

Privacy Policy

Positive Smiles C.I.C.

Document control

Published Date:	03/12/2018	Author:	Shabir Siddiq – Director
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Version	Change Detail	Latest Review Date	Date of Next Review	Updated By:
1.1	Annual Review & Policy Amended	03/12/2019	03/12/2020	Shabir Siddiq
1.2	Annual Review & Policy Amended	03/12/2020	03/12/2021	Shabir Siddiq
1.3	Annual Review & Policy Amended	07/12/2021	07/12/2022	Shabir Siddiq
1.4	Annual Review & Policy Amended	07/12/2022	07/12/2023	Shabir Siddiq
1.4	Annual Review Changed to Academic Year Start	01/08/2023	31/07/2024	Shabir Siddiq
1.5	Annual Review and name change	01/08/2024	31/07/2025	Shabir Siddiq
1.6	Annual Review & header logos change	01/08/2025	31/07/2026	Shabir Siddiq
1.7	Annual review, Positive Smiles rebrand and realignment to adult services	01/08/2026	31/07/2027	Shabir Siddiq

PRIVACY STATEMENT

INTRODUCTION

Positive Smiles keeps a record for every participant. This contains the information we need to support you, plan activities that meet your needs and report on your progress. It is also used for our participant records and funder monitoring returns.

This information is under the control of Positive Smiles and we take seriously our role in storing and processing it on your behalf. Some of it may need to be shared with our funders and commissioners for monitoring and audit purposes.

WHAT PARTICIPANT DATA IS USED?

We store the following data for every participant:

- First Name
- Last Name
- Registration Number
- Sex
- Date of Birth
- Ethnicity
- Address and Postcode
- Telephone number
- Course or activity attended
- Progress and outcomes

LAWFUL BASIS

The lawful bases for processing your data are set out in Article 6 of the UK GDPR. Positive Smiles data collection and processing is based on the following:

(a) Consent: the individual has given clear consent to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

WHY IS YOUR DATA NEEDED?

Participant data is only used to support you and track your progress. Some of your data may be shared with our funders for monitoring purposes. We will not use participant data for any commercial purpose.

Ethnicity data is used to ensure that Positive Smiles provides equal opportunities to all the people we support.

SECURITY

We store participant data on a secure system. Staff are given passwords that protect access so that only authorised Positive Smiles staff can see your data. No third party can access it without permission.

RETENTION OF RECORDS

We keep personal data and participant files:

- For as long as is necessary to fulfil the purposes we collected it for.
- As required by law.
- To enforce or defend legal claims.

Sometimes we will keep information that you have deleted, for example messages sent by you to your tutor, as a record of your time with us. We will keep this information for a reasonable time.

ACCESSING YOUR PERSONAL DATA

If you wish to access personal data Positive Smiles holds about you under the Subject Access Request provision, please write to our Data Protection Lead.

COMPLAINTS

If you are concerned about how your personal information has been handled or processed, or feel any infringement has taken place, please contact the Positive Smiles Data Protection Lead in the first instance.

Positive Smiles Data Protection Officer – Shabir Siddiq

Tel: 01254 946444, email: info@positivesmiles.co.uk

You have the right to raise a complaint with the Information Commissioners Office (ICO), details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Or you could visit the ICO website and follow the online process. Website address below:

<https://ico.org.uk/make-a-complaint/>

STATUS OF THIS POLICY AND NEW INSTRUCTIONS

This policy is for general purposes only and does not grant any contractual rights as such. Positive Smiles reserves the right to amend this policy from time to time, although we will notify you in writing of any changes.

Signed by the Director



01/08/26