

MEDIATION BUCKINGHAMSHIRE PRIVACY POLICY

Our Privacy Policy explains:

- What information we collect and how we collect it
- Why and how we use your information.
- How long we keep your information
- How we may share your information
- Your rights on the information we hold about you
- Security-How we keep your information safe
- Changes to this Privacy Policy
- How to Contact Us

Our Data Controller is Rita Jackson.

Information We Collect

In order to provide our services and for the other purposes set out in Use of Information below, we may collect and process Personal Data from you. We may collect the following information:

- Personal information (for example, your name, email address, mailing address, phone numbers, date of birth and address)
- Sensitive Personal Data such as information about the reasons why you are seeking our services and information which is relevant to the concerns and interests you have raised.
- Financial Information if your mediation is about financial and/or property matters
- Attendance information (such as attended, number of absences and absence reasons)
- Safeguarding records
- Feedback from service users to enable us to monitor and improve our services

From time to time and as permitted by applicable law(s), we may collect Personal Data about you and update any existing Personal Data that we currently hold from other third-party sources

Our funders require us to ensure we collect information about the diversity of our service users however this is collected and stored in anonymised format and will not be linked with your personal data.

We collect your information from ...

- Self-referral Forms on our websites
- Referrals from the person requesting mediation or their authorised representative
- Telephone conversations, emails and written and verbal communications and from records of any sessions
- Third party referrers who have consent or other legitimate authority to contact us for the purposes of trying to arrange mediation

Your responsibility to inform us of changes

In order for us to comply with our duty to maintain up to date and accurate records, please keep us informed of any changes to your personal data.

How we use Information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data:

- to perform our obligations under an agreement (either verbal or written) to provide you with services
- to comply with a legal obligation; and
- where it is necessary to carry out our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your information.

Our legitimate interests may include processing Personal Data for the purposes of ;

- Providing our services to you,
- Responding to your requests and inquiries,
- Complying with our contract with you or another person
- Improving our services, for example, requesting your participation in surveys, or other initiatives which help us to gather information used to develop and enhance our services,
- Compliance with applicable law(s) (for example, to comply with child or adult safeguarding requirements, a search warrant or court order) or to carry out professional ethics/conduct investigations,
- Enabling us to provide, to maintain our own accounts and records and to support and manage our employees.

Mediation Buckinghamshire will not sell or give your information to others for commercial purposes

Sharing and Disclosure to Third Parties

We may disclose your Personal Data to third parties from time-to-time under the following circumstances:

1. You request or authorise the disclosure of your personal details to a third party.
2. The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant or court order).
3. The information is provided to service providers who perform functions on our behalf. These may include;
 - Professional advisors acting as processors or joint controllers including lawyers, bankers, auditors, insurers and professional consultants based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
 - Legal and compliance regulators acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances such as HM Revenue & Customs
 - Technology providers who assist in the development and management of our web properties
 - Hosting providers for the secure storage and transmission of your data

We do not discuss what takes place in mediation with parties' lawyers or other representatives without the consent of both parties. We only provide information to referrers about whether it has been possible to meet with or mediate with referred clients we do not provide further information without your consent.

Parents and Children

If the person about whom we are holding information is below 14 then we will need to seek consent from the parent or legal guardian if consent is required. Once the person reaches 14, we may also need to seek consent from them.

Your Legal Rights

You have the following legal rights in relation to your personal data:

Access your Data	you can ask for access to and a copy of your personal data and can check we are lawfully processing it
Correction	you can ask us to correct any incomplete or inaccurate personal data we hold about you
Erasure	<p>you can ask us to delete or remove your personal data where:</p> <ul style="list-style-type: none">(a) there is no good reason for us continuing to process it;(b) you have successfully exercised your right to object (see below);(c) we may have processed your information unlawfully; or(d) we are required to erase your personal data to comply with local law. <p>We may not always be able to comply with your request for specific legal reasons, which will be notified to you at the time of your request.</p>
Object	<p>you can object to the processing of your personal data where:</p> <ul style="list-style-type: none">(a) we are relying on our legitimate interest (or those of a third party) as the basis for processing your personal data, if you feel it impacts on your fundamental rights and freedoms; <p>In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms and in such circumstances, we can continue to process your personal data for such purposes.</p>

<p>Restrict Processing</p>	<p>you can ask us to us to suspend or restrict the processing of your personal data, if:</p> <p>(a) you want us to establish the accuracy of your personal data;</p> <p>(b) our use of your personal data is unlawful, but you do not want us to erase it;</p> <p>(c) you need us to hold your personal data (where we no longer require it) as you need it to establish, exercise or defend legal claims; or</p> <p>(d) you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.</p>
<p>Request a Transfer</p>	<p>you can request a transfer of your personal data which is held in an automated manner and which you provided your consent for us to process such personal data or which we need to process to perform our contact with you, to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format.</p>

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to:

The Data Controller Mediation Buckinghamshire, 1st Floor 45-47 Oxford Road, High Wycombe, Bucks, HP11 2EB.

You have the right to make a complaint at any time to the ICO (www.ico.org.uk) about how we have dealt with your data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

How long will we keep your information?

Upon closing a case, our files are reviewed and we will keep only as much information as it reasonably required for us to discharge our professional, contractual and legal obligations. We do not retain copies of documents provided by clients but may keep correspondence with clients in case of later queries.

Data destruction policy

Data about persons referred to us but not engaging with the service

Contact details and referral forms for persons referred to the service but unable to contact – 1 year after the last contact

Contact details, referral and visit report forms for persons referred to the service but declined services or did not attend first appointment – 1 year after the last contact

Data about persons engaging with the service

Neighbour and Room To Talk Mediation – 1 year after the case is closed

Civil, workplace and financial and property mediation – 6 years after the case is closed

Safeguarding records – service users referred to Social Services or the Police – 9 years

Complaints records – 6 years

Other information

Invoicing and accounting information – 6 years

Information security

We are working to protect your personal information that we hold, its confidentiality, integrity and availability.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Staff and Consultants subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- We have a Security Information Policy in place which defines the measures we take to protect your personal information. We use a combination of technology and procedures to ensure that our paper and computer systems are protected, monitored and are recoverable.
- We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We will work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes

Our Privacy Policy may change from time to time. Our data collection and destruction policy is subject to ongoing review and may be amended to comply with future amendments to regulations and guidance.

We will not reduce your rights under this Privacy Policy without your explicit consent.

How to Contact Us

If you have any enquiries regarding your data or this policy or wish to exercise your rights please contact:

The Data Controller, Mediation Buckinghamshire, 1st Floor 45-47 Oxford Road, High Wycombe, Bucks, HP11 2EB