



WELLBEING EXETER

PRIVACY POLICY

Wellbeing Exeter is a partnership programme managed by Devon Community Foundation (DCF). DCF is a registered charity (Charity no: 1057923) and a company limited by guarantee registered in England & Wales. (Company No: 03236918) with offices at The Factory, Leat Street, Tiverton, Devon, EX16 5LL.

Wellbeing Exeter is funded by Exeter City Council and the Exeter & Cranbrook Sport England Local Delivery Pilot.

DCF is the sector and programme lead for Wellbeing Exeter who through a range of initiatives provide preventative support to individuals alongside partners from a range of voluntary sector organisations. In this privacy policy we will refer to these organisations as our **Partners**. A full list of our Partners is shown below.

OUR PARTNERS

Name of Partner	Registered Charity Number	Registered Company Number (if relevant)	Registered Company Address	Address for Correspondence	Email Address
CoLab	1100990	4928733	Wat Tyler House, 3 King William Street, Exeter EX4 6PD	Wat Tyler House, 3 King William Street, Exeter EX4 6PD	enquiries@colabexeter.org.uk
Exeter City Community Trust	1121596	N/A	St James Park, Stadium Way, Exeter EX4 6PX	St James Park, Stadium Way, Exeter EX4 6PX	cctadmin@ecfc.co.uk
Exeter Community Initiatives	1026229	2844870	148-149 Fore Street, Exeter EX4 3AN	148-149 Fore Street, Exeter EX4 3AN	info@eci.org.uk

This is a joint Privacy Statement by DCF and the Partners, when we refer to “we” or “us” we mean DCF and the Partners who work together to deliver the **Wellbeing Exeter** programme. Together we jointly determine how and why your personal information is processed. This Privacy Notice is in addition to any privacy notice you may receive from DCF, any of our Partners or our Funders.

THE PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy will inform you as to how we look after your personal information and a copy of this policy will be provided to you when you are introduced to your **Partner Community Connector**. A **Partner Community Connector** will be your primary source of support and main point of contact.

This Privacy Policy sets out your privacy rights and how the law protects you and it is important that you read it carefully to fully understand how and why we are using your personal information.

JOINT CONTROLLERS OF YOUR PERSONAL INFORMATION

Wellbeing Exeter is made up of DCF and the Partners, all of which are different legal entities who act together as joint controllers of your personal information. Whilst many decisions on processing are made by Wellbeing Exeter, your rights covered under this Privacy Policy can be exercised against any entity solely or the parties (DCF and the Partners) jointly.

We have a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

We may make changes to our Privacy Policy from time to time. Changes will be posted on our website: <https://www.wellbeingexeter.org.uk/privacy-policy>. Please check back frequently to see any updates or changes to our Privacy Policy.

CONTACT DETAILS

Our full details are: Wellbeing Exeter, c/o Devon Community Foundation, The Factory, Leat Street, Tiverton, Devon EX16 5LL. Email: info@devoncf.com. Telephone: 01884 235887.

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would welcome the opportunity to address your concerns before you approach the ICO, so where possible please contact us first.

WHAT INFORMATION DO WE COLLECT AND KEEP?

Personal data, or personal information, means any information about you that allows us to identify you. We also collect information about you that is categorised as sensitive or special category data, this could include information about your ethnicity and information concerning your health and wellbeing. In the majority of cases this is information you have provided us with, and we only process this information where you have given us your permission, or your 'consent' to do so. There are limited circumstances where we may rely on our legitimate interest to process your personal information and we have detailed when this might happen below.

Your personal information does not include information where your identity has been removed or where data has been combined or aggregated with other data but does not reveal your identity. We may aggregate your data to evaluate the success of the Wellbeing Exeter programme and more information about this is available below.

Each individual we support will have their own unique record in our database. Your record will hold different kinds of personal information about you, including information about:

Your identity: such as your first name, last name, title, date of birth, gender, ethnicity, employment status and living arrangements.

Your contact information: such as your address, email address, telephone numbers and any other information you have given to us for the purpose of getting in touch with you.

Your healthcare providers: such as the name of your GP, surgery details and any other healthcare providers that support you.

Information about your health and wellbeing: it will also be necessary for us to collect information that relates to the type of help and support we give you, as well as the reasons you have been introduced to a Partner Community Connector and any other information relevant to the support being provided to you. This information is referred to as sensitive or special category data.

Information that you provide in survey responses: occasionally we may link the information you provide in survey responses to your unique record. Our questionnaires may also contain a question on your ethnicity. You are not obligated to provide this information, and this information will only be used in evaluating or assessing the Wellbeing Exeter programme.

Information and contact details about your close family, friends and/or carers: we will keep this information only where you have asked us to. It is important that you make anyone important to you aware that we hold their contact details and the circumstances in which we may contact them.

Information we receive from your GP or other health care provider:

Your NHS Number and a short summary of why you have been referred to Wellbeing Exeter: your NHS number will be provided to us by your GP or healthcare provider. Your GP or healthcare provider may also provide us with a short summary of why you have been referred and what support we can give. This information will be used to ensure we can identify the right partner for you. Your GP will only refer you to the Wellbeing Exeter programme after talking to you first.

Information we create:

Your Unique Record Number: this is a number we create at the point you are first introduced to the Wellbeing Exeter programme. It will be used to identify you throughout the time you are engaged with the programme.

WHAT OTHER INFORMATION DO WE RECEIVE?

We will add further information to your unique record that is provided by your Partner Community Connector, this could include details about any meetings or communication (for example emails and phone-calls) with your Partner Community Connector, the date of each meeting, the type of support or information provided, the outcome and any further introductions made by your Partner Community Connector to any external organisations, groups or services.

In rare circumstances this could also include further information received from your GP or other healthcare providers. We will only add further information where this is absolutely necessary.

Where you contact us through our website <https://www.wellbeingexeter.org.uk> – we will keep a record of any communication we receive.

ENSURING YOUR RECORDS ARE CORRECT

It is important that the information we hold about you is accurate and up to date. If any of your details change please inform your partner Community Connector.

WHY WE NEED THIS INFORMATION

Without this information we will be unable to provide you with support through the Exeter Wellbeing programme.

YOUR RIGHT TO WITHDRAW YOUR PERMISSION TO PROCESS YOUR PERSONAL INFORMATION AND YOUR SENSITIVE PERSONAL INFORMATION

Except in the circumstances set out below we will only ever process your personal information where you have given us your permission or consent to do so. You may withhold or withdraw your consent at any time but unfortunately, we will be unable to provide the support requested where this happens. We will talk to you or notify you before we take this action.

Sometimes we may get in touch to ask you to provide more information about the support you have received or ask if you would like to be involved in a case study. We will always ask your permission before using your information for these purposes.

WHERE WE PROCESS YOUR PERSONAL INFORMATION FOR THE PURPOSES OF OUR LEGITIMATE INTEREST

We will only process your information in this way where we have given careful consideration to the reason for the processing and whether there is another way to achieve the same result (including for example asking for your consent). We have also considered the circumstances where it is not appropriate to ask for your permission and to ensure that we can legitimately run and maintain the Wellbeing Exeter programme. Examples of the type of processing where we may rely on legitimate interest include:

- Record-keeping for the proper and necessary administration of Wellbeing Exeter.
- For the evaluation and assessment of the Wellbeing Exeter programme.
- Responding to communication received from you and where you have asked us to provide a response.
- Protecting the safety and wellbeing of our staff and the Partner Connectors and where necessary, the legal rights of any party.
- Insuring against or obtaining professional advice that is required to manage risk.
- Protecting you or others against serious risk of harm where we believe we have a duty to do so.
- To comply with a specific legal requirement.

USING YOUR INFORMATION FOR RESEARCH AND EVALUATION PURPOSES

We may also collect, use and share aggregated data such as statistical or demographic data for the purposes of monitoring and assessing the effectiveness of Wellbeing Exeter.

The aggregated data used in our assessment does not directly or indirectly reveal your identity. For example, we may aggregate information or questionnaire responses within a certain geographical area.

We also use a third-party organisation to gather questionnaire data. Questionnaires are only generated with your consent and using only your unique record number. Your Partner Community Connector will provide you more information about how we use questionnaires.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH:

- **Our Funders:** Occasionally we may share your personal information with our Funders but only to the extent this is necessary. This could include for example using your NHS number to evaluate whether Wellbeing Exeter has been successful in reducing the demand for primary and secondary health care providers.
- **Our Support Partners:** These are organisations that provide specific services on our instructions and on our behalf, including organisations who connect you to a Partner Connector and provide certain administrative functions to Wellbeing Exeter.
- **Our IT Support Partners:** These are organisations that provide our database and also provide support and maintenance services.
- **Third Party Organisations, Groups & Services:** These are organisations that provide specific services, activities and support that may be of benefit to you. Your **Partner Community Connector** will agree any introductions to these with you before we share any of your personal information.
- **Third Party Research & Evaluation Specialists:** These organisations, who may operate on our behalf or on the instructions of our Funders, independently assess the success of Wellbeing Exeter.
- **Third Party Questionnaire Providers:** These organisations provide survey and questionnaire services on our behalf.

We require all third parties to only operate on our instructions and to respect the security and confidentiality of your personal information.

TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Your personal information is not transferred outside of the EEA.

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

Your personal information will only be kept for as long as is necessary to deliver the Wellbeing Exeter programme, for the other purposes described in this privacy policy and to meet our legal obligations, for example if we make a safeguarding referral for an individual under 18 years of age we are required to keep the relevant personal information for 50 years. We will carefully

review our retention periods to ensure we only retain your personal information for the minimum period necessary. Whilst we continue to provide you support through Wellbeing Exeter it will be necessary to retain your personal information.

YOUR DATA PROTECTION RIGHTS

You have the following rights under data protection law, summarised below. If you have any questions or wish to make a data protection rights request please use the contact details above. There may be circumstances where we are not required by law, or are unable to meet all, or part of, your request.

We may also need to ask you for specific information to enable us to locate your unique record and where necessary we may ask you to provide information to confirm your identity. We do not usually make a charge for this request but may do so where requests are repetitive or unfounded.

We will respond to your request within one month, if we require more time to complete your request, we will let you know as quickly as possible.

Access to your personal information (a data subject access request): we will provide you with a copy of the personal data we hold about you and to check that we are lawfully processing it.

Correction of your personal information: if we hold incomplete or inaccurate information, you have the right to request its correction.

Withdraw your consent at any time: where we have obtained your permission to process your personal information.

Delete or remove your personal information: this includes where you have given us your permission to process your personal information or where we no longer need it.

Object to our reliance on legitimate interest to process your personal information: where you feel it impacts or has a detrimental effect on your rights and freedoms.

Request restriction of processing of your personal data: whilst we consider your rights request or you have asked us to retain your personal information for a specific reason or purpose.

Request the transfer of your personal data to you or to a third party: where we hold your personal information in an automated format and where you provided your consent to do so.

More information about your individual rights is available on the ICO website: <https://ico.org.uk/your-data-matters>