Privacy Notice

Last reviewed 6/11/24

Context

Centre for ADHD & Autism Support (CAAS) understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone accessing CAAS Services. Any personal data we collect will only be used as permitted by law.

This Privacy Notice applies to your use of CAAS Services and all of your interactions with CAAS, including with our Website. Our website may contain links to other websites or resources from other providers. Please note that CAAS have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Please read this Privacy Notice carefully and ensure that you understand it.

This notice should be read in conjunction with our Data Protection Policy, which can be found on our website, here.

Introduction

The Centre for ADHD & Autism Support is a charity based in Northwest London. We are here to support ADHD and Autistic individuals, families, and professionals.

Our vision is to raise awareness, break down barriers and drive lasting positive change for neurodivergent people in our community. We do this by focusing on our aims, which are to support, educate and empower individuals by providing a range of services and support, including individualised support for young people and adults, courses, social groups, trainings and workshops.

As our work involves working directly with, and recording information about, children and adults, including information about their medical conditions and their support needs, we place extremely high importance on treating the data we hold appropriately, confidentially and safely.

This privacy notice aims to make clear what data we will collect, what the basis is for that collection, and what we will do with it.

Background and Contact Details

In this notice, the following terms have the following meanings:

- "personal data" means any information which could be used to identify you. This could be your name and address, or it could include your bank account details, telephone number or a picture of you. As we provide support services, some of the data we need to gather to deliver those services effectively will be sensitive data about your health and wellbeing, or about your ethnicity.

- "we/us/our" means CAAS (Charity No: 1193799). Being registered with the Charities Commission, CAAS is governed in accordance with charitable law and applies the Charity Code of Governance in order to develop the highest standards of governance. We are also a member of the fundraising regulator, and we follow their code of practice.

If you wish to contact us about your data, or about this privacy notice, please use the contact details below:

By telephone: 0208 429 1552
By email to: data@adhdandautism.org

What information we collect

Appendix one sets out in detail the information we collect, and the basis on which that information is collected. In summary, we collect or use:

- information to provide services and goods, including delivery and third party referrals, eg names, addressed, service use history.
- sensitive information to provide services and goods, including delivery and third party referrals, eg race, religious beliefs, health information and sexual orientation information.
- information to receive donations or funding and organise fundraising activities, eg payment or banking details, donation history, tax information.
- information for the prevention, detection, investigation or prosecution of crimes, eg names, criminal offence data, DBS.
- information for service updates or marketing purposes, eg names, marketing preferences, consent records, website user journey information.
- information to comply with legal requirements, eg contact information, health information.
- information for recruitment purposes, eg NI number, copies of passports, employment history, right to work information.
- information for dealing with queries, complaints or claims, eg service history, witness statements, information related to health and safety, health information.

Lawful bases

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of the possible lawful bases we can rely on set out in UK legislation, and you can find out more about lawful bases on the ICO's website.

The lawful basis we rely on for each of the types of information we collect are set out in detail in the appendix, but in summary are:

- Consent - we have permission from you, after we gave you all the relevant information.
- Contract - we have to collect or use the information, so we can enter into or carry out a contract with you.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.
- Legal obligation – we have to collect or use your information so we can comply with the law.
- Vital Interest - we have to collect or use your information to protect life or health, eg an emergency.

Your data protection rights

Which lawful basis we rely on may affect your data protection rights, which are in brief set out below.

You can find out more about your data protection rights and the exemptions which may apply on the ICO's website (the underlined text in each bullet takes you to the relevant section of the ICO website):

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- Your right to erasure - You have the right to ask us to delete your personal information.
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information.
- Your right to object to processing - You have the right to object to the processing of your personal data.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.

- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. If you make a request to access your data, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this notice.

Where we get personal information from

We obtain information from a range of sources, including:

- Directly from you, eg when you interact with us, access our website, access services from us, tag us from your social media, or send information to us.
- Family members or carers, eg when they interact with us, access our website, access services from us, or send information to us.
- Other health and care providers, eg when they send information to us, or attend a meeting with you and us.
- Social services, eg when they send information to us, or attend a meeting with you and us.
- Charities or voluntary sector organisations, eg when they send information to us, or attend a meeting with you and us.
- Schools, colleges, universities or other education organisations, eg when they send information to us, or attend a meeting with you and us.
- Councils and other public sector organisations, eg when they send information to us, or attend a meeting with you and us.
- Previous employers, eg when sending us a reference or confirming employment history.
- Anyone who fills in our referral form on behalf of a client or potential client.
- Our website, eg visitors and users from cookie data, and any personal data you choose to send us when filling in forms on the site.
- Fundraising websites, eg People's Fundraising or Just Giving.
- Financial processing organisations, eg Paypal or your bank.
- Job sites, eg Indeed.

How we use information

We may use the information we hold about you in the following ways:

- To offer appropriate services to you.
- To improve services and communications for others in the future.
- To respond to requests / queries / complaints you may make.
- To feedback on our performance to our funders (anonymous data only).
- To fulfil our safeguarding responsibilities.
- To discuss how best we can support you with referrers or with other organisations who are involved. in your care (eg social care providers, other charities, health organisations, schools etc).
- To keep a record of your relationship with us.
- To send you information which we think will be of interest to you. We will not pass your contact details to any other organisations for marketing purposes.
- To process your donations or other payments, and to verify financial transactions.
- If you apply for a job, we will use your information for the purposes of recruitment and selection, corresponding with you and equal opportunities monitoring.
- To ensure our services and employment opportunities are accessible and inclusive (eg in respect of disability, race or age).
- To ensure our work is effectively funded (eg, to demonstrate compliance with funder requirements around where clients are on a diagnostic pathway, or to tell you about fundraising events).

- To generate reports on our work to ensure we are effectively monitoring and evaluating ourselves.

Who we share information with

We may, where appropriate, and in a proportional manner, share your personal information with:

- Organisations we need to share information with for safeguarding reasons.
- Organisations we need to share information with who are involved with your care.
- Emergency services.
- Legal bodies or authorities.
- Organisations we're legally obliged to share personal information with.
- Trusted suppliers with their own privacy notices (such as MailChimp, which we use to send out service and marketing information, Kuola, our website provider, and Eventbrite, which hosts webinars).

We will also share anonymised information with funders for reporting purposes. If you are or have been an employee of CAAS, we may share your personal information when responding to requests from future employers.

We will not sell or share your personal information, including contact and email details, to anyone else for marketing purposes. You can always update your preferences by emailing data@adhdandautism.org.

How long we keep information

When CAAS collects personal data, it will be processed and stored securely, for no longer than is necessary. We will safeguard your rights under data protection legislation at all times.

The information we retain about the services you have accessed, and the support we have provided, is stored in Charity Log (a well-regarded charity computer system). Each April we review our database and anonymise records where we have not had any contact with the individual or their relatives for over three years.

Other information is kept for various lengths of time, depending on the purpose for which it was collected. For example, financial data is retained for 7 years; we keep a permanent record of donors for administration purposes; if you apply for a job we will retain job applications for 6 months or for 6 years after you leave employment if your application is successful. If you consent to us sending you emails, your name and email address are held indefinitely, so we can respect your email preferences (including unsubscribe requests)

You have the right to withdraw your consent to CAAS using your personal data at any time, and to request that CAAS delete it. Doing so will restrict your ability to use CAAS Services.

Please see Our Data Protection Policy for further details on Data Subject Access, Rectification of Personal Data, and Erasure of Personal Data.

Sensitive Data and Clients

Data protection law recognises that certain types of personal information are more sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

Sensitive information will only be collected where necessary, for example, we may need to collect ethnicity information to monitor back to funders, or health information from you when you register for a challenge event, or to tailor our support services. Clear notices will be provided at the time we collect this information, stating what information is needed, and why.

We take our obligation to keep all your data safe and secure very seriously, and access within our organisation is on a 'need to know' basis. Staff are only allowed access to data once they have been sufficiently trained and have signed our confidentiality agreement.

CAAS provide services to Children and Young People. If you're aged 16 or under, you must get your parent/guardian's permission before you provide any personal information to us. Consent will be sought from parents/guardians in order for services to be provided.

We understand that additional care may be needed when we collect and process the personal information of children, and of vulnerable members, supporters or volunteers. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people. All staff and volunteers are required to attend regular safeguarding and data protection training, and comply with our procedures around online working.

Cookies

A "cookie" is a small text file that is placed on a website user's device/computer hard drive by a website. There are various types of cookie and they may be essential or non-essential to the operation of the website but all have a purpose.

When you first visit our website, you can choose to accept or decline our non-essential cookies, and you can adjust that choice at any time by clicking on the cookies pop up. We will use a cookie to record if you have accepted the use of cookies on this website. This cookie will be stored on your device/computer. The information from cookies helps us improve our website and make sure we can show you relevant content. If we collect information that could identify you, we will always ask for your consent.

The cookies we use on the website are Google Analytics, which are widely by websites to collect information about how website visitors use a site and to improve websites. Google Analytics collect information in an anonymous form and will not allow us to identify you or collect any personal information about you. Google Analytics does not track your internet activity after leaving the website.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us or ask us a question by using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint

Monitoring and Review

The CEO is responsible for managing this notice and overseeing its implementation. Every member of staff should take personal responsibility for understanding and complying with it. If the matter is taken to the Trustees, then the Chair of Trustees is responsible for ensuring this notice is complied with in full.

This privacy notice describes the main personal data processing we do. It doesn't provide every detail of all the ways we collect and use personal information. If you need any extra information or have any questions, please email us on data@adhdandautism.org

This notice will be reviewed as needed, and at least every three years. Any updates will be published on our website, and any significant changes will be communicated to everyone who has consented to receive information from us via email.

Appendix One : The data we collect, and the basis on which we collect it.

What information we collect, use, and why	Our lawful bases for the collection and use of your data
We collect or use the following information to provide services and goods, including delivery and third party referrals: • Names and contact details • Gender • Pronoun preferences • Addresses • Date of birth • Emergency contact details • Next of kin details • Photographs or video recordings • Service use history • Health information (including medical conditions, test results, allergies, medical requirements and medical history) • Information about support requirements • Records of meetings and decisions • Payment details (including card or bank information for transfers and direct debits) • Website user information (including user journeys and cookie tracking) • Information relating to compliments or complaints	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time. • Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object. • Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are: as our services are tailored to support ADHD and autistic people, we collect information on the condition that an individual is diagnosed with, and whether they have on a waiting list for a diagnosis, so that we can offer the most suitable support to them.
We also collect or use the following sensitive information to provide services and goods, including delivery and third party referrals: • Racial or ethnic origin • Religious or philosophical beliefs • Health information • Sexual orientation information	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time. • Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object. • Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are: as our services are tailored to support ADHD and autistic people, we collect information on the condition that an individual is diagnosed with, and whether they have on a waiting list for a diagnosis, so that we can offer the most suitable support to them.

What information we collect, use, and why	Our lawful bases for the collection and use of your data
We collect or use the following information to receive donations or funding and organise fundraising activities: • Names and contact details • Addresses • Payment or banking details • Donation history • Tax payer information (for Gift Aid purposes)	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
We collect or use the following personal information for the prevention, detection, investigation or prosecution of crimes: • Names and contact information • Customer or client accounts and records • Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks) • Health information	• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
We collect or use the following personal information for service updates or marketing purposes: • Names and contact details • Addresses • Marketing preferences • Donation history • Website and app user journey information • Records of consent, where appropriate • Health information	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
We collect or use the following personal information to comply with legal requirements: • Name • Contact information • Health information	• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
We collect or use the following personal information for recruitment purposes: • Contact details (eg name, address, telephone number or personal email address) • National Insurance number • Copies of passports or other photo ID • Employment history (eg job application, employment references or secondary employment) • Education history (eg qualifications) • Right to work information • Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks) • Health information	• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

What information we collect, use, and why	Our lawful bases for the collection and use of your data
We collect or use the following personal information for dealing with queries, complaints or claims: • Names and contact details • Address • Purchase or service history • Witness statements and contact details • Relevant information from previous investigations • Information relating to health and safety (including incident investigation details and reports and accident book records) • Correspondence • Health Information	• Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are: when responding to queries and complaints we need to ensure we have all the information necessary to respond accurately and fairly.