



Thera Group - Privacy Notice

Introduction

We, Thera Group, are the ‘controllers’ of the information which we collect about you (‘personal data’). Being controllers of your personal data, we are responsible for how your data is processed. The word ‘process’ covers most things that can be done with personal data, including collection, storage, use and destruction of that data.

This notice explains why and how we process your data, and explains the rights you have around your data, including the right to access it, and to object to the way it is processed. Please see the section on ‘Your rights as a data subject’ for more information.

Thera Group includes Thera Trust, Thera North, Thera East Midlands, Thera East Anglia, Thera East, Thera South Midlands, Thera South West, Thera (Scotland), Forward Housing SW, Dosh Ltd, The Quality Company Ltd, The Camden Society, Unity Works Social Enterprises, The Camden Society (London), Aspire Living Ltd, Equal Futures, Ansar Projects Ltd, Uemploy Ltd, Thera West, Thera Ltd, Thera North Trading Ltd, Thera East Midlands Trading Ltd, Thera East Anglia Trading Ltd, Thera East Trading Ltd, Thera South Midlands Trading Ltd, Thera South West Trading Ltd, Thera (Scotland) Trading Ltd, The Camden Society Trading Ltd, Aspire Living Trading Ltd, Ansar Projects Trading Ltd.

We are a charitable group of companies and our contact details are:

Address:	The West House, Alpha Court, Swingbridge Road, Grantham, Lincolnshire, NG31 7XT
Email:	dataprotection@thera.co.uk
Telephone number:	0300 303 1280

Our Data Protection Officer (DPO) can be contacted at The West House, Alpha Court, Swingbridge Road, Grantham, Lincs, NG31 7XT, EMAIL: dataprotection@thera.co.uk, or on TEL: 0300 303 1280 if you have any queries about this notice or anything related to data protection.

Personal data

‘Personal data’ is any information that relates to a living, identifiable person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

We are committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process data if we need to for a specific purpose, as explained below.

We collect your personal data mostly through our contact with you, and the data is usually provided by you, but in some instances we may receive data about you from other people/organisations (including other companies within the Thera Group). We will explain when this might happen in this Notice.

Other Data Controllers

If you benefit from a service from any of the companies within the Thera Group, we will share your personal data with these companies (as applicable) and these companies may also act as data controllers with respect to the data you provide to us.

Your data and how and why we process it

In general terms, we process your data in order to manage our relationship with you. The table below lists more specific purposes for processing your data, and the legal basis for each type of processing.

Key to table below:

- * Information highlighted in **green** is defined as ‘**special category/sensitive**’ data.
- * Information **in red** may be collected from a third party. Please refer to the section below for the third parties we collect this information from.
- * Information highlighted in **pink** relates to profiling and automated decision making/processing. Automated decision making is the use of your personal data processed solely by automatic means which could have a significant effect on you as an individual.

Data processing	Legal basis for processing
<p><u>People Supported:</u></p> <ul style="list-style-type: none"> • <i>Getting to know you</i> – information about you so that we can get to know you before we start supporting you. <p>The types of information we may process about you are, for example: Name, age, date of birth, gender, address, marital/living status, contact telephone numbers, email address, IP address, next of kin and their contact details, your landlord, GP and care provider(s), National Insurance number, any reference number from your local authority, any reference number to receive benefits payments, your bank account details and balance, any other assets or savings, your current benefits, any other information provided on the 'Getting to Know You' form or your Individual Agreement.</p> <ul style="list-style-type: none"> • <i>Supporting you</i> – information about you, your support and the requirements for that support (including details of your health and your household if this is relevant to your support). <p>The types of information we may process about you are, for example: current health, medical history, details of any medicines, details of your doctor, your likes and dislikes, life history, dreams and aspirations, how you respond to people and situations, any relevant convictions, utility suppliers, contact details of people who need to know your address, financial information, last person or organisation which supported you, details of anyone else who supports you (including other</p>	<p>Processing is necessary for the performance of a contract. If we do not receive the information we need before we start to support you, we may not be able to provide you with the best support possible.</p> <p>Processing is necessary for the performance of a contract. If we do not receive the information we need, we may not be able to provide you with the best support possible.</p> <p>In relation to special category data, processing is necessary for the provision of health or social care, where the processing is carried out by, or under the responsibility of, health professionals.</p>

companies within the Thera Group),
Information in your Personal Care
Plan, or Community Treatment Plan.

- *Other information about you – this is information you would like us to have.*

The types of information we may process about you are, for example: contact details of friends, family or neighbours, Power of Attorney, bank details and direct debit information, your credit history, DBS searches, anything from your existing support staff if they become our employee, voice and video recordings for safety, crime reduction and quality management, details of any complaints you might make and how we deal with these, as well as any other information you may think is relevant to helping us support you.

- *Thera Communications/Documents – we may sometimes ask if you would like to appear in our marketing materials and other documents. This might be our Thera Voice or Dosh ‘Money Pack’ newsletters, Thera’s website and other social media, annual report and accounts, photos for the Thera Group websites, special occasions, eg. Thera’s 20th anniversary (2018)*

The types of information we may process about you are, for example: Name, photo image, details of your story, members of your circle of support.

- *Research Materials – Social Impact Report produced in connection with Thera’s charity bond on an annual basis to show the social impact and*

Processing is necessary for the performance of a contract. If we do not receive the information we need, we may not be able to provide you with the best support possible.

In relation to special category data, processing is necessary for the performance of the contract and is authorised by law to enable the processing of criminal information for safeguarding reasons.

The data subject has given consent to the processing of his or her personal data in relation to Thera’s marketing materials.

Processing is necessary for compliance with a legal responsibility for Thera to provide an

<p>financial performance of the Thera Group. This piece of work specifically includes ongoing impact management within the Thera Group to plan and prioritise action and resources. Other pieces of research work (including work with King’s College, London).</p> <p>The types of information we may process about you are, for example: Photo image, details of your story/support (which may include health, financial and housing matters), members of your circle of support, gender, age.</p> <ul style="list-style-type: none"> • <i>Tenders</i> – all information is anonymised. 	<p>annual social impact report to investors in the charity bonds.</p> <p>The data subject has given consent to the processing of his or her personal data if they are mentioned specifically in the report/research as an individual.</p> <p>In relation to special category data, processing is necessary for the provision of health or social care, where the processing is carried out by, or under the responsibility of, health professionals.</p> <p>Processing is necessary for the legitimate interests of enabling Thera to undertake contracts/tenders.</p>
<p><u>Staff</u> (including agency staff):</p> <ul style="list-style-type: none"> • <i>Payroll</i> - Payment of tax, National Insurance, expenses, pensions • <i>HR Recruitment</i> – DBS check, reference requests, maintaining staff files, Occupational Health referrals • <i>Performance Management</i> – staff reviews, capability and disciplinary processes, Occupational Health referrals, making adjustments for colleagues with disabilities. • <i>HR Information about you</i> – held on your personal HR file • <i>IT information/monitoring</i> - The company’s IT team perform monitoring of its systems. This can include email, internet use, and usage of devices. 	<p>Processing is necessary for the purposes of legitimate interests; we will need to know this information so that we can employ you.</p> <p>In relation to special category data, processing is necessary for the performance of the contract and is authorised by law to enable the processing of criminal information for safeguarding reasons.</p> <p>In relation to special category data, processing is necessary for the provision of Occupational Health services.</p> <p>Processing is necessary for the purposes of legitimate interests; to ensure Thera’s systems remain compliant with relevant legislation, provide an acceptable level of service and adherence to policy by staff members.</p>

<ul style="list-style-type: none"> • <i>Thera Communications/Documents</i> – we may sometimes ask if you would like to appear in our marketing materials and other documents. This might be our Thera Voice or Dosh ‘Money Pack’ newsletters, Thera’s website and other social media, annual report and accounts, photos for the Thera Group websites, special occasions, eg. Thera’s 20th anniversary (2018) • <i>Health and Safety Incident Reports</i> – details of any incidents (which may include photos) • Research Materials – Social Impact Report produced in connection with Thera’s charity bond on an annual basis to show the social impact and financial performance of the Thera Group. This piece of work specifically includes ongoing impact management within the Thera Group to plan and prioritise action and resources. • Other pieces of research work (including work with King’s College, London). • <i>Tenders</i> – all information is anonymised. <p>The types of information we may process about you from the above processes are, for example: Name, age, date of birth, gender, address, contact telephone numbers, email address, IP address, next of kin and their contact details, National Insurance number, bank details, photo image, your story, previous employment details, school qualifications, current health, medical history, details of any</p>	<p>The data subject has given consent to the processing of his or her personal data in relation to Thera’s marketing materials.</p> <p>Processing is necessary for the purposes of our legal obligations as an employer (Health & Safety at Work Act, RIDDOR).</p> <p>Processing is necessary for compliance with a legal responsibility for Thera to provide an annual social impact report to investors in the charity bonds.</p> <p>Processing is necessary for the performance of research work carried out in the public interests of the wider sector which supports vulnerable adults.</p> <p>Processing is necessary to enable Thera to undertake contracts/tenders.</p> <p>The data subject has given consent to the processing of his or her personal data where they can be identified as an individual.</p>
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<p>medicines, details of your doctor, utility suppliers, job role and title.</p>	
<p><u>Volunteers:</u></p> <ul style="list-style-type: none"> • <i>Payroll</i> - payment of expenses • <i>Recruitment</i> – DBS and PVG checks, references, CVs • <i>IT Information</i> – to assist with use of IT equipment and systems/ processes • <i>Thera Communications/Documents</i> – we may sometimes ask if you would like to appear in our marketing materials and other documents. This might be our Thera Voice or Dosh ‘Money Pack’ newsletters, Thera’s website and other social media, annual report and accounts, photos for the Thera Group websites, special occasions, eg. Thera’s 20th anniversary (2018). • <i>Tenders</i> – all information is anonymised. <p>The types of information we may process about you are, for example: Name, age, date of birth, gender, address, contact telephone numbers, email address, IP address, next of kin and their contact details, National Insurance number, bank details, photo image, previous employment details, school qualifications, utility suppliers,</p>	<p>Processing is necessary for the purposes of legitimate interests; we will need to know this information so that we can employ you as a volunteer.</p> <p>In relation to special category data, processing is necessary for the performance of the contract and is authorised by law to enable the processing of criminal information for safeguarding reasons.</p> <p>Processing is necessary for the purposes of legitimate interests; to ensure Thera’s systems remain compliant with relevant legislation, provide an acceptable level of service and adherence to policy by staff members.</p> <p>The data subject has given consent to the processing of his or her personal data in relation to Thera’s marketing materials.</p> <p>Processing is necessary to enable Thera to undertake contracts/tenders.</p>

<p><u>Family and Friends</u> (including professional friends, eg. care managers):</p> <ul style="list-style-type: none"> • Keeping them informed on events and the organisation in general. • Next of kin information. <p>The types of information we may process about you are, for example: Name, address, contact telephone numbers, email address, relationship to Thera</p>	<p>The data subject has given consent to the processing of his or her personal data in relation to Thera’s marketing materials.</p> <p>Processing is necessary in order to protect the vital interests of the data subject or of another natural person.</p>
<p><u>Children</u></p> <ul style="list-style-type: none"> • Some of our companies provide support to children to undertake activities, eg. youth clubs. <p>The types of information we may process about you are, for example: Name, address, contact telephone numbers, email address, relationship to Thera</p>	<p>Processing is necessary for the purposes of legitimate interests; we will need to know this information in case of an emergency involving a person/s we support.</p>

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.

Personal data received from third parties

This is a list of your personal data that we may receive from other people or organisations.

Data	Source
<p><u>People Supported:</u></p> <ul style="list-style-type: none"> • Reference Requests • Information about you • Information about you • Support information (including medical and financial) 	<ul style="list-style-type: none"> • Previous employers • Family, friends, Circles of Support • Person who has a Power of Attorney, Deputyship, Appointeeship or Guardianship for you • Previous care providers/ support workers/ advocates/ medical staff/ financial advisors and brokers/ DWP and other benefit agencies/ local authorities/ credit reference

<ul style="list-style-type: none"> • If you use the website to buy your support direct from Thera • Statistical analysis/ survey results/ research comparisons • Photos/ people's stories/ quotes 	<p>agencies/ other companies within the Thera Group</p> <ul style="list-style-type: none"> • Online support systems • Various surveys/HR Software Provider/ internal Group documents • Specific permission sought from circles of support/ general research findings
<p><u>Staff</u> (including agency staff):</p> <ul style="list-style-type: none"> • Reference Requests • TUPE transfer information • Recruitment checks • Occupational Health Referrals • Ongoing HR work • Additional staff support requirements • Statistical analysis/ survey results/ research comparisons • Photos/ people's stories/ quotes 	<ul style="list-style-type: none"> • Previous employers • Other Care Providers • Disclosure and Barring Service/ Disclosure Scotland • Health Management portal • HR Software provider • Recruitment Agencies/ Consultants • Various surveys/HR Software Provider/ internal Group documents • Specific permission sought from circles of support/ general research findings
<p><u>Volunteers:</u></p> <ul style="list-style-type: none"> • Reference Requests • Recruitment checks • Training Records 	<ul style="list-style-type: none"> • Previous employers • Disclosure and Barring Service/ Disclosure Scotland • Previous training providers
<p><u>Family and Friends</u> (including professional friends, eg. care managers):</p> <ul style="list-style-type: none"> • Data relating to supporting the individual/ holding next of kin information 	<ul style="list-style-type: none"> • Family, friends, Circles of Support • Previous care providers/ support workers/ advocates/ medical staff/ financial advisors and brokers/ DWP and other benefit agencies/ local authorities/ credit reference agencies/ other companies within the Thera Group

<p><u>Children</u></p> <ul style="list-style-type: none"> • Data relating to supporting the individual/ holding next of kin information 	<ul style="list-style-type: none"> • Family, friends, Circles of Support • Previous care providers/ support workers/ advocates/ medical staff/ financial advisors and brokers/ DWP and other benefit agencies/ local authorities/ credit reference agencies/ other companies within the Thera Group
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Who we share your data with

For some processing purposes we share your data with third parties. This is a list of the information we may share with external recipients, and for what purpose:

Recipients of your data	Purpose for sharing
<p><u>People Supported:</u></p> <ul style="list-style-type: none"> • Potential employers • Government bodies, eg. Care Quality Commission (CQC), Scottish Care Inspectorate, The Charity Commission, OSCR • Other Thera Group companies • Barclays Bank including Barclays.net online banking • Other care staff who support you • DWP and other benefits agencies/banks • Archive companies • Local authorities • Family/ Circle of Support • Police • Investing for Good • Research facilities • Utilities companies • Social media (eg. Twitter, LinkedIn, Facebook) • IT Providers 	<ul style="list-style-type: none"> • Providing references • Providing information on request/ statutory filing • Support information for services they provide/ data management sharing • Providing managed client accounts • Providing continuity of support and best interests decision making • Data management sharing • Storage of information • Support information for services provided • Support information for services provided • For vital interests/decision making • Social Impact Reporting • Research work • As part of our work in supporting you • Public channels for sharing news about Thera and stories

<ul style="list-style-type: none"> • Data Recovery Site provider (Providers of systems where they are hosted by the provider and not located in the company server rooms. Your personal information is contained within the systems and checks are made to ensure the provider has very limited access, and only for the purpose of troubleshooting). • Online support planning provider • PR and Marketing companies • Other Suppliers (eg. Royal Mail) • Housing Associations/Landlords • Auditors/Solicitors • Contractors/Consultants 	<ul style="list-style-type: none"> • Companies which run Thera Group IT systems • Assist with Business Continuity and Disaster Recovery • Maintains online support planning system • Help in production of marketing materials • Enables Thera to provide our services to you or who provide services on our behalf • Tenancies • Help with all regulatory audit and legal requirements for the Group • Contractors or consultants who are undertaking work for Thera Group for a defined purpose and for a fixed time period
<p><u>Staff</u> (including agency staff):</p> <ul style="list-style-type: none"> • Potential employers • Recruitment Agencies/ Consultants • Government bodies, eg. Office for National Statistics (OFNS), Disclosure and Barring Service • Barclays.net and other banking systems • Other Care Providers • Other Thera Group companies • Archive companies • Police • HR Software Provider • Companies House • IT Providers • Data Recovery Providers • PR and Marketing companies 	<ul style="list-style-type: none"> • Providing references • Additional staff support requirements • Regulatory processing of statutory information • Pay details • TUPE transfer information • Information for TUPE transfers, meeting minutes • Storage of information • Criminal proceedings/convictions • Processing salaries, expenses, day-to-day HR processes • Directors filings, completing annual confirmation statements • Company which runs Thera IT systems • Assist with Business Continuity and Disaster Recovery

<ul style="list-style-type: none"> • Other Suppliers (eg. Royal Mail) • Auditors/Solicitors • Contractors/Consultants 	<ul style="list-style-type: none"> • Help in production of marketing materials • Enables Thera to provide our services to you or who provide services on our behalf • Help with all regulatory audit and legal requirements for the Group • Contractors or consultants who are undertaking work for Thera Group for a defined purpose and for a fixed time period
<p><u>Volunteers:</u></p> <ul style="list-style-type: none"> • Potential employers • The Charity Commission/ OSCR (Scotland) • Companies House • Archive companies • HR Software Provider • IT Providers • Data Recovery Providers • Other Suppliers (eg. Royal Mail) • Auditors/Solicitors • HR staff Rostering system provider • Stationery suppliers • Chevin (Roadbase system) 	<ul style="list-style-type: none"> • Providing references • Completing annual returns (Directors only) • Director filings, completing annual confirmation statements • Storage of information • Processing expenses payments • Company which runs Thera Group IT systems • Assist with Business Continuity and Disaster Recovery • Enables Thera to provide our services to you or who provide services on our behalf • Help with all regulatory audit and legal requirements for the Group • Staff rostering • Staff stationery suppliers • Driver and vehicle management software
<p><u>Family and Friends</u> (including professional friends, eg. care managers):</p> <ul style="list-style-type: none"> • Thera Group of Companies 	<ul style="list-style-type: none"> • Information relating to the support of the individual as well as next of kin information
<p><u>Children</u></p> <ul style="list-style-type: none"> • Thera Group of Companies 	<ul style="list-style-type: none"> • Information relating to the support of the individual as well as next of kin information

How we store your data

Your personal data is held in both hard copy and electronic formats.

Electronic data, including emails, is stored on our servers or in systems provided to us by the software suppliers we contract with, which are located mainly in the UK, as well as a small proportion of data stored in the US, on our software suppliers' servers.

We only store personal data in and transfer it to countries or jurisdictions where it will have an adequate level of protection or where we are able to provide appropriate safeguards and make sure that your rights as a data subject can be enforced.

If we store or transfer personal data to other jurisdictions not mentioned below we will tell you about the transfer and the safeguards in place to protect your data, before the transfer.

Location/transfers of data outside the EU	Safeguards
<p>By default and preference, Thera Group's servers and systems are held within the EU. However, if there is a clear advantage to the organisation and the people it supports in doing so, we will consider the use of servers and systems outside of the EU.</p> <p>The only data currently stored outside the UK is data information about staff and the people they support, which is stored in the US.</p>	<p>Where there is a specific advantage to using a supplier whose system is based outside of the UK, we will only make use of it if the supplier recognises and implements the necessary requirements in line with UK data protection law. This scenario would also require a detailed data privacy impact assessment and sign off from the Group Executive team, which has been the case for the data stored in the US.</p>

How long we keep your data

Information about how long we process your data for is determined by our Information Security Management System.

Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to keep the data longer, or there are important and justifiable reasons why we should keep it, we will securely delete the data.

Cookies on our website

Cookies are small files which websites store on your computer and which contain various types of information about your visit to a website. They are not viruses or malicious software but they are generally aimed at providing you with a good experience when browsing a site by, for example, remembering your preferences so that you do not need to reset them every time you visit the website.

Cookies can record information about how you browse the internet. They can therefore be used by websites to advertise goods and services which, based on your browsing history, are similar to goods and services which you have previously searched online. This is why some users reject or delete cookies.

Cookies normally expire after a length of time which can vary from a few minutes to more than a year. Some cookies are 'session cookies' which are deleted when you close your internet browser or after a period of inactivity. Others are 'persistent cookies' which remain on your computer until their expiration date.

We do not store cookies on your computer without your consent, unless they have the sole purpose of carrying out the transmission of communications or they are strictly necessary for providing an online service.

You may restrict or block cookies which are set by any website through your browser settings. Your browser settings also allow you to clear your browsing history and delete cookies. Information about how you can do this can be found on this link <https://ico.org.uk/for-the-public/online/cookies>. Mobile devices may have their own settings and you need to refer to the manual of the device.

Please note that restricting or disabling cookies may impact the functioning of parts of our website.

The Thera Group website uses the following cookies:
<https://www.thera.co.uk/support/privacy/>

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;

- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer: TEL: 0300 303 1280, EMAIL: dataprotection@thera.co.uk, BY POST: The West House, Alpha Court, Swingbridge Road, Grantham, Lincs, NG31 7XT.

Right of Access

You have a legal right to access information that we hold about you and seek confirmation that your data is being processed legally. If you ask us, we will not charge a fee unless further copies of the same information are requested or the request for information is considered excessive; the fee charged will be to cover our administrative costs. On occasion we have the right to refuse a request and will write to you to confirm the reasons why. You can write to our Data Protection Officer at our office address (details on previous page).

We will respond to your request within one month of its receipt. We will need to verify your identity before we can provide you with the information requested. If you are requesting information on another individual, we will need their prior consent to provide this information to you.