. This is also known as a subject access request - or SAR – and we have one month to deal with a SAR.
- **The right to object** means that you can object to specific processing of their personal data, so we'd have to stop using your data for certain purposes unless we have a good reason to continue.
- **The right to be informed** means that we have to tell you that we have your data and what we're doing with it.
- **The right to rectification** means you can ask us to correct your data if it isn't accurate.
- **The right to erasure** means you can ask us to delete your data. It is also known as the 'right to be forgotten' and means that in certain specific situations, we may have to delete your data upon request.
- **The right to restrict processing** means that we have to temporarily stop processing someone's data if you ask us to. We can store your data, but not use it. This isn't an absolute right and only applies in certain circumstances.
- **The right to data portability** gives you more control over your data where it's held electronically if it's personal data you've supplied yourself. It's intended to make it easy for you to provide it to another data controller if you need to. The data we hold about you electronically has to be made easily accessible and transferable. Also, if requested, we have to provide it to you or to another organisation on your behalf. However, this right only applies when the controller is relying on 'consent' or 'performance of a contract', and when we are processing the data by automated means.
- **Rights in relation to automated decision making and profiling.** If personal data is processed entirely by automatic means and this might have a legal or

similarly significant effect on the person, you can request some human involvement in the processing.