



# Independent Volunteer (IV) Handbook

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## **Welcome to Reconstruct**

Independent Volunteers 'IV's are expected to comply at all times with the Company policies & procedures, conduct and all other matters within the Handbook, and operating procedures applicable to the areas in which you work.

### **Equality, Diversity and Inclusion**

Everyone is Welcome, we are an equal opportunities employer and actively support human rights and all equality legislation and promote diversity and inclusion throughout the company. Our ethos is to respect and value people's differences, and to help everyone achieve more at work as well as in their personal lives so that they feel proud of who they are and of the part they play in our success.

We believe that all decisions about people at work should be based on the individual's abilities, skills, performance and behaviour and our business requirements. We accept our legal obligations under the Equalities Act 2010, which makes it generally unlawful to discriminate directly or indirectly in recruitment, employment or after employment on the grounds of:

- Age.
- Disability.
- Gender Reassignment.
- Marriage & Civil Partnership.
- Pregnancy and Maternity.
- Race (which includes colour, nationality and ethnic or national origins).
- Sexual orientation.
- Sex.
- Religion or belief.

We expect everyone in our team to adhere to our policy. Any form of discrimination, abuse or harassment will result in disciplinary action being taken, including dismissal for serious cases. The policy will also be drawn to the attention of clients/subcontractors/visitors.

***For the full policy see Equality and Diversity policy***

### **Transgender IVs/Gender Reassignment**

If you inform us of any changes in your personal circumstances and/or intention to transition, we will discuss any support that may be required and adjustments that we could make to ensure that you are supported.

### **Names/Pronouns**

IVs will be addressed by the name and pronoun that they choose.

### **Complaints**

If you feel that you have been subjected to any form of harassment or discrimination, please raise this with management immediately. Should you require it, our formal grievance procedures ensure sympathetic handling, and hopefully satisfactory resolution, for all aspects of IV's concerns or dissatisfaction.

### **Conduct**

We take pride in fostering good relationships with our clients and associates, and we expect a level of professionalism, integrity and honesty to be reciprocated by all IVs, by adhering to policies and procedures and also by demonstrating fairness, a respect for diversity, open communication and being ethical when conducting business.

### **Dress Code**

The dress code varies by roles and workplaces, therefore IVs should check with management what is appropriate to wear. However, if you are not sure we ask you to wear appropriate business dress when meeting clients on or off-site. Equally, if there are clients visiting the office, you may also be asked to dress appropriately and let your colleagues know in advance.

### **Social Media**

Any social media produced in the Company name must be approved by Head of service and/or management. It must reflect our values and be in our best interests, be grammatically correct, accurate, objectively justifiable, reasonable and appropriate.

Under no circumstances are you allowed to communicate or be friends with any service user on any social media platform. The only forms of communication you should use are via company email, text messages or phone calls using the company's mobile phone only.

### **Company and personal property**

The Company will take appropriate action to ensure the safety of property, however staff are responsible for the care and safety of any property belonging to the Company that is under their control and/or in their possession. Any personal property that is on Company premises is the IV's sole responsibility. The Company accepts no responsibility for loss, damage or theft of personal property.

### **Smoking Policy**

The Company has a no smoking or vaping policy throughout all premises, vehicles and in the company of all service users. Smoking on company premises is only allowed in designated smoking areas.

Failure to comply will be deemed an act of gross misconduct, an environmental health and safety risk.

### **Alcohol & Drugs**

Any misuse or abuse of alcohol and drugs presents a serious problem in the workplace. Staff are prohibited from being under the influence of and taking alcohol, illegal or non-prescribed drugs or affected by the abuse of solvents or similar substances before and during working hours. For the avoidance of doubt, working hours include meals and other breaks.

The consumption of alcohol at any establishment during working hours is forbidden, unless under exceptional circumstances and authorised by the relevant director.

IVs must not be involved in any transaction in connection with the handling, possession, sale or purchase of illegal drugs nor should illegal drugs be brought on to Company premises.

If IVs suspect or know that they or a colleague has an alcohol or drug related problem, they are encouraged to seek help and treatment voluntarily.

***For the full policy see Substance Misuse policy***

### **Special Circumstances**

If IVs attend social business/client functions outside of working hours and are representing the Company, we accept that moderate amounts of alcohol may be consumed. However, IVs should stay well within the legal limit if driving. Consuming drugs on these occasions is strictly forbidden.

Where IVs are taking medication for a pre-diagnosed condition, the type of drug and its possible contra-indications must be reported to their management. This sensitive information will be treated confidentially.

### **Criminal Offences**

IVs must notify management if they are convicted of a criminal offence or they receive a notice of court appearance for a criminal offence, giving details of the offence and any penalty.

### **Holiday**

**We request you let us know, with as much notice as possible, that you will be unavailable to work for any reason so we can ensure all IV's work is covered.**

### **Unexpected Absence**

When IVs are unexpectedly unable to report for work, for example due to sickness, we request you notify management at your earliest opportunity.

### **Health and Safety at work**

The Health and Safety at Work etc Act 1974 is the primary piece of legislation covering occupational health and safety in Great Britain. It sets out general duties which:

- employers have towards IVs and members of the public
- IVs have to themselves and to each other

The company have a duty to ensure that your work does not harm you or cause you to become ill. The company has carried out a Risk Assessment for your work and work place where appropriate – you should read this and if you have any concerns that inadequate precautions are putting anyone's health and safety at risk you must report this.

You have a duty to take reasonable care of your own and other people's health and safety, and to co-operate with the company on any health and safety matters.

***For the full policy see Health and Safety policy and guidance***

### **Office Working**

It is everyone's responsibility to prevent the theft or damage of goods, Company property or resources from the business and protect their own and others health and safety.

The security rules are designed to minimise the risks of loss and your fullest co-operation in implementing, maintaining and improving our procedures is required. These rules and procedures are also designed to protect you. Failure to follow the rules may, on its own, lead to the inference that you have acted dishonestly.

We may use a variety of security and surveillance techniques for the protection and management of the business and its IVs, including monitoring communication, CCTV cameras and search. These are also outlined in our Privacy policy of which you should have a copy.

V-2.2018 If you notice anything suspicious, report it to management as soon as possible. Any suggestions for improvements in the security procedures are always most welcome – these should be taken up with management in the first instance.

### **Right of Search**

In the interests of security, we reserve the right of search. Searches of IVs, their bags, other possessions, and vehicles may take place from time to time. You may, if you wish, be accompanied

by a colleague during the search. If you refuse to allow yourself or possessions to be searched, without reasonable explanation wrongdoing could be assumed.

### **Personal Property**

Please do not bring valuables or large sums of money to work with you as we cannot accept responsibility for your money, clothing or other property on our premises.

### **Building Security**

Whilst in the office, IVs should report any security-related incidents, be aware of anyone trying to gain access to areas they shouldn't, and ensure that windows, doors, cabinets and cupboards are locked when unoccupied.

### **Resolving Problems**

We believe that by having clear, open and fair procedures for the resolution of problems, we create a basis for the fair treatment of all our team.

### **Bullying and Harassment**

The Company actively encourages an environment in which everyone is entitled to work without harassment, victimisation and bullying.

Harassment may be described broadly as 'unwanted conduct affecting the dignity of people'. Where a particular form of conduct has the effect of making a person feel humiliated, threatened or that their privacy is being invaded, that conduct will constitute harassment and should cease immediately.

We will not condone harassment and the procedure for dealing with complaints is set out below.

The policy applies to IVs' conduct in or out of office hours, when entertaining clients or at work events.

All IVs have a responsibility to comply with this policy and treat all colleagues with dignity and respect. If you believe that you have been subject to, or have witnessed harassment, victimisation or bullying, you must inform your management or HR so that we can keep our workplace free from unacceptable behaviour.

### **Risk Assessment Policy and Procedure**

Reconstruct recognises that some degree of risk taking can be beneficial to individuals and to organisations. We believe in keeping staff and service users safe but also in creating opportunities to face and overcome challenges and to stimulate creative thinking and working. It is the responsibility of managers to 'manage' risks as opposed to avoiding risks. Allowing young people to take risk can improve self-esteem and raise confidence and we support a balanced approach to risk.

Risk Assessment is the process undertaken to analyse levels of risk. From this process, actions can be identified, and measures put in place to minimize risk of harm.

### **Safeguarding Policy**

We work to improve the lives of vulnerable children and young people and keeping children safe lies at the heart of everything we do as individuals and as an organisation. We understand that Safeguarding is **everyone's responsibility**.

***For the full policy see Safeguarding policy***

## Information Sharing

Reconstruct have a robust information sharing strategy which forms part of our induction with the organisation and our policy is based on government guidance and our own policies and procedures.

***For the full policy see Information sharing***

**For other associated policies with the company see**

- Quality assurance for IV and Advocacy service
- Modern Slavery policy
- Mental Capacity policy
- Children at risk of Child Sexual Exploitation (CSE)
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## Data Protection Policy

The security and privacy of your data is taken seriously by the Company, but we need to gather and use information, or 'data', about you as part of our business and to manage our relationship with you. The Company is a 'data controller' for the purposes of your personal data. We are committed to complying with all our data protection legal obligations regarding how we obtain, handle, process or store personal data.

Our Data Protection policy applies to current and former IVs, workers, volunteers, interns, apprentices and consultants. If you fall into one of these categories, you are a 'data subject' for the purposes of this policy. You should read this policy alongside your contract of employment (or contract for services), our Privacy Notice, IT policy and any other notice we issue to you from time to time in relation to your data. Any breach of this policy may result in disciplinary action being taken up to and including dismissal.

We have separate policies and Privacy Notices issued in respect of customers, suppliers and other categories of data subject. A copy of these can be obtained from the person responsible for data in the Company.

We have taken steps to protect the security of your data in accordance with our Data Protection policy. We train staff about their data protection responsibilities as part of the induction process. We will only hold data for as long as necessary for the purposes for which we collected it. This policy does not form part of your contract of employment (or contract for services, if relevant) and can be amended by the Company at any time.

## Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection principles'. It must be:

- Processed fairly, lawfully and transparently.
- Collected and processed only for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- Accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay.
- Not kept for longer than is necessary for the purposes for which it is processed.
- Processed securely.

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## How we define personal data

'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to

come into our possession. Personal data includes any expression of opinion about the person and an indication of the intentions of us or others in respect of that person. It applies to data stored electronically, on paper or other materials, but does not include anonymised data.

The types of personal data we collect and use about you is included in the Privacy Notice that is issued with your contract of employment.

### **Special categories of personal data**

These may be processed for monitoring equal opportunities, managing your absence or complying with deductions from payroll, among other reasons. Schools, companies with DBS requirements & other exceptions.

These categories are defined below and are detailed in your Privacy Notice:

- Your racial or ethnic origin.
- Your political opinions.
- Your religious or philosophical beliefs.
- Your trade union membership.
- Your genetic or biometric data.
- Your health.
- Your sex life and sexual orientation.
- Any criminal convictions and offences.

### **How and Why We Process Your Data**

'Processing' the data that we hold includes collection, recording, organisation, structuring or storage, adapting, retrieving, disseminating, aligning and also removing or erasing it.

The Company will process your personal data if it is needed to perform the contract of employment (or services) between us or to comply with any legal obligation, or if it is necessary for our legitimate interests (or for the legitimate interests of someone else). The Privacy Notice covers the reasons for collecting and processing your data, and when and who we share it with. We can process your personal data for these purposes without your knowledge or consent. However, we will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it. We will only process special categories of your personal data in certain situations in accordance with the law.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

### **Sharing Your Personal Data**

Sometimes we might share your personal data with group companies or our business partners, contractors and agents in order to carry out our obligations under our contract with you or for our legitimate interests; these parties are required to hold data legally and confidentially. These parties are detailed in your Privacy Notice.

Employer to confirm whether data will be sent outside the EU and if so what protections are included. If this changes, you will be notified of this and the protections which are in place to protect the security of your data will be explained.

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### **How You Should Process Personal Data for the Company**

Everyone who works for, or on behalf of, the Company has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this policy and the Company's IT policy.



You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of, the Company and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained and follow the following principles:

- Do not share personal data informally; keep it secure and don't share it with unauthorised people.
- Regularly review and update personal data which you have to deal with. Update us if your own contact details change.
- Do not make unnecessary copies or keep personal data. Dispose of any copies securely.
- Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
- Do not transfer personal data out of the European Economic Area except in compliance with the law and with authorisation of the person responsible for data in the Company.
- Lock drawers and filing cabinets. Do not leave papers with personal data lying about.
- Do not take personal data away from Company premises without authorisation.
- Ask for help from the person responsible for data in the Company if you are unsure about data protection or the IT Policy, or if you notice any areas we can improve upon.

### **How to Deal with Data Breaches**

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur, please inform Data Protection Officer immediately and keep any evidence you have in relation to the breach. We will take the appropriate action.

***For the full policy see Data Protection policy***

### **Subject Access Request (SAR)**

Data subjects can make a 'Subject Access Request' ('SAR') to find out the information we hold about them. If you would like to make a SAR in relation to your own personal data, you should make this in writing by completing the SAR form in appendix I. We will comply with all legal requirements. If you receive a SAR, please pass it on to the person responsible for data and ensure that you keep any information regarding it.

### **Your Data Subject Rights**

The law provides clear rights with regard to your data protection; a full list can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations, and also on the route for you to make a complaint. The following are the key, but not exhaustive, list of rights:

- The right to information about what personal data we process: how and on what basis.
- The right to access your own personal data via a SAR.
- The right to correct any inaccuracies in your personal data, by contacting the person responsible for data in the Company.
- The right to request that we erase your personal data where we were not entitled under the law to process it – or where it is no longer necessary to process it for the purpose it was collected – and have access temporarily restricted. To do this, you should contact the person responsible for data in the Company.
- The right to object to data processing where we are relying on a 'legitimate interest' to do so, and you think that your rights and interests outweigh our own and you wish us to stop; or for use in direct marketing.
- The right to receive a copy of your personal data and to transfer your personal data to another data controller.
- The right to be notified of a data security breach concerning your personal data.

- The right not to give your consent for processing of personal data, or to withdraw this later by contacting the person responsible for data in the Company.

**Review**

The Company's data protection officer is responsible for reviewing this policy. You should direct any questions in relation to this policy or data protection to this person and address any written requests to them.

## Appendix I Privacy Notice

The Company collects and processes personal information, or personal data (in electronic or paper format), relating to its workforce (this covers the following categories: IVs, casual workers, agency workers, and contractors) to manage the working relationship. This privacy notice uses the collective term “workforce” to cover all these categories unless specified.

The Company is committed as data controller, to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information both during and after your working relationship with the Company. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to the company’s current and former workforce. It is non-contractual and does not form part of any contract or agreement.

If you have any questions about this privacy notice or about how we handle your personal information, please contact us.

The Company has appointed an external data protection officer to oversee compliance with this privacy notice. If you feel that there are any problems in connection with how we collect or use your personal information please contact our data protection officer on

You also have the right to contact the Information Commission (the regulatory body who ensures that organisations process personal information fairly) about any problems you encounter.

### What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn’t include anonymised data, i.e. where all identifying particulars have been removed.

The Company collects, uses and processes a range of personal information about you. This includes (as applicable):

- your contact details, including your name, home address, personal telephone number and personal e-mail address (for agency workers, only name)
- your emergency contact details/next of kin/and where applicable, beneficiary for any death in service payment (not for agency workers)
- your date of birth (not for agency workers)
- your gender
- your marital status (not for agency workers)
- the start and end dates of your employment or engagement
- personal information included in the records pertaining to your recruitment
- the terms and conditions of your employment or engagement (including your job title and working hours), as set out in a job offer letter, employment contract, written statement of employment particulars, casual worker agreement, self-employed contract for services, assignment note, pay and honorarium letters, change in details forms, statements of changes to employment or engagement terms and related correspondence (not for agency workers)
- details of your skills, qualifications, experience and work history, both with previous employers and with the Company
- your professional memberships where applicable

- employment references
- background checks where an IV has worked in an adult or child care setting
- your birth certificate
- your passport details (not for agency workers)
- your salary, entitlement to benefits and pension information (not for agency workers or contractors)
- your National Insurance number (not for agency workers or contractors)
- your bank account details, payroll records, tax code and tax status information (not for agency workers)
- evidence of your self employed status and professional indemnity insurance certificates (for contractors only)
- any disciplinary, grievance and capability records, including investigation reports, collated evidence, minutes of hearings and appeal hearings, warning letters, performance improvement plans and related correspondence (not for agency workers or contractors)
- appraisal, including appraisal forms, performance reviews and ratings, targets and objectives set (not for agency workers or contractors)
- training records
- annual leave and other leave records, including details of the types of and reasons for leave being taken and related correspondence (not agency workers or contractors)
- any termination of employment or engagement documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings and related correspondence
- information about your use of our IT systems, including usage of telephones, e-mail, the Internet and the company's own intranet
- DBS Certificate Number and documentation to do with overseas criminal record checks (where applicable)
- driving licence details where applicable (not for agency workers)
- absence records (not agency or contractors)
- other personal information included in the records pertaining to your recruitment

We will also collect additional personal information throughout the period of your working relationship with us. This may be collected in the course of your work-related activities. Whilst some of the personal information you provide to us is mandatory and/or is a statutory or contractual requirement, some of it you may be asked to provide to us on a voluntary basis. We will inform you whether you are required to provide certain personal information to us or if you have a choice in this.

### **How do we collect your personal information?**

The Company may collect personal information about its workforce in a variety of ways. We collect personal information from other external third parties, such as:

- references from former employers (not contractors)
- criminal record checks (from government bodies) with or without the assistance an external government-accredited agency (where applic)
- your medical/health information from your GP from our occupational health provider (not for agency workers or contractors).
- driving licence information from government bodies (such as DVLA) (not for agency workers)
- professional conduct information from professional bodies where applicable
- driving insurance information from our insurers and brokers where applicable (not for agency workers or contractors).

## Why and how do we use your personal information?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- where we need to do so to perform the contract or agreement we have entered into with you
- where we need to comply with a legal obligation
- where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: performing or exercising our obligations or rights under the direct relationship that exists between the Company and you; pursuing our business by employing (and rewarding) the workforce; performing effective internal administration and ensuring the smooth running of the business; ensuring the security and effective operation of our systems and network; protecting our confidential information; and conducting due diligence on its workforce.

We believe that you have a reasonable expectation, as a member of our work force, that we will process your personal information.

We may also occasionally use your personal information where we need to protect your vital interests (or someone else's vital interests). An example of a vital interest might be a medical emergency which requires the disclosure of a medical condition to a qualified first aider.

The purposes for which we are processing, or will process, your personal information are to:

- enable us to maintain accurate and up-to-date records and contact details (including details of whom to contact in the event of an emergency)
- assess your suitability for promotion or transfer within the company
- comply with statutory and/or regulatory requirements and obligations, e.g. safeguarding (if applicable) and checking your right to work in the UK, inspection by regulatory authorities
- comply with the duty to make reasonable adjustments for disabled individuals in our workforce and with other disability discrimination obligations
- maintain an accurate record of your employment or engagement terms
- administer the contract we have entered into with you (for agency workers, your agency)
- provide mortgage references
- visit your home for welfare visits
- ensure compliance with your statutory and contractual rights
- ensure you are paid correctly and receive the correct benefits and pension entitlements, including liaising with any external benefits or pension providers or insurers where applicable (not for agency workers or contractors)
- ensure compliance with income tax requirements, e.g. deducting income tax and National Insurance contributions where applicable (not for contractors or agency workers)
- operate and maintain a record of disciplinary, grievance and capability procedures and action taken (not for contractors or agency workers)
- operate and maintain a record of performance management systems
- record and assess your education, training and development activities and needs (not for contractors or agency workers)
- plan for career development and succession (not for contractors or agency workers)
- manage, plan and organise work
- enable effective workforce management

- operate and maintain a record of annual leave procedures (not for contractors or agency workers)
- operate and maintain a record of sickness absence procedures (not for contractors or agency workers)
- ascertain your fitness to work (not for contractors or agency workers)
- operate and maintain a record of maternity leave, paternity leave, adoption leave, shared parental leave, parental leave and any other type of paid or unpaid leave or time off work (not for contractors or agency workers)
- ensure payment of SSP or contractual sick pay (not for contractors or agency workers)
- ensure payment of other statutory or contractual pay entitlements, e.g. maternity pay, paternity pay, adoption pay and shared parental leave pay (not for contractors or agency workers)
- meet our obligations under health and safety laws
- make decisions about continued employment or engagement
- operate and maintain a record of dismissal or disengagement procedures
- provide references on request for current or former members of our workforce
- prevent fraud
- monitor your use of our IT systems to ensure compliance with our IT-related policies
- ensure network and information security and prevent unauthorised access and modifications to systems
- ensure effective HR and business administration, including accounting and auditing
- ensure adherence to Company rules, policies and procedures
- monitor equal opportunities
- enable us to establish, exercise or defend possible legal claims
- compile KPI's and other HR-related statistics

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Your personal information may be stored in different places, including in your personnel file, our HR systems and in other IT systems, such as the e-mail system and payroll systems.

Certain personal information may need to be renewed on a regular basis during the course of your employment or engagement with us.

### **What types of sensitive personal information do we collect about you?**

There are also “special categories” of personal information, and personal information on criminal convictions and offences and on your health, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

V-2 2023 We may collect sensitive personal information throughout the period of your working relationship with us. This may be collected in the course of your work-related activities as a result of statutory or contractual requirements, some of it you may be asked to provide to us on a voluntary basis. We will inform you whether you are required to provide certain sensitive personal information to us or if you have a choice in this.

### **How do we collect your sensitive personal information?**

The Company may also collect, use and process the following special categories of your personal information (as applicable):

- information about your health, including any medical condition, whether you have a disability in respect of which the Company needs to make reasonable adjustments, sickness absence records (including details of the reasons for sickness absence being taken), medical reports and related correspondence (not for agency workers or contractors)
- information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation (not for agency workers or contractors)
- trade union membership (not for agency workers or contractors)
- information about criminal convictions and offences.

### **Why and how do we use your sensitive personal information?**

We will only collect and use your sensitive personal information, which includes information about criminal convictions and offences, when the law allows us to.

Some special categories of personal information, i.e. information about your health or medical conditions and trade union membership, and information about criminal convictions and offences, is processed so that we can perform or exercise our obligations or rights under safeguarding law, (if applicable), employment law and in line with our data protection policy. Information about health or medical conditions may also be processed for the purposes of assessing the working capacity of an IV or a casual worker, and a medical diagnosis, provided this is done under the responsibility of a medical professional subject to the obligation of professional secrecy, e.g. a doctor, and again in line with our data protection policy.

The purposes for which we are processing, or will process, these special categories of your personal information, and information about any criminal convictions and offences, are to:

- comply with statutory and/or regulatory requirements and obligations (including safeguarding)
- comply with the duty to make reasonable adjustments for disabled members of our workforce and with other disability discrimination obligations
- administer the contract we have entered into with you
- ensure compliance with your statutory and contractual rights
- operate and maintain a record of sickness absence procedures
- ascertain your fitness to work
- manage, plan and organise work
- enable effective workforce management
- ensure payment of SSP or contractual sick pay (not for contractors or agency workers)
- meet our obligations under health and safety laws
- make decisions about continued employment or engagement
- operate and maintain a record of dismissal or disengagement procedures
- ensure effective HR and business administration
- ensure adherence to Company rules, policies and procedures
- monitor equal opportunities

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V-2 2000 Where the Company processes other special categories of sensitive personal information, i.e. information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities monitoring and the fulfilling of our duties under equality law, in line with our data protection policy.



We may also occasionally use your special categories of personal information, and information about any criminal convictions and offences, where it is needed for the establishment, exercise or defence of legal claims.

Your sensitive personal information may be stored in different places, including in your personnel file, our HR systems and in other IT systems, such as the e-mail system and payroll systems.

Certain sensitive personal information may need to be renewed on a regular basis during the course of your employment or engagement with us.

*From now on in this privacy notice, “your information” includes both your personal information and your sensitive personal information.*

### **What if you fail to provide your information?**

*If you fail to provide certain information when requested or required (or prohibit the company from accessing such information), we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory or contractual rights.*

### **Change of purpose**

We will only use your information for the purposes for which we collected it. If we need to use your information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain the legal basis which allows us to process your information for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

### **Who has access to your personal information?**

Your personal information may be shared internally within the Company, including with members of the HR department, payroll and finance staff, your management, other managers, senior managers/Directors and IT staff if access to your personal information is necessary for the performance of their roles.

The Company may also share your personal information with third-party external bodies (including service providers and their designated agents), including:

- government-approved external organisations for the purposes of conducting criminal and offence checks
- benefits providers and benefits administration, including insurers (not for contractors or agency workers)
- your GP (not for contractors or agency workers)
- our occupational health provider (not for contractors or agency workers)
- driving licence information from government bodies (such as DVLA) (not for agency workers)
- professional bodies where applicable
- insurers and brokers
- external IT services
- external auditors
- professional advisers, such as lawyers, accountants and brokers
- other statutory bodies
- associated companies
- companies with whom we have partnered for the purpose of improving our communications with you, developing applications, or improving the services we provide through the analysis and modelling of statistics/data



- shredding company (in paper form, although they do not catch sight of the content of this paperwork)
- archiving company (in paper form, although they do not catch sight of the content of this paperwork)

We may also need to share your personal information with a regulator or to otherwise comply with the law.

We may share your personal information with third parties where it is necessary to administer the contract we have entered into with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests (or those of a third party).

We may on occasion anonymise your personal information without your knowledge and share this with trusted third parties to help us develop our services (such as improving foster carer retention and placement matching) through the analysis and modelling of statistics/data. Anonymised information falls outside the scope of any relevant data protection laws and anonymisation of your data prevents you from being personally identified by those third parties.

### **Who has access to your sensitive personal information?**

Your sensitive personal information may be shared internally within the Company, including with members of the HR department, your management, other managers, senior managers/Directors and IT staff if access to your sensitive personal information is necessary for the performance of their roles.

The Company may also share your sensitive personal information with third-party external bodies (including service providers and their designated agents), including:

- your GP (not for contractors or agency workers)
- our occupational health provider (not for contractors or agency workers)
- professional advisers, such as lawyers
- other statutory bodies
- shredding company (in paper form, although they do not catch sight of the content of this paperwork)
- archiving company (in paper form, although they do not catch sight of the content of this paperwork)

We may also need to share your sensitive personal information with a regulator or to otherwise comply with the law.

We may share your sensitive personal information with third parties where it is necessary to administer the contract we have entered into with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests (or those of a third party).

We may on occasion anonymise your sensitive personal information without your knowledge and share this with trusted third parties to help us develop our services (such as improving foster carer retention and placement matching) through the analysis and modelling of statistics/data. Anonymised information falls outside the scope of any relevant data protection laws and anonymisation of your data prevents you from being personally identified by those third parties.

### **How does the Company protect your information?**

The Company has put in place measures to protect the security of your information. It has internal policies, procedures and controls in place to try and prevent your information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit

access to your information to those IVs, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our data protection officer.

Where your information is shared with external bodies (including third-party service providers), we require them to take appropriate technical and organisational security measures to protect your information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your information for specified purposes and in accordance with our written instructions and we do not allow them to use your information for their own purposes.

The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

### **For how long does the Company keep your information?**

The Company will only retain your information for as long as is necessary to fulfil the purposes for which it was collected and processed, and to protect the Company's legitimate interests including (a) the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of information for the establishment, exercise or defence of legal claims.

The Company will generally hold your information for the duration of your employment or engagement. The exceptions are:

- it will only be recorded whether a criminal record check has yielded a satisfactory or unsatisfactory result, unless, in exceptional circumstances, the sensitive personal information in the criminal record check has been risk assessed by the Company as relevant to the ongoing working relationship
- disciplinary, grievance and capability records will only be retained until the expiry of any warning given but not where (a) safeguarding incidents were proven or (b) a summary disciplinary, grievance or performance management record resulted in dismissal.

We will also require third parties to destroy or erase your information where applicable in accordance with the above conditions.

In some circumstances we may anonymise your information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

### **Your rights in connection with your information**

It is important that the information we hold about you is accurate and up to date. Please keep us informed if your information changes, e.g. you change your home address, during your working relationship with the Company so that our records can be updated. The Company cannot be held responsible for any errors in your information in this regard unless you have notified the Company of the relevant change.

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your information - this is usually known as making a data subject access request and it enables you to receive a copy of the information we hold about you and to check that we are lawfully processing it
- request rectification of your information - this enables you to have any inaccurate or incomplete information we hold about you corrected

- request the erasure of your information - this enables you to ask us to delete or remove your information where there's no compelling reason for its continued processing, e.g. it is no longer necessary in relation to the purpose for which it was originally collected.
- restrict the processing of your information - this enables you to ask us to suspend the processing of your information, e.g. if you contest its accuracy and so want us to verify its accuracy.
- object to the processing of your information - this enables you to ask us to stop processing your information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- data portability - this gives you the right to request the transfer of your information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact us. We may need to request specific information from you in order to verify your identity and check your right to access the information or to exercise any of your other rights. This is a security measure to ensure that your information is not disclosed to any person who has no right to receive it.

Please note that some of these rights are not absolute (i.e. they depend on the circumstances). We will let you know which of these rights do not apply at the time you make a request to exercise them.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

### **Transferring your information outside the European Economic Area**

The Company will not transfer your information to countries outside the European Economic Area. In the event that it does, the Company will inform you in writing.

### **Automated decision making**

Automated decision making occurs when an electronic system uses your information to make a decision without human intervention.

We do not envisage that any employment decisions will be taken about you based solely on automated decision making, including profiling. However, we will notify you in writing if this position changes.

### **Changes to this privacy notice**

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your information for a purpose other than that for which the information was collected or where we intend to process new types of information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your information in other ways.



### Appendix III Subject Access Request Form

This form is for use by any person making a request for disclosure of his/her personal data held; and/or a person authorised to make a request on behalf of another.

Request made to:	Name	Contact Details	Date

1. Details of the person requesting the information.	
Full name:	
Address:	
Telephone number:	
Email:	

2. Are you the Data Subject? (please tick as appropriate)
<input type="checkbox"/> Yes. If you are the Data Subject please supply evidence of your identity i.e. passport or driving license or birth certificate (or photocopy) and, if necessary, a stamped addressed envelope for returning the document (please go to question 5).
<input type="checkbox"/> No. Are you acting on behalf of the Data Subject with their written authority? If so, that authority must be provided before your request can proceed.

3. Details of the Data Subject (if different to 1.)			
Full name:			
Address:			
Telephone number:		Fax Number:	
Email:			

Please highlight which Subject Access Request you wish to invoke;

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Description:	Tick
<ul style="list-style-type: none"> <li>SAR 1: Right to be informed</li> </ul>	
<ul style="list-style-type: none"> <li>SAR 2: Right of Access</li> </ul>	

• SAR 3: Right to rectification	
• SAR 4: Right to erasure	
• SAR 5: Right to restrict processing	
• SAR 6: Right to data portability	
• SAR 7: Right to object	

4.	Please describe your relationship with the Data Subject that leads you to make this request for information on their behalf.
5.	Please state below which information you would like to see. Please be as specific as possible, e.g. specific meeting notes, timeframe for records etc.

**Declaration**

I ....., certify that the information given is true. I understand that it is necessary for the Company to confirm my/ Data Subject’s identity and that further information may be necessary before my request for data disclosure can be undertaken.

Signed ..... Date

Please tick to confirm you have enclosed the following:

- i evidence of your identity
- ii proof of address (if not contained on your ID) - i.e. utility bill issued within last 3 months
- iii evidence of the Data Subject’s identity (if different from above)
- iv evidence of Data Subject’s consent to disclose to a third party (if required as indicated above).

Please note that the Company reserves the right to withhold or redact some information (e.g. concerning third parties and/or some confidential information) in accord with Data Protection provisions that apply. Should this apply you will be informed of the reason(s).

Please send us the Subject Access Request Form either by email to  
**Leanne.McGowen@reconstruct.co.uk**

We will respond within 30 days of receipt to the given physical address by RECORDED DELIVERY.

It is UK Law to record a list of all Subject Access Requests. A copy of this form will be scanned and held for audit purposes of ICO Compliance in our secure storage for future reference.

Thank you for your requests.

**Office use only**

Request received by  
 (Name):.....Date.....

Being dealt with by (Name): .....Contact  
 details.....

Notes:  
 .....  
 .....  
 .....

Date request logged: on relevant subject's file: ..... Date logged on central SAR: .....

Signed: ..... Designation:  
 .....

**Appendix VI Risk Assessment Advocacy**

**Advocacy Visit Risk Assessment**

Date completed: Completed By:  
 Advocate Name: Advocate Contact Number:  
 Advocacy Case Number:

Date and time of visit:

Address of visit:

Type of Placement:

Contact Number of placement:

Overview of significant information:

Guidelines for the meeting: eg where will the meeting take place? Who will be present? (please list)

Journey Details

From: To:  
 Distance: Journey time:  
 Leaving time: Breaks in time: Arrival time:

*For every 2 hours of driving, you must calculate a short break of at least 15 minutes*

Please bullet point any significant information concerning potential physical, emotional or health issue risk(s) to worker. Please obtain knowledge from both written and verbal information provided e.g. from referral form/something said by young person/carer/social worker?

1) Please complete the following table to demonstrate strategies taken to manage r alleviate perceived risks.

Perceived risk	Strategy
	24

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2) Have you consulted with the children’s services manager about this risk assessment?



3) Please **either** state your reasons for not consulting with the children's services manager **or** note any agreed decisions as a result of this discussion:

4) Please provide dates that this risk assessment has been discussed with child or young person

- date discussed:

**\*Please ensure that relevant risks and strategies are included in any visitor, mentor or advocate agreements**

5) Please provide the date(s) that this risk assessment was given to the allocated children's worker.

- Date given:

Date this assessment will be reviewed (minimum annually): **Prior to any further scheduled visits**

**Signed:**

**\*Please ensure that there is a copy of this on the child or young person's file**

**For office use**

**Coordinator Name:**

**Date:**

**Comments/Notes:**

**Appendix VII Risk Assessment  
Risk Assessment**

Please complete **all** questions below, **expand** form as necessary:

**Child/young person’s name:**

**Date completed:**

6) Please bullet point any significant information concerning potential physical, emotional or health issue risk(s) to either worker or child. Please obtain knowledge from both written and verbal information provided *e.g. from referral form, carers information form, something said by young person, carer or social worker?*

- 
- 

7) Please complete the following table to demonstrate strategies taken to manage or alleviate perceived risks.

Perceived risk	Strategy

8) Have you consulted with the children’s services manager about this risk assessment?

- 

9) Please **either** state your reasons for not consulting with the children’s services manager **or** note any agreed decisions as a result of this discussion:

- 

10) Please provide dates that this risk assessment has been discussed with child or young person

- date discussed: -

**\*Please ensure that relevant risks and strategies are included in any visitor, mentor or advocate agreements**

11) Please provide the date(s) that this risk assessment was given to the allocated children’s worker.

- Date given:

Date this assessment will be reviewed (minimum annually):

**Signed:**

**\*Please ensure that there is a copy of this on the child or young person’s file**

## VERSION CONTROL

			Document Owner	Reconstruct Ltd
			Status	Active
			Next Review	30/10/2024
Version	Revision Date	Section Revised	Person undertaking Revision	Reason for Revision
V2_2023	30/10/24	All	AD	Review of policy, rebranding, and implemented version control mechanism opposed to having just date for next review