



## **Privacy Notice for Applicants and Participants**

Think Ahead is committed to protecting and respecting your privacy. This privacy notice sets out how we collect, store, and use your personal data, and who it is shared with, as an applicant to, and if successful, a participant on the Think Ahead programme. It also applies to former participants.

Our policies are compliant with data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and this notice includes some information about your rights under that legislation.

If you have any questions about our privacy notice, you can get in touch with the data protection lead (Liz Ambekar, Finance and Operations Director):

- By writing to us at: Think Ahead, 344-354 Gray's Inn Road, London, WC1X 8BP.
- Calling us on +44(0)20 3404 4453
- Emailing us on [dataprotection@thinkahead.org](mailto:dataprotection@thinkahead.org)

### **Who we are**

Think Ahead is a “trading name” of The Think Ahead Organisation, which is a registered charity and a company limited by guarantee.

Charity number: 1166577

Company number: 10015893

Registered office: Sayer Vincent LLP, 108-114 Golden Lane, London, EC1Y 0TL

We are a charity funded by the Department of Health and Social Care providing a two year fast track route into mental health services. We offer remarkable graduates and career-changers a training programme in mental health social work with an emphasis on high quality practice. Through the programme and our wider work, we attract talented people into mental health services and spread social approaches to mental health across society.

Think Ahead is a ‘controller’ for the purposes of the UK GDPR and the Data Protection Act 2018 . This means we are responsible for your personal data.

### **How we obtain your personal data**

Most of the information we collect is provided directly from you. We may also collect personal data from the following sources:

- From internal and external referees.
- Publicly available sources such as LinkedIn.
- The university that delivers your programme.
- Your consultant social worker.
- The Local authorities and NHS trusts where you will be on placement and/or employed in year two.
- Disclosure and Barring Service.
- Occupational health assessment provider.



- Evaluation survey provider.
- Social media platforms such as SLACK, Facebook.

## **Personal information we collect and process about you**

The data we may collect about you during your application, assessment and enrolment on the programme includes:

- Biographic details including name, title, date of birth, age and gender.
- Contact details including home address, business, email, telephone, LinkedIn, Twitter etc.
- Education information and your other connections with Think Ahead (including student clubs, societies, affiliations etc.).
- Employment/career details.
- Your interests.
- Family and partner/spouse details.
- Voluntary activity.
- Records of communication with Think Ahead.
- Event attendance.
- Videos and photographs; including those that you have provided as part of your application process.
- Identification numbers and online identifiers, such as your IP address.
- Expressions of opinion about you or indications as to our intentions about you.
- Bank account details (for the payment of bursaries and expenses).
- Performance information including fitness to practice processes, conduct, attendance, safety, and academic progress.
- Any communications from you, including details of queries and complaints.
- Right to work in the UK documents.
- DBS certificates.

Certain categories of personal information are regarded by data protection law as more sensitive than others. Known as 'special category personal data', this relates to information about your health, racial or ethnic origin, details of sexual life, sexual orientation, religious beliefs, political opinions or any genetic or biometric data that is used to identify you. This information, and any information about criminal offences or convictions, warrants a higher level of protection under data protection law.

Think Ahead may process special category data about you, including:

- Diversity monitoring information (such as racial or ethnic origin, sexual orientation).
- Information relating to your health and wellbeing (including details of disabilities and medical conditions, learning needs, health and sickness records, details of accidents in the workplace, and allergy information if attending an event).
- Information related to involvement with mental health and social services.
- Occupational health assessment outcomes and reports.

We will only collect and process information about criminal offences and convictions where it is necessary and lawful for us to do so. All participants must undertake an enhanced DBS check, the information from which will be shared with partner organisations.

Think Ahead will always make it clear when we collect this information from you what special category personal data or criminal offence data we are collecting and why.



## Failure to provide personal data

When we collect personal information on our forms, we will make it clear whether you are required by law, or under a contract, to provide your personal data, and what will happen if you do not provide that data.

Where we need to collect personal data by law or in order to perform the contract we have with you and you fail to provide that data when requested, or do not fully disclose the details required, we may not be able to meet our legal obligations or perform the contract we have or are trying to enter into with you. This may, for example, result in the termination of an offer or place on the Think Ahead programme.

## How we use your information

We use this information during the application process to:

- Asses your suitability for the role.
- Support you with your application.
- Monitor and evaluate the application process.

If you are successful in your application we will then use your information to:

- Support you during your time on the programme.
- Administer and fulfil the contract we have with you.
- Pay you.
- To manage your performance.
- To handle any disciplinary matters.
- To handle any complaints or defend claims made against Think Ahead by you or another individual.
- To manage sickness absence.
- To make decisions about your participation on the programme.
- To comply with our legal obligations, including those relating to health and safety and our legal obligation to report fitness to practice issues to Social Work England.
- To ensure compliance with our policies, including the data protection policy.
- Monitor, evaluate and ultimately improve our programme.
- Ensure we can provide you with the most suitable placement.

## Legal basis for using your information

We will only use your personal information when the law allows us to. UK Data protection law requires us to have a legal reason for processing your personal data. Depending on the purposes for which we use your data, one or more of the legal reasons listed below may be relevant:

- You have provided your **consent or your explicit consent** for us to process your personal data (such consent may be withdrawn at any time by emailing [dataprotection@thinkahead.org](mailto:dataprotection@thinkahead.org)), (for example, we may ask for your consent to use your photograph on Think Ahead's website).
- The processing is **necessary for the performance of Think Ahead's obligations under your contract**.
- The processing is **necessary for the performance of a legal obligation** to which Think



Ahead is subject (for example, our legal duty to safeguard beneficiaries, or to provide information to HM Revenue and Customs).

- The processing is **necessary to protect the vital interests of you or another individual** (for example, providing your details to a medical professional in the case of a medical emergency).
- The processing is **necessary for Think Ahead's legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests. Examples of where we may process your personal data in this way are: in order to handle a complaint submitted by you or another individual, to defend any legal claims made against us, to avoid a conflict of interest. Where this condition is used, Think Ahead may conduct a balancing test and where necessary a data protection impact assessment.
- Data may also be processed if Think Ahead can meet the conditions in accordance with the Data Protection Act 2018 Schedule 1 parts 1, 2 and 3.

We will only process special category data where we have also identified an appropriate condition for doing so in accordance with the UK GDPR.

Think Ahead will only process criminal offence data where it has identified an appropriate lawful basis for processing and appropriate policy and safeguards are implemented in accordance with Article 10 of the UK GDPR.

## Sharing your information

The personal information you provide will only ever be shared on a need to know basis and always in accordance with our data protection obligations. Below are some of the organisations and parties we may share your information with:

- The universities who we partner with to deliver the academic programme, for example, in order to deliver the programme to you and if there are concerns about your progress.
- Local authorities and NHS trusts where you will be on placement or employed at any point during your time on the Think Ahead programme for example, in order to deliver the programme to you, and/or handle any complaint / defend any legal claim made by you.
- Your consultant social worker, for example, in relation to your progress.
- External and internal auditors.
- Third parties who help us deliver the programme.
- Social Work England.

We may also share your personal data with third party service providers such as Microsoft Teams and Zoom, to enable us to store information and communicate with you. Our relationship with service providers is regulated by UK GDPR. This means that the service providers are contractually required by us to keep your personal data secure and only process it on our behalf and only in accordance with our strict instructions.

Whenever we share information we always require strict compliance with data protection legislation and we ensure appropriate controls are in place to protect it.



## **Transfers of your personal data to other countries**

There may be occasions when we transfer your information to countries or territories outside the UK and / or the European Economic Area (EEA). Examples include:

- Third party IT service providers such as Zoom

We ensure that any transfer of your personal data is adequately protected and secure by ensuring that it is subject to appropriate safeguards as prescribed by UK GDPR. For example, we may require that the transfer is subject to standard contractual clauses that are approved as providing adequate protection for personal data. For more information about this please contact us.

## **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for us to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

If you are unsuccessful in the application process or you cease to be a participant or member of our alumni we will not contact you unless you have provided specific opt-in consent for us to do so.

## **Automated decision-making and profiling**

Automated decision-making is when a computer or similar electronic system uses personal information to make decisions about people without any human involvement. Profiling is a type of automated decision-making process that takes place when different aspects about a person (such as their behaviour, interests or personality) are analysed in order to make predictions or decisions about them.

Think Ahead does not carry out any automated decision making, including profiling. If that changes we will update this privacy notice and notify you in writing (where appropriate).

## **Your rights**

Under the UK GDPR you have the following rights:

- The right to be informed – you have the right to be informed about how we collect and use your personal data.
- The right of access – you have the right to request a copy of the information that we hold about you, together with other supplementary information.
- The right to rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- The right to erasure (also known as the right to be forgotten) – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- The right to restriction of processing – where certain conditions apply you have the right to restrict the processing.
- Right of data portability – you have the right to have the data we hold about you transferred to another organisation.



- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. Please note this will not affect the lawfulness of processing based on consent before consent was withdrawn.

Should you wish to exercise any of these rights please contact us using any of the methods above. We may need to verify your personal identity before we respond to your request.

### **Making a complaint**

In the event that you have a complaint about how your information is being collected, held, or processed by Think Ahead, please email us on [hello@thinkahead.org](mailto:hello@thinkahead.org) with details of your complaint and the outcome you seek.

You also have the right to make a complaint to the data protection supervisory authority:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113  
<https://ico.org.uk/global/contact-us/>

### **Changes to this Privacy Notice**

This privacy notice was published on 12/04/2021. We will update and change this privacy notice from time to time to reflect changes to the way we handle your personal data or changing legal requirements. Any substantive changes we may make to our privacy notice in the future will be notified to you by email and will be available via [www.thinkahead.org](http://www.thinkahead.org)