

Reflexion Care Group Limited

Legal Basis for Processing Personal Information

This document sets out the legal basis under which Reflexion Care Group Limited retains and processes both personal information and sensitive personal information in respect of employees, contractors, customers, young people and any other third party who we may deal with in the course of operating our business.

Consent

We would only seek Consent as a basis for holding Personal Information if the information was required and could not be held under any other legal basis or if the information is being held at the request of the person to which the Personal Information relates to.

Examples: Photographs which may be used by the company which contain images of the person, or consent from a third party to allow their details to be used for “next of kin” information.

Contractual Obligation

If we hold information to enable us to perform our duties under a contract between us and the person, or a third party who is responsible for the person, for whom we hold personal information about, then this will be our legal basis for processing such personal information.

Examples: Terms and conditions of Employment, Individual Placement Agreement, a contract for the supply of goods and services both to and from our company.

Legal Obligation

As an organisation we are subject to many acts, regulations and legislation which will require us to retain and process both personal information and sensitive personal information. These include (this is not an exhaustive list):

- Employment legislation
- Childrens Acts and Regulations
- Education Acts and Regulations
- Taxation legislation
- Companies legislation
- Health and Safety legislation
- Vulnerable person’s legislation

In most cases we will be processing personal information, and in particular sensitive personal information, due to a legal obligation. This will probably be our primary legal basis for most of the personal information that we retain and process as an organisation.

Vital Interests

There may be certain information that we would hold from time to time under the legal basis of Vital interest – i.e. the information is being held in order to protect someone's life.

In particular, this may be the case with Young People within our care who have life threatening illness or details about themselves that is strictly confidential in order to protect their identity.

We will rarely hold information under the Legal Basis of Vital Interests.

Public Task

Although we are a contractor to Local Authorities we will not retain or process any personal information under the legal basis of Public Task.

Legitimate Interests

We do not retain or process personal information under the legal basis of Legitimate Interest.

Last Reviewed: July 2021