

This is Outcomes First Group Ltd's statement of processing required under **Article 30 of the UK GDPR**.

For the purposes of this statement, 'Processing' means collection, recording, organising, structuring or storing, adapting or altering, retrieving, consulting or use, disclosing by transmission, disseminating or otherwise making available, aligning or combining, or restricting, erasing or destroying personal data.

## ORGANISATION'S NAME AND CONTACT DETAILS

Outcomes First Group Ltd  
Atria, Spa Road, Bolton, Lancashire, BL1 4AG

**ICO Registration:** All subsidiary companies of the Outcomes First Group that process personal data are registered with the ICO. Details of individual company registrations are available from the [ICO Register](#) online or upon request to [data.protection@ofgl.co.uk](mailto:data.protection@ofgl.co.uk)

**Data Protection Officer:** Christopher Duffy ([chris.duffy@ofgl.co.uk](mailto:chris.duffy@ofgl.co.uk))

**Data Protection Team:** 01789 767800 (option 6) / [data.protection@ofgl.co.uk](mailto:data.protection@ofgl.co.uk)

### Joint Controllers

- Various companies within the Outcomes First Group of Companies
- Various Local Authorities and or CCGs for selected records applying to specific people we support – contact details for each local authority or CCG are available upon request

## PURPOSES OF THE PROCESSING

We process personal information in the following ways to enable us to provide care, education and therapeutic services for children, young people and adults with autism, complex needs, learning disabilities and social, emotional and mental health difficulties in accordance with all relevant Regulations.

- Provision of care, education and clinical support services
- Maintaining our own accounts and records
- Supporting and managing our employees, workers and contractors
- Regulatory activities
- Use of CCTV
- Internal financial support and corporate functions
- Managing archived records
- Management of information technology systems
- Information and databank administration
- Occupational health and welfare
- Produce and distribute printed material
- Management of public relations, journalism, advertising and media
- Sending promotional communications about the services we provide
- Marketing
- Compliance with legal obligations
- Safeguarding
- Legal Proceedings
- For the purposes of assisting Law Enforcement

## CATEGORIES OF INDIVIDUALS

We process personal information about:

- Customers (People We Support), including students
- Suppliers
- Staff, workers, persons contracted to provide a service and foster carers
- Complainants, enquirers or their representatives
- Professional advisers and consultants
- Carers or representatives, including family members of those we support
- Representatives of other organisations
- Commissioner representatives

## CATEGORIES OF PERSONAL DATA

We process information relevant to the above reasons/purposes, which may include:

- Personal details
- Family details
- Lifestyle and social circumstances
- Financial details
- Employment and education details
- Visual images, personal appearance and behaviour
- Student and pupil records
- Training records

We also process sensitive classes of information that may include:

- Physical or mental health details
- Racial or ethnic origin
- Medical Information
- Criminal Convictions

## CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Where allowed or required by Law, we may share information with:

- Customers (People We Support), including students
- Family, guardians or representatives of the person whose personal data we are processing
- Current past and prospective employers
- Healthcare, social and welfare organisations and professionals
- Educators and examining bodies
- Providers of goods and services
- Financial organisations
- Other service providers
- Local Authorities
- Press and the media
- Professional advisers/bodies and consultants
- Data processors
- Regulatory bodies
- Law enforcement and prosecuting authorities
- Legal representatives and insurers
- The Disclosure and Barring Service
- Other Government Departments
- Potential Employers

Transfers may take place when:

- Technical and organisational security measures have been put in place, via a contract; **or**
- With the consent of the data subject; **or**
- Where required or otherwise permitted by Law.

## RETENTION SCHEDULES FOR THE DIFFERENT CATEGORIES OF PERSONAL DATA

Outcomes First Group maintains a *Data Retention & Disposal Schedule* outlining the storage and disposal requirements for records we manage.

## GENERAL DESCRIPTION OF YOUR TECHNICAL AND ORGANISATIONAL SECURITY MEASURES

Outcomes First Group takes organisational security measures such as, but not limited to:

- Encryption
- Anonymisation
- Antivirus software
- User access controls
- Physical security e.g. locked cabinets, premises, 'clear desk' procedures
- Risk assessments, Data Protection Impact Assessments
- Staff training and contractual requirements.

## PROCESSOR RESPONSIBILITIES (AGREEMENTS)

All Outcomes First Groups contracts will require any data processor to also keep a record, in writing and available for inspection, of its processing data activities on behalf of the organisation, unless it is an organisation that employs fewer than 250 people AND:

- the processing it carries out is unlikely to result in a risk to the rights and freedoms of data subjects;
- the processing is occasional; or
- the processing does not include special categories of data or personal data relating to criminal convictions and offences.

## THIRD COUNTRIES

From time to time Outcomes First Group may contract with processors and or joint controllers who may store data outside of the United Kingdom but within the EEA. In such circumstances, OFG will enter into data processing agreements or otherwise enter into arrangements to ensure that such transfers are lawful in accordance with data protection legislation.