



Choices & Voices

Privacy Notice

General Data Protection Regulations (GDPR) came into force on 25 May 2018, there are no exceptions and as such all organisations must comply.

This privacy notice is designed to help you understand how and why Choices and Voices processes your personal data.

Who are we?

Choices and Voices are an independent organisation providing services to Local Authorities. We also work alongside charities, Solicitors, Courts and government organisations to provide the following services on a commissioned basis:

- Independent Auditors
- Independent Investigating Officers
- Independent Safeguarding Chair's
- Independent Fostering/Adoption Chair's
- Independent Disciplinary Investigations
- Independent Court Assessments
- Independent Specialist Training
- Independent Recruitment
- Independent Locum Managers/Consultants

Choices and Voices are committed to the effective delivery of conducting unbiased, transparent and thorough independent audits, investigations, training within Safeguarding to promote better outcomes for children and their families.

We aim to continue to be transparent, respectful and enhance accountability of any work undertaken to ensure this is completed confidentially, professional and within a timely manner.

Using information shared with us by local authorities, is a key element of the work we do to undertake independent audits and investigations. As a part of a contract, Choices and Voices are the "data processor" and the purchasing local authority are the "data controller".

This privacy notice is to help our clients understand what information is shared with us and how we process it.

Who is the data controller?

The data controller for any information used as part of commissioned work (for example statutory complaints) will be the purchasing local authority. Choices and Voices are the data processor. Any Subject Access Requests (SAR) should be made to the relevant local authority.

How do we store your personal information?

All company data is securely held with the Microsoft 365 platform, protected by use of strong passwords and MFA, with all data residing in Microsoft Data Centres located in the UK. Further information on how Microsoft further protect the storage of such data – using encryption in data transit and at rest, please see Microsoft’s dedicated GDPR and Privacy website for further details: <https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-faqs>

Who do we share this information with?

Your data may be shared with a number of agencies involved within the process of our investigation / audit, but only those relevant to the work that has been commissioned by the purchasing local authority. No personal information is shared with third parties.

How long do we keep your information for?

Choices and Voices follow a retention policy whereby all information shared and used as part of a commissioned piece of work, will be deleted after 3 months following the full and final completion of this work. Additionally, work completed during this process, is saved only in electronic format and no paperwork will be retained.

What is our lawful basis for processing your information?

The work undertaken by Choices and Voices requires us to undertake in-depth audits and assessments as commissioned by our clients, as a result information is obtained via clients and interviews with relevant individuals to facilitate us to complete our investigations. It is the organisation whom we are commissioned by that provide the authority for us to view information, such as the Local Authority. Work conducted on behalf of children’s services for example would generally come under the Children’s Act 1989 with them being the data controller, sharing relevant information with Choices and Voices only for the purposes of the work undertaken.

The Participating Authorities are subject to the FOIA and the EIR (“the Acts”). As part of the Participating Authorities’ duties under the Acts, they may be required to disclose Information forming part of any Contract or Commissioned work, to anyone who makes a request. The Purchasing Authority has absolute discretion to apply or not to apply any exemptions/exceptions under the Acts.

What are your rights as a subject?

Individuals have the following rights under GDPR:

- To be informed – Individuals will be informed about our use of personal data via this policy document.
- Access (Subject access) – we will make available/erase any data held on an individual where they make a valid formal Subject Access Request – requests will be responded to within 28 days and will have no cost implications on the applicant. Any requests relating to work commissioned by local authorities will be made to that relevant local authority.
- Rectification – Any inaccurate or incomplete personal data will be rectified within 28 days of being notified.
- Erasure – Individuals have the right for any information about them to be removed or erased whereby there is no reason for its continued use.

- Restriction of processing – Individuals have the right to suppress the processing of their personal information, an example of this would be if the information is found to be inaccurate.
- Data portability – Individuals have the right to obtain and reuse their data for their own purposes. Choices and Voices will make this information available within 28 days of a valid request – see Access above.
- Objections – Individuals have a right to object to their information being used for direct marketing or processing for historical research or statistics. Choices and Voices does not use personal information for this purpose.
- Automated Decision Making – Choices and Voices does not use personal information for this purpose.

Data Breaches

Choices and Voices will keep a record of all data breaches. In the event of a data breach, we will contact all relevant parties to inform them of the nature and scale of the breach. We will also limit the disclosure of data to the minimum.

Any data breaches resulting in a risk to the rights and freedom of individuals, will be notified to the Information Commissioners Office (ICO).

Data Protection Responsibilities:

Michelle Sanderson

Data Processor(s)

Independent Investigating Officer

Independent Person

Independent Reviewer

Independent Auditor

Data Protection Officer - Ellie Dewar

Author: Michelle Sanderson

Co author Ellie Dewar

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