

	Pathways Community Interest Company	Version 1.6
	Pathways CIC Privacy Policy	
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Pathways CIC Privacy Policy

Approval Date: May 2026

Review Date: May 2028

Whilst Pathways CIC board will endeavour to ensure that policies are reviewed within the identified period, there may be times when a policy update and release are delayed. Where this occurs, there will be an automatic extension applied to the current policy until such time that the policy can be updated and put into circulation.

PRIVACY POLICY

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1. PURPOSE

Pathways Community Interest Company (Pathways CIC) respects your privacy and this policy demonstrates our commitment to service users and visitors to our website. This privacy policy describes how we collect personal information about you as a service user or visitor to our websites www.pathwayscic.co.uk, and how this data is collected, stored and processed. This policy, along with Pathways CIC's Information Management Systems governs privacy practices across the organisation.

This privacy policy and any privacy policy or statement of suppliers that support the development or that operate functions of the website on behalf of Pathways CIC is to be read in conjunction.

2. INTRODUCTION

Pathways CIC, is a not-for-profit company limited by guarantee, incorporated and registered in England and Wales, company registration 05774171. Pathways CIC is the data controller under data protection legislation.

Pathways CIC is the owner of www.pathwayscic.co.uk and the website which it maintains. For the purposes of data protection legislation, Pathways CIC is the data controller.

Pathways CIC is committed to protecting your privacy and processing your data in accordance with the Data Protection Act 2018 (DPA) and the UK GDPR (General Data Protection Regulation).

3. INFORMATION WE COLLECT ABOUT YOU

3.1 Personal information we collect when you use Pathways CIC's services or visiting our websites will include:

- Your name, DOB, address, email address, age, health conditions, GP details, employer details and any other information you voluntarily provide to us.
- Your IP address (which is a unique identifier that computers and devices used to identify and communicate with each other) which is automatically recognised by the web server.

3.2 Receiving support from Pathways CIC

When accessing support from one of Pathways CIC services, we may be in receipt of personal information that has been shared by a third party (GP or other Health Care Professionals, Job Centre Plus) before we contact you. You should have consented to this information being shared prior. This information will be shared between organisations through protected channels (encrypted systems) that are tested regularly.

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This document is issued by Pathways CIC and can be located on Pathways CIC's website		

When in receipt of support from one of Pathways CIC's services, we will collect further personal information, termed special category information, from you in order for us to complete our records and provide the necessary support for your needs. This information will include:

- Name, date of birth, gender, address, email address, up to 2 telephone numbers
- You will be asked to provide details of any existing or former health conditions and medication
- You will be asked to provide details of your employment status and given an option to provide details of your current or former employers
- You will be asked to provide details of any caring responsibilities, dependants
- You will have an option to provide information on your ethnicity and religion for equality reporting

Please see "PROTECTING YOUR INFORMATION" for further details of how we handle personal and confidential information. Third party providers have their own Privacy Policy available to view by accessing directly from the providers website.

3.3 Employment Applications

For those with an interest in applying for employment opportunities with Pathways CIC, personal information will be gathered and handled by authorised Pathways CIC personnel and /or suppliers, external representatives and third parties engaged specifically to support Pathways CIC in conducting recruitment and selection or onboarding activities and for employment purposes in respect of successful candidates.

You may be asked to provide additional information not contained within your application or CV to assist the recruitment and selection process for example references or for security/right to work vetting checks. If you choose not to provide this information, it may limit our ability to assess your suitability for employment and may result in us being unable to process your application.

Pathways CIC will keep records of all unsuccessful applicants for a period of 12 months in the event that an opportunity may open during this period. All applicants have a right to opt out. If and when opting out, Pathways CIC will destroy all application records in accordance with its Information Management Systems protocols.

4. HOW WE USE YOUR INFORMATION

Pathways CIC will only collect, use and process personal information where there is a lawful basis to do so under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Depending on the nature of the service being delivered, the lawful basis for processing personal information under Article 6 UK GDPR may include:

- Consent
- Performance of a contract
- Compliance with a legal obligation
- Legitimate interests pursued by Pathways CIC or our commissioners
- Public task, including the delivery of health, wellbeing, employment or community services commissioned by NHS organisations, local authorities, or other public bodies

Where we process special category information, including health-related information, we will do so in accordance with Article 9 UK GDPR. This may include processing necessary for:

- The provision of health or social care services
- Public health purposes

- Employment, social security or social protection purposes
- Explicit consent, where required

Any personal information we collect and process will only be used for legitimate and lawful purposes connected with the delivery, management and improvement of our services, including fulfilling local commissioning and contractual requirements.

We may use your information to:

- Respond to your enquiries, requests or referrals
- Contact you regarding the support or services you are receiving
- Deliver health, wellbeing, employment or community support services
- Facilitate referrals or coordinated support with other appropriate organisations or professionals, where consent or another lawful basis applies
- Meet safeguarding, legal, regulatory or contractual obligations
- Monitor, review and improve the quality, safety and effectiveness of our services
- Develop future services and support local population health planning using anonymised or aggregated information

Pathways CIC may also use anonymised data and service insights to support service evaluation, social innovation, community needs analysis, and future service design. This information will not identify individuals.

Approved and appropriately trained personnel may access information through secure administration systems in order to manage referrals, update records, respond to enquiries, and undertake necessary operational and administrative activities. Access to personal information is restricted to authorised personnel only and is managed in accordance with Pathways CIC's Information Governance and Information Security policies.

Authorised personnel may also use anonymised data to monitor trends, outcomes and service performance as part of our commitment to continual improvement, quality assurance, and business development.

5. SHARING YOUR INFORMATION

When in receipt of support from Pathways CIC's services, we will only share personal information where we have a lawful basis to do so, including with your consent where required. Organisations we are likely to share information with include:

- GP's and other Health and Social Care Professionals
- Other Health Services and Community Services
- Employers or Employment agencies such as Jobcentre Plus
- Local Authorities

Pathways CIC may also share your personal information with the Police and other law enforcement and statutory agencies for the purposes of crime prevention or investigation and supporting work to safeguard children and vulnerable adults.

If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or investigation of a crime or that Pathways CIC is legally obliged to disclose. This is done only on a strict case by case basis and through controlled processes to ensure we are compliant with Data Protection Legislation.

6. PROTECTING YOUR INFORMATION

The data that we collect from you is held on encrypted systems that are tested regularly in accordance with DPA and UK GDPR guidelines. Pathways CIC diligently procures all IT providers, ensuring that they are able to

demonstrate excellent standards in information security and encryption management. All personnel collecting your personal information will have undertaken specific information security systems training and will be regularly observed in accordance with Pathways CIC's Acceptable Use Policy and other information security policies.

Pathways CIC will be 'sub-contracted' for delivery of some of its services. In such instances, IT software and/or access to cloud-based platforms will be provided by the 'Contractor'. This again will be subject to security testing, regular training for personnel and regular monitoring, governed by both Pathways CIC and the 'Contractor' (as appropriate).

7. RETAINING YOUR INFORMATION

We will only ever actively use your information for as long as you're using Pathways CIC's services. We will archive your information in line with Commissioner/contractor requirements. For example, where we are contracted by the NHS this will be for a period of 7 years following your discharge from our services. Your records will be archived on Pathways CIC's secure systems and then destroyed thereafter in accordance with Pathways CIC's retention policy (available at request). We will only ever archive your personal information for legitimate business reasons.

8. COMMUNICATIONS – SURVEYS

We regularly carry out surveys using a third-party provider such as Microsoft Teams / Google Forms. These surveys will be shared via SMS or email.

We will always ask your consent when completing a survey, whilst we will send you the survey, you have a right to decline completion. We will use the contact number or email address you have provided us with to share the surveys with you. You will be asked, as part of the survey to share your name, you again have a right to opt out and leave the questionnaire anonymised. If you do share your name as part of the survey, a member of the Pathways CIC team may contact you in the future to gather further feedback on our services. Please refer to Survey Monkey's Privacy Notice for further information.

9. THIRD PARTY PROVIDERS – We may use digital technologies providers in limited circumstances. These third parties may process your information and in these cases the Pathways CIC privacy policy does not apply. These businesses will have their own privacy policy available. "Where personal data is transferred outside the UK, appropriate safeguards will be implemented in accordance with UK GDPR requirements."

10. YOUR RIGHTS OF ACCESS AND FINDING OUT WHAT INFORMATION PATHWAYS CIC HOLDS ABOUT YOU

As well as the right to access the personal information we hold about you, you have a number of other rights in respect of your personal information under Data Protection Law. These may include (as relevant):

- the right to access or obtain copies of your personal information that we hold
- the right to rectification, including to require us to correct inaccurate personal data;
- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request the erasure of your personal data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain personal data in a commonly used machine-readable format in certain circumstances such as where our processing of it is based on your consent;
- Pathways CIC does not undertake automated decision-making or profiling that produces legal or similarly significant effects.
- where you have an option to provide us with your personal data or not in connection with your use of our website or in connection with any of our products or services, you have the right to be informed about the possible consequences of not giving it to us;
- the right to withdraw your consent to any processing for which you have previously given that consent

This right is subject to certain exemptions which are set out within the Act.

If you would like to make a Subject Access Request, please contact Pathways CIC's Compliance Officer **in writing** at:

Darren Appleby
Compliance Officer
Pathways Community Interest Company
86-88 Timbrell Avenue,
Crewe, Cheshire
CW1 3LY

It is encouraged that all Access Requests are made in writing to the address given above. Prior to releasing information about you, we will need to be able to verify your identity and may therefore ask that you provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source, location and timeframe of the information you are requesting.

10.1 Fees

We will not charge for this. However, we will charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive. We will also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.

10.2 Timescales

We aim to comply with the request for access to personal information as quickly as possible. In most cases, we will be able to provide a copy of the information within one month of receipt of your written request. In order to do this, we may ask you to provide additional details about the source, location and timeframe of the information you are requesting.

We may, on occasion, extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

10.3 Manifestly unfounded or excessive requests

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- Charge the reasonable fee taking into consideration the administrative costs of providing the information; or
- Refuse to respond - if we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to the judicial remedy without undue delay and at the latest within one month.

10.4 Requests for large amounts of data

If your request requires us to process a large quantity of information, we will ask you to specify the information the request relates to.

10.5 Rights and freedom of others

The right to obtain a copy of information or to access personal information should not adversely affect the rights and freedoms of others. If by providing the information requested, we would have to disclose information relating to or identifying a third party we will only do so provided the third party gives consent, otherwise we may edit the data to remove the identity of the third party.

Unless we are under a legal obligation to release data, or the individual has given us permission, personal information will only be released to the individual whom it relates to. The disclosure of such information to anyone else without their consent may be a criminal offence.

For more information relating to Subject Access Requests, please visit:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/subject-access-requests/a-guide-to-subject-access/>

Right to complain

If you are unhappy with how Pathways CIC has handled your personal information, please contact us in the first instance. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF www.ico.org.uk

APPENDIX 1 – COOKIES, THE TYPES WE USE AND HOW YOU CAN DISABLE THEM

In this section you will find information on what cookies may be used when you visit www.pathwayscic.co.uk and how to manage them.

What Are Cookies?

When you browse a website, small text files known as cookies are stored on your computer, smartphone, or other internet-connected hardware. These tools are designed to support efficient site operations, enhance the quality of your browsing experience, and offer website administrators insights into site usage patterns.

Cookies may collect information such as:

- device type,
- browser type,
- pages visited,
- length of visit,
- website performance data,
- and user preferences.

Some cookies are essential for the operation of the website, while others are used for analytics, functionality, or performance monitoring purposes.

How Pathways CIC Uses Cookies

Pathways CIC uses cookies and similar technologies to:

- ensure the website functions correctly,
- improve website performance and accessibility,
- understand how visitors use our website,
- maintain website security,
- and enhance user experience.

We do not use cookies to intentionally collect sensitive personal information.

Where cookies collect information that may identify an individual, this information will be processed in accordance with UK GDPR and the Data Protection Act 2018.

Types of Cookies We Use

1. Strictly Necessary Cookies

These cookies are essential for the operation, security, and functionality of the website and cannot be switched off through our cookie preference tools.

These may include cookies used for:

- security,
- session management,

- accessibility preferences,
- load balancing,
- and consent management.

Without these cookies, parts of the website may not function correctly.

2. Performance and Analytics Cookies

These cookies help us understand how visitors use our website so that we can improve performance, usability, accessibility, and content.

These cookies may collect information such as:

- pages visited,
- time spent on the website,
- referral sources,
- browser type,
- and anonymised usage statistics.

Pathways CIC may use trusted third-party analytics providers, such as Google Analytics or equivalent services, to help analyse website traffic and usage patterns.

Analytics cookies will only be placed on your device where you have provided consent through our cookie banner or cookie preference settings.

Where possible, IP anonymisation and privacy-enhancing settings will be enabled.

3. Functional Cookies

Functional cookies allow the website to remember choices you make, such as language preferences or accessibility settings, to provide a more personalised experience.

These cookies may be disabled; however, some website functionality may be affected.

4. Third-Party Cookies

This includes services such as Google Analytics for website statistics, and social media integrations like Twitter/X or Facebook for our news feeds.

Some areas of our website may contain content or services provided by third parties, such as:

- embedded videos,
- online forms,
- social media integrations,
- mapping services,
- or external booking and survey systems.

These third parties may place cookies on your device in accordance with their own privacy and cookie policies. Pathways CIC does not control third-party cookies and recommends that users review the privacy notices of those providers.

Managing Your Cookie Preferences

When you first visit our website, you will be presented with a cookie banner allowing you to:

- accept all cookies,
- reject non-essential cookies,
- or manage your cookie preferences.

You can change or withdraw your cookie consent at any time through your browser settings or through the cookie preference tools available on our website.

Most internet browsers also allow you to:

- block cookies,
- delete existing cookies,
- or receive alerts before cookies are stored.

Please note that restricting or disabling certain cookies may affect the functionality and performance of the website.

For further information about managing cookies, please visit:

[Information Commissioner's Office \(ICO\) – Cookies Guidance](#)

and

[All About Cookies](#)

Monitoring and reviewing

This policy is monitored regularly by Pathways CIC's Board and Leadership team and is subject to formal review every 2 years, or where there are changes to legislation or internal governance.

ICO registration number: Z2670158

Revision History

Version	Date	Changes	Approved by
1	May 2018	Closed	Y Clarke
1.1	June 2020	Updates to third parties and use of video technology	Y Clarke
1.2	January 2020	Amendment to include DAP 2018 and UK GDPR	V Waghorn
1.3	September 2021	Amendments to contents. Third Party (point 9) missing from previous update.	V Waghorn
1.4	June 2022	Changes to include emails for surveys	M Franklin
1.5	May 2024	Changes to personnel / communication (surveys) and use of third-party providers	Yvonne Clarke
1.6	May 2026	General updates following changes to legislation surrounding data management and processing and Subject Access requests. Inclusion of ICO complaints process	Y Clarke
	CLOSED		

