Privacy Statement

Luminus Insight CIC trading as "Luminus" and "Healthwatch Surrey"

Luminus Insight CIC (Community Interest Company) is an independent, not for profit organisation, which exists to empower people to have their voices heard in the design and delivery of public services; and to help organisations provide equity of access and the best services possible through the inclusive involvement of local people.

Originally set up in 2013 as Healthwatch Surrey CIC to deliver the local Healthwatch service in Surrey, covering NHS and social care services, we have now expanded our scope to provide local people with a voice on other public services and the wider determinants of wellbeing and changed our name accordingly.

To be able to provide our relevant services to you we keep records about you. Our legal basis for doing this depends on the service(s) that you are accessing and is set out later in the notice. Participants are under no obligation to provide information and can choose freely whether to share their experiences or not.

This Privacy Statement explains how we handle information that we collect about people in the course of our work and the data processing practices that we have in place. We are strongly committed to data security, and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us. Only authorised employees, contractors and volunteers under strict controls will have access to your personal information. Any information that you give will be held in accordance with the current data protection regulations.

Find out more about our purpose and what we do at www.luminus-cic.uk

1. What information do we collect?

During our day-to-day business, we collect a range of personal information, experiences, and opinions from the individuals we are in contact with across a variety of platforms.

This includes:

• Information about people who use our website(s) – www.luminus-cic.uk and www.healthwatchsurrey.co.uk
• Information about people who share their experiences with us by other means
• Information about people who sign up to our insight bulletin/newsletters
• Information about people applying to work for us or volunteer with us
• Information about people who work at organisations in the health and social care sector, voluntary, charity and faith sector organisations based in Surrey as well as some NHS services.

Further information about each of these categories can be found below:

Information about people who use our website

Please note that this section relates to the Luminus Insight CIC and Healthwatch Surrey website only. We are not responsible for the content or practices of websites that may be accessed via links from our website.

The Luminus Insight CIC and Healthwatch Surrey websites do not automatically capture or store any personal information apart from your IP address which is needed to allow you to download the website onto your device. We will only request personal information from you when you complete an online form, provide feedback from a survey we are running or send us an email.

If you visit our websites www.luminus-cic.uk or www.healthwatchsurrey.co.uk we will capture some information about your visit using cookies. Cookies are small text files that are placed on your computer by websites that you visit. They help us analyse how the website is used and to identify areas for improvement. We use cookies to see the volume of website visitors and analyse how the content of our website is viewed. Some of this information is gathered by our web content management system and some is gathered by Google Analytics. You can choose not to allow cookies to be used by adjusting your browser settings, however this may affect website functionality. For further information, visit www.allaboutcookies.org .

Please be aware that some systems on our website require the use of cookies. We will always state if this is the case. More information on the use of cookies can be found on the Healthwatch England website: www.healthwatch.co.uk/cookies and in our Luminus Cookie Policy.

Information about people who share their experiences with us in other ways

There are a number of other ways that we collect feedback from people off-line about their experiences of using local services day to day. These include:

- Our staff and volunteers visit different health and social care, community settings and high street locations as part of our role to talk to the public and evaluate how services are being delivered.
- We receive phone calls and requests for information directly from members of the public as part of our advice and signposting service.
- We collect feedback from people about their experiences of using local services via our Helpdesk.
- We receive completed feedback forms and surveys by post.
- We receive text messages to our text phone.

You are under no obligation to provide information to us and can choose freely whether to share your experiences. Where you do provide information, you do so on the understanding that it will be stored, used and shared in accordance with our legal basis to do so as set out in this Privacy notice.

On occasion we also receive information from the families, friends or carers of people who access local services. It is the responsibility of the person providing the information to ensure they have permission to do so from the person whose experience is being shared.

Information about our own staff and people applying to work with us

We need to process personal data about our own staff (and people applying to work for us) so that we can carry out our role and meet our legal and contractual responsibilities as an employer. Details can be found in the employee handbook or provided separately to job applicants.

Information about our volunteers and people applying to volunteer with us

We need to process personal data about our volunteers (and people applying to volunteer for us) so that we can successfully manage the volunteer communication and assign volunteer tasks. Any personal information that you provide to us will be stored, used and shared in accordance with our legal basis to do so as set out in this Privacy notice.

Information about our Stakeholders

We need to process personal data about our stakeholders who work at organisations in the health and social care sector, voluntary, charity and faith sector organisations based in Surrey as well as some Surrey County Council and NHS services. Any personal information provided to us will be stored, used and shared in accordance with our legal basis to do so as set out in this Privacy notice.

2. How do we hold your information and keep it secure?

Electronic information that we collect is held in:

- **Microsoft office 365 Business Licenses** - (including SharePoint) where access is restricted according to staff role. The data resides in servers in the UK.

- **Email** – All internal emails are sent securely. Where it is necessary to send an email containing personal information externally, the sender encrypts the email using Egress Switch. Access to shared email accounts is restricted according to job role.

- **Informatics** - A secure digital database provided by Circle Interactive whose servers are based in Ireland. We have a data processing agreement in place with them to ensure the data they hold is held in accordance with current UK data protection legislation.

- **Smart Survey** – holds responses to surveys that are completed anonymously via our website. Smart Survey has servers located in the UK and we have a data processing agreement in place with them to ensure the data they hold is held in accordance with current UK data protection legislation. We may use AI to suggest some survey questions but will state when we do so.

- **Better Impact** - a volunteer management system which holds personal information about those who apply to volunteer with us and those who are accepted as volunteers. We have a data processing agreement in place with them to ensure that all data is processed in a manner compliant with current data protection legislation. Better Impact servers are based in Canada. Data transfer to Canada is covered by a UK adequacy decision in line with the adequacy decision taken by the European Commission. Information that is held in paper format is held in secure, lockable storage where access is restricted to Luminus Insight CIC staff and relevant volunteers only and destroyed as appropriate according to our retention policy.

3. How do we use your personal information and on what legal basis?

The personal information you have provided to us can be used for the following purposes:

- In our day-to-day work as an independent, not for profit voice organisation
- To facilitate the analysis of Health and Social Care provision nationally by Healthwatch England
- To send you our newsletter, report or insight bulletin where you have requested it
- To respond to any queries you may have
- To improve the quality and safety of care through the publication of reports
- To consider your application to be an employee or volunteer for our organisation

We will never share your name or contact details unless:

- You have given us specific permission,
- We are required by law, for example to prevent abuse of an older person or child,
- We are permitted by law, for example where public interest overrides the need to keep the information confidential.

Whilst your name or contact details will not be shared, there may be instances where full anonymisation is not possible to make change happen on your behalf. We do not use automated decision-making processes.

If our team use AI to provide insight into data, the data will be anonymised, it's use will be documented and any AI learning tools, will be switched off.

The legal grounds we rely on to process your information

Luminus Insight CIC Services and the legal basis for processing your information:

Healthwatch Surrey commissioned by Surrey County Council

Under UK law, in the Freedom of Information Act 2000, Healthwatch Surrey is designated as a public authority. Information will be held, stored and processed under the legal basis of 'Public Task' Article 6(1)e of the GDPR). Where special category data is processed, this is done under the condition that the processing is necessary for reasons of public interest in public health, such as ensuring high standards of quality and safety of health care (Article 9 (2)i of the GDPR).

Giving Carers a Voice commissioned by Surrey County Council

Information will be held, stored and processed under the legal basis of 'Legitimate Interests' (Article 6(1)f of the GDPR) with the associated condition of **health or social care** for processing special category data (Article 9(2)h of GDPR).

Surrey Substance Use Partnership commissioned by Surrey County Council

Information will be held, stored and processed under the legal basis of 'Legitimate Interests' (Article 6(1)f of the GDPR) with the associated condition of **health or social care** for processing special category data (Article 9(2)h of GDPR).

4. How we share information with other organisations

We only share your information with other organisations in accordance with our legal basis as set out in this Privacy Notice. We share information with three categories of third-party organisations:

• **Circle Interactive** provide our database and is a data processor on our behalf. Access to this secure database is restricted according to job role. We have a data processing agreement in place with Circle Interactive to ensure the data they hold is held in accordance with current UK data
protection legislation.

• **Healthwatch** - where you share experiences about services based in other counties, we may share that information with the Healthwatch covering the relevant area. This would be done by secure email.

• **Better Impact** - provide a system that manages our volunteers' personal data. We have a data processing agreement in place with them to ensure that all data is processed in a manner compliant with current data protection legislation. Better Impact servers are based in Canada. Data transfer to
Canada is covered by a UK adequacy decision in line with the adequacy decision taken by the European Commission. Access is restricted according to job role.

Additionally, when you share an experience with us, it will be included in our analysis of the health and social care services. We share this information in person or using secure electronic means with those responsible for health and social care services in Surrey and some of it used in Luminus Insight CIC reports and publications to help influence the way services are delivered in the future. We never share our mailing lists with any other organisation.

We are compliant with the National Data Opt-Out.

5. How long we keep and when we dispose of personal data

Personal data is deleted or securely destroyed at the end of its retention period. Retention periods are set out in our retention policy, please contact us if you require further information.

6. Your right to access information about you

If you think we may hold personal data relating to you and want to see it, please write to us using the Contact Details below.

7. Complaints about how we look after or use your information

If you feel that we have not met our responsibilities under the current data protection legislation, you have a right to request an independent assessment from the Information Commissioner's Office (ICO). You can find details on their website www.ico.org.uk.

8. Correcting or deleting your personal data

If you know that we are holding your personal data and believe that it may be wrong, or if you would like us to stop holding it, then you can contact us using the details below.

9. Our contact details and key roles

Luminus Insight CIC is data controller for all the personal data that you provide us with. Any queries or concerns relating to the processing of personal data by or on behalf of Luminus Insight CIC may be sent to:

Freepost RSYX-ETRE-CXBY, Astolat, Coniers Way, Burpham, Surrey, GU4 7HL

Email: enquiries@healthwatchsurrey.co.uk

Telephone: 0303 303 0023 Text: 07592 787533

Luminus Insight CIC has designated Rebecca Griffin, Operations Manager at Surrey Independent Living Charity as a Data Protection Officer under Article 37 of the GDPR