



Coram Adoption Enquiry Privacy Policy – September 2021

Privacy Overview

Your personal data is protected by UK and EU legislation, specifically the EU General Data Protection Regulation 2016/679 (the 'GDPR'), the Privacy and Electronic Communications (EC Directive) 2003 and the Adoption and Children Act 2002 (ACA). We aim to exceed our legal obligations by following best practice and reviewing our procedures regularly.

Coram is registered as a data controller with the Information Commissioner for the United Kingdom for those purposes for which personal information is collected when you make an adoption enquiry.

Your use of our website is also governed by our website Terms & Conditions and use of other Coram services is governed by any applicable terms as well as the overall Coram Group Privacy Policy.

What information does Coram collect about me when I make an adoption enquiry?

You will be asked to supply personal information when you make an adoption enquiry. Personal information is anything that enables us to identify you in some way, such as your name or address. For instance, we may collect personal information from you as part of making an adoption enquiry over the telephone, when you complete online forms, when you subscribe to our email updates, or when you otherwise provide us with personal information. Coram will only collect personal information when you specifically and knowingly provide it.

If you supply such information, we are legally bound by the Data Protection Act 1998 to ensure that such information is only used for the purpose for which it was requested and also to ensure that the data is held securely.

How do we process your personal data?

Coram complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Coram complies with the Adoption Agencies Regulations 2005 part 7, regulation 40. 'An adoption agency must keep the child's case record and the prospective adopter's case record for such period as it considers appropriate.'

What data do we process and how is it obtained?

We collect and process personal data from:

- Prospective adopters directly
- General Practitioners
- The Disclosure & Barring Service (DBS)
- Local Authorities
- International police forces (if required)
- Family references (nominated by the prospective adopters)
- Personal references (nominated by the prospective adopters)

We use your personal data for the following purposes:

- To facilitate your adoption enquiry
- In the assessment process
- Subject to approval; in the family finding process in partnership with Local Authorities
- To keep you updated with relevant workshops, conferences and/or training sessions and the annual newsletter
- Or, to locate and share information related to birth records

If you are unable to provide us with personal data, we will not be able to continue your adoption application.

What is the legal basis for processing your data?

Article 6 of the GDPR

- Consent of the data subject;
- Processing if necessary for the performance of a contract with the data subject or to take steps to enter into a contract;
- Processing is necessary for compliance with a legal obligation under the Adoption Agencies Regulations 2005;
- Processing is necessary to protect the vital interests of a data subject or another person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by interests, rights or freedoms of the data subject. Any information that Coram obtains will be used in the assessment of a prospective adopter. Any information we obtain will contribute to whether the applicant is suitable to be approved as an adopter and to have a child placed with them.
- Processing is necessary for the reasons of public interest in the area of the looked after children population. This will include social media and internet searches in the public domain.

Sharing your personal data

Your personal data will be treated as strictly confidential, and will only be shared with staff members of Coram Adoption department or regulatory bodies such as Ofsted as required. We will only share your data with third parties outside of this with your consent.

How long we keep your data

For Adoption enquiries:

Coram will retain your data for a minimum of six years.

In cases which proceed beyond enquiry, but not to the point of placement with a child or children, Coram will retain your data for a minimum of 15 years.

Following approval as prospective adopters and a child or children being placed, Coram will retain the data for 100 years in accordance with the Adoption Agencies Regulations 2005.

For access to birth records:

Coram will retain your data for a minimum of six years. For the data subject (i.e. the child who was in care or adopted), Coram will retain your data for a minimum of 75 years for a child in care record, or 100 years for an adopted child record, in accordance with the Adoption Agencies Regulations 2005.

Your rights and your personal data

Unless subject to an exemption (under the GDPR), you will have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Coram holds about you;
- The right to request that Coram corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is **no longer necessary** for Coram to retain such data;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller (the right to data portability), where applicable.
- The right to lodge a complaint with the Information Commissioners Office.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

How can I access the information that Coram Adoption holds about me?

You have the right to ask for a copy of the information we hold about you (for which we may charge a small fee) and to have any inaccuracies in your information corrected. If you wish to exercise these rights, please write to:

Post: Coram Privacy Officer, 41 Brunswick Square, London, WC1N 1AZ.

Email: dataprotection@coram.org.uk

We aim to issue an initial response to all enquiries within five working days, and will offer a full response to all information access requests within forty working days of receipt. It will help us locate your records more easily if you can tell us something about the nature of your contact with Coram Adoption.

How can I make changes to the information that Coram Adoption holds about me?

If your personal details change, please help us to keep your information up to date by notifying us at the above address. It will help us to update your information quickly if you include your full name and address and email address, together with details of the correction to be made.

Your consent

By providing us with your personal information you consent to the collection and use of that information for the purposes and in the manner described in this Privacy Policy. Coram reserves the right to modify or amend this privacy statement. Any alterations to our policy on the collection or use of data will be posted on this website. The latest version will be available on this website so please check periodically. By continuing to use this website you will be deemed to have accepted any changes.

Contact details

If you have a question regarding a data protection issue, please first speak to your social worker. Following that, if you are not satisfied, please contact the Data Protection Coordinator Christine Kelly at 020 7520 0300.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email> or at the Information Commissioner's Office: **Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**

Last updated: September 2021