

Triangle Consulting Social Enterprise Ltd

Privacy Notice for Customers

Updated 23rd May 2018

Contents

| | | |
|-----|---|----|
| 1 | Introduction | 2 |
| 2 | All Triangle customers | 2 |
| 2.1 | The information we hold..... | 2 |
| 2.2 | Who we share this information with | 2 |
| 2.3 | Your responsibilities..... | 3 |
| 2.4 | Your consent for general communications and marketing | 3 |
| 2.5 | Star Online notifications and emails to Star Leads | 3 |
| 2.6 | How long we will keep your data | 4 |
| 2.7 | Where we store your data | 4 |
| 2.8 | General Data Protection Regulation (GDPR) | 4 |
| 3 | Star Online system licence holders | 5 |
| 3.1 | About the Star Online system | 5 |
| 3.2 | The information held on the Star Online system | 5 |
| 3.3 | Communication..... | 6 |
| 3.4 | “Star Lead” role for Star Online system | 6 |
| 3.5 | “Worker” and “manager” roles on the Star Online system..... | 6 |
| 3.6 | Service user data on the Star Online system..... | 8 |
| 3.7 | Star Online system data security..... | 11 |
| 4 | Complaints or questions | 13 |
| 5 | Contact us | 13 |

1 Introduction

In operating our business Triangle Consulting Social Enterprise Ltd (“Triangle”) holds certain types of information about you and your organisation. This notice describes which information we collect and how we use it and applies to organisations before, during and after they have an agreement to use our products and/or services. Sections 1, 2, 4 and 5 of this notice apply to all Triangle customers and Star licence holders, who only use the limited portal of the Star Online web application. Section 3 provides additional information that applies only to Star Online system customers / Licence type 1 licence holders who use the full Star Online system. (See 3.1 for more information.)

Triangle will use all personal information correctly and lawfully. This is a fundamental principle of our work with our clients. It is central to our successful operation and to maintaining the confidence of those with whom we work. Triangle and its staff, associates and contractors respect the privacy of all personal information, and ensure it is treated fairly, lawfully, correctly and confidentially.

2 All Triangle customers

2.1 The information we hold

The information about you and your organisation includes details of the organisation and its services (name, address, type of organisation and registration details if required, contact details) plus the names, job titles, email addresses, telephone numbers of contact people, passwords for staff set up as administrators on the Star Online’s portal (stored encrypted), usage information about the Star Online’s portal (eg the date and time of last log in), bank and relevant tax details as well as information about the services discussed and purchased. The data will always be proportionate to the purpose it is collected for and we hold and process it in line with the General Data Protection Regulation (GDPR). Where Triangle wishes to hold and use data for marketing, Triangle will seek their active consent and the clearly worded option to unsubscribe from future communications will be included on all email communication.

2.2 Who we share this information with

We share this information internally with our staff via our internal IT systems which comply with security requirements. We also share it with our network of associates and, if you are outside the United Kingdom, with our international service providers, who deliver training and support on our behalf. Our external finance and accounting contractors have access to the information to the extent required.

Where external organisations or contractors are involved we ensure that these meet the same standards to protect your information as we do.

If we want to share your information with any third parties, we will always ask you to obtain your express consent. This could be the case if we feel it could be helpful to put you in touch with someone else who is or might be using the Outcomes Star. We will never pass on your personal information to third parties for marketing purposes.

You have a right to access the personal information we hold about you and to request that we send it to you in a common format. You also have the right to request that incorrect information be corrected, or that inaccurate or irrelevant information be removed. The GDPR embeds these rights on the basis that we have a contract with you. If you would like to make use of these rights, please make a written request to our Data Protection Officer (see end of document).

2.3 Your responsibilities

You too have responsibilities under the GDPR for the data collected in connection with the Star. As we do not have a direct relationship with your service users, it is your responsibility to make sure the Star fits with your own data protection policy. This includes ensuring that the data collected by the Star is appropriate for the remit of your service and that the holistic nature of the Star is understood and appropriate for the services using it. You may also need to collect consent from your service users for their data in connection with the Star. If your organisation does not have its own consent forms, we provide consent forms on the Star Online system to support you in meeting your obligations.

2.4 Your consent for general communications and marketing

We will only send you information about our products and services or simply keep you informed about what's happening, after we have obtained your consent. If you have opted in to receive these communications, it is very easy to unsubscribe from our mailing list by following the links provided, or simply emailing us. We will never pass on your personal information to third parties for marketing or any other purposes.

2.5 Star Online notifications and emails to Star Leads

Star Leads are the nominated administrators for the limited 'portal' aspect of the Star Online web application. In-app notifications and alerts are used on the Star Online to notify these users of planned downtime and to communicate important messages, for instance, about upcoming changes to the system. Users can dismiss these once read. Triangle may also email Star Leads. Automated Star Online system email notifications are sent to support the Star lead to manage the account. The frequency can be managed via the account page and they can be switched off altogether. Emails are occasionally sent to Star leads to notify them of new features and modifications.

The Star lead is also the liaison between the Star Online helpdesk and their organisation's users. Emails sent to the helpdesk via lead.support@staronline.org.uk are stored in our online ticket system, Deskpro. Deskpro data is routinely erased after five years.

2.6 How long we will keep your data

We will hold different types of data for varying lengths of time in accordance with the Code of Practice published by the Office of the Information Commissioner:

| Type of Record | Maximum Duration |
|--|---|
| Details of customers or potential customers | 5 years after last contact |
| Customer's Star lead information on Star Online system | Anonymised 3 months after account closure if the organisation does not request that the data be deleted (see Section 3) |
| Contracts and agreements | 12 years after termination of the contract |
| Accounting & tax-relevant information, such as payments, bank statements, ledgers, receipts and invoices | 7 years |

2.7 Where we store your data

We scrutinise any transfer of data outside the European Union (EU) to ensure that this happens in accordance with the requirements of the GDPR. We have satisfied ourselves that the following systems, which we use to store customer data, are compliant with the GDPR:

- Client relationship system: Salesforce
- File-sharing system: Dropbox
- Email provider: Microsoft Office 365
- Finance/Accounting software: Xero
- Ticket system for our Star Online helpdesk: Deskpro
- For marketing emails, provided we have your consent: Mailchimp
- Triangle's system for materials and completion of the Outcomes Star: Triangle's Star Online system, hosted on secure servers in the UK.

2.8 General Data Protection Regulation (GDPR)

Triangle complies with the GDPR. The GDPR applies to all personal information held about living people including named contacts within an organisation. It applies to both electronic and hard copy information. All personal information held by Triangle is collected, held and used in accordance with the principles in the Regulation. It is:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- d) accurate and, where necessary, kept up to date; we take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

In addition, we ensure that our employees, associates and contractors who manage and use personal information understand that they are responsible for complying with the law and applying good data protection practice.

3 Star Online system licence holders

3.1 About the Star Online system

The Star Online system is an online web application supporting organisations to use the Outcomes Star by accessing Star resources, entering Star data and service user information, and reporting on this data and information. It is owned and operated by Triangle Consulting Social Enterprise Ltd and has been designed with data minimisation, pseudonymisation and transparency measures as fundamental features of the system and we apply Privacy by Design principles when considering all Star Online upgrades.

The Star Online system fulfils two roles for Triangle – a portal for licence 2 and 3 for downloads of Star materials (covered by Section 2 of this document), and a full system for licence 1 for completing the Outcomes Star online as well as entering and processing Star data. Section 3 covers any additional information that specifically relates to licence 1 and full system.

3.2 The information held on the Star Online system

All users of the Star Online, which we call “Star leads”, “managers” and “workers”, must provide a valid email address, password, first name and last name in order to log in and gain access to the application and resources it contains. Passwords must be strong and are stored encrypted.

Organisation name, type and location (country) is also recorded and we collect some activity in order to support use of the system, e.g. the date and time of the last login.

We process this information in order to deliver the services agreed with your organisation by the [Triangle Licences, Training and Services Agreement](#).

3.3 Communication

In-app notifications and alerts are used to notify users of planned downtime and to communicate important messages, for instance, about upcoming changes to the system. Users can dismiss these once read.

Email communication varies according to whether you have a “Star lead”, “manager” or a “worker” user account on the Star Online. You can change your email notification settings online.

3.4 “Star Lead” role for Star Online system

3.4.1. Introduction to the Star lead role for the Star Online system

The Star lead is the Star Online account administrator and the primary contact for Triangle in delivering the software service the organisation has contracted us to provide. The information held, how Triangle share Star lead information and the rights of Star leads is covered by section 2. Privacy information specifically relevant to Star Leads is detailed below.

3.4.2. How this information is collected

The organisation provides the information to us directly when setting up the contract (via forms on our website or over the telephone) or when using the Star Online system to update the Star lead details.

3.4.3. Responsibilities of Star leads for the Star Online system

As the account administrator, the Star lead user has access to all data contained within the organisation’s account. In the case of organisations with a Star Online system licence, this includes all service user data entered by your organisation’s users (“workers” and “managers”). They are responsible for removing access from their account’s users and giving new users access.

It’s important the organisation selects a suitable person for this role and that they understand their responsibilities in relation to privacy legislation and the way user permissions work on the Star Online. As a Star lead, it’s your responsibility to read the full privacy policy, and the section on service users’ data (see 3.6.)

3.5 “Worker” and “manager” roles on the Star Online system

3.5.1. Introduction to the “worker” and “manager” roles

This applies to Star Online system licence-holders only (other licence holders can’t add “worker” or “manager” users to their accounts). The rights of these roles are covered by Section 2. Privacy information specifically relevant to Star leads is detailed below.

3.5.2. The information held on the system

In addition to the information we hold on all active Star Online users, we hold the service names, service types, locations (country) of “worker” and “manager” users. We also keep a list of the service users in each person’s caseload (i.e. where the person has been selected as the “lead worker” for a client). We also record some of their activity within the system, for instance, the last time they logged in, and if, when and for which client they’ve entered Star readings and action plans or requested Star readings be deleted.

We keep this information to deliver the Star Online software service to your organisation. Activity logging is carried out to enable organisations to effectively manage their staff’s use of the Star and the Star Online.

3.5.3. How this information is collected

Star leads enter “manager” and “worker” information on the Star Online and “managers” also enter “worker” information. All users of Star Online system licence accounts may enter service user records and “managers” and “Star leads” can assign service users to a caseload.

3.5.4. How long this information is stored

For active Star Online accounts, we keep this information until your organisation requests that it is deleted. If there is no request to delete the account, “manager” and “worker” information is anonymised three months after the organisation’s Star Online account is closed.

3.5.5. Who this information is shared with

The information outlined in 3.1 above is shared with other users of the organisation account via the Star Online application as follows:

- Leads can access, change and delete manager and worker information across their whole organisation account
- Managers can access and change manager and worker information within the services they have permission to access
- Workers can access workers information within the services they have permission to access
- Leads can give managers and workers access to any service in the organisation account
- Managers can give workers access to services they have permission to access only

Your information is sometimes shared with Triangle staff strictly to the extent necessary to solve technical problems or, at your request, to help you with a specific issue.

3.5.6. Responsibilities of these roles

It’s the responsibility of organisations to provide privacy training to all their staff who are using the Star Online and to ensure that staff are familiar with relevant aspects of this Privacy Notice and the data privacy and protection policies and procedures specific to their organisations.

3.5.7. Communications

In-app notifications and alerts are used to notify users of planned downtime and to communicate important messages, for instance, about upcoming changes to the system. Users can dismiss these once read. Automated Star Online system email notifications are sent to support you to process data deletions. The frequency of these notifications can be managed via the profile page and they can be switched off altogether.

3.6 Service user data on the Star Online system

3.6.1. Introduction to service user data on the Star Online system

Star Online system licence-holders only have access to enter service user information onto the Star Online, so this section refers to those organisations with a licence 1 only.

3.6.2. The information held on the system

We process information about service users on your behalf to deliver our contractual responsibilities to you and to enable you to use the Outcomes Star to support and measure change in the people you assist. We have a legitimate interest to do this to deliver the contract we have with you.

Information the Star Online system will process on service users follows.

Service user profile information

Service user records are created and managed by organisations using the Star Online, there is no 'service user' user account type and so we don't require an email address or password for service users. In active Star Online accounts, service user records are pseudonymised – represented by an identifier rather than real name. Star Online users are advised that no personally identifying information should be added to the system in alerts within the system and in our terms and conditions. A service user record is needed to enter a Star reading for the person. And to create a service user record, some information is required.

Service user ID

A unique service user identifier is required to create a service user record on the Star Online. It is used to pseudonymise the service user's information, in line with common practice within services that keep sensitive, personal case files. A pseudonymised record gives the service user greater privacy by making it extremely difficult for someone to identify the person from the information stored on them unless the identifier is known to them. To keep the record pseudonymised, the identifier shouldn't include details which could be used to identify the person, such as their first or last name, their nickname, their initials, their address or room number, their National Insurance, passport number. It is your organisation's responsibility to ensure unique IDs don't identify the person. To support this, we provide an alert and explanatory information for users whenever they update a service user's profile or enter a new Star reading or action plan.

Other required information

The following minimal profile information must be provided when creating a service user record (required fields):

- Lead worker name
- Service name and type
- Organisation name and location
- Date the record was created and who by

Optional additional service user information

The following information can be added to the service user record:

- Date of birth (or age range, if unavailable)
- Gender
- Ethnicity
- Support needs (checkboxes are provided relating to the likely support needs depending on the Star used with a service user)
- Dates for joining and leaving a service

All of these fields are optional, so they can be left blank. If the same information is stored in another system or the Star Online isn't used for reporting it may not be necessary to also capture the information on the Star Online service user record.

Star readings

Organisations can enter multiple Star readings for service users, and though it's possible to use the system without doing so, this is the main reason why organisations buy a Star Online system licence.

For each Star reading, there are a number of areas covering the different aspects of a person's life. For each area there are a series of numbered statements describing where the service user might be – text descriptions of the person's current situation, behaviour and attitudes – from which the worker and service user collaborate to make a choice.

Notes can be entered in free text fields for each area to enable workers to expand on the "reading" selected.

Action plans

The Star Online action plan feature is optional and use of the system is unaffected if organisations choose not to use it. This feature enables workers to record notes in a free text field about one or many areas of the Star and automatically includes the 'reading' number selected for each area included in the action plan.

3.6.3. How long service user data is held

While a Star Online organisation account is active, we keep this information until the organisation removes it or makes a change to it on the Star Online. However, we only record current information on the system, there is no version history. Where users can't use the Star Online to delete or change data, there are systems to enable the Star lead to request this (see the knowledge-base for details). Requests to change or delete data are processed within a reasonable time-frame and the Star lead is kept informed of progress. When you close your account, you will be asked whether you would like us to retain your organisation's data to add to a growing body of evidence or whether you would like it to be permanently deleted.

If deleted, all service user data is erased along with the account. If retained, we anonymise all data in the account so that it is no longer possible to identify individuals at all, including service user data, and certain fields are erased three months after the account is closed.

3.6.4. How service user data is shared

Star data is shared with Triangle and with other organisations using the Star Online in anonymised, collated form only and is used to provide average outcomes so that organisations can compare their results with others' aggregated figures or for research purposes.

Anonymised and strictly limited service user information within active organisation accounts is shared with the first level (Triangle staff) and second level (contractors) helpdesk teams, so that they can support users and resolve issues effectively.

The anonymised data from active and inactive organisation accounts is occasionally analysed and the results published, or the learning used for research purposes to help improve practice, Outcomes Star training, guidance materials and the Star Online system itself. No published research will identify the organisation, service, worker or service user without express permission.

Members of our development team (contractors) have direct access to all data held on the Star Online. It is only rarely accessed in a readable form when vital to de-bug, protect or safely change customers' data with their authorisation. Within the development team, access to service user data is strictly limited to those people who require it for their work and who are adequately trained in processing sensitive, personal data professionally and in a lawful way. Systems are in place to ensure service user data that is accessed by the team is protected and, if downloaded from the system, stored safely, anonymised if possible, and deleted when no longer required.

3.6.5. Our responsibilities for service user data

While service user records are intended to be pseudonymised on the Star Online so that it is very difficult to identify individuals we accept that it may be possible to identify someone from their Star Online record. For this reason, the data is sensitive and personal, and we therefore take great care to protect it. Please read the security information in section 3.7 to find out more about our technical measures to protect the data. In addition, all upgrades to the Star Online and our processes for delivering these upgrades are done with service user privacy in mind. For more information about our release process contact the helpdesk.

3.6.6. Your responsibilities around service user data on the Star Online system

It is your organisation's responsibility to ensure information entered into the free text fields outlined above complies with the GDPR and that all individuals (service users and third parties, e.g. their family, friends etc) are consistently identified by a pseudonym on the Star Online. As we don't have a direct relationship with service users, we are reliant on our system licence holders to ensure their clients know their rights in relation to the GDPR and to comply with the legislation.

Our aim is to support you to do this by providing practical help and clarifying your clients' rights and your responsibilities both with this statement and in-app at key points.

Key areas of responsibility are:

Pseudonymised service user records - use an anonymised, unique client identifier on the Star Online and maintain a secure record of these client identifiers to allow you to connect them to the people they refer to. Do not enter real names or nick names; addresses or room numbers; NHS, passport or National Insurance numbers (for the UK); or anything that identifies a person in the service user ID field or within the free text fields in Star notes or action plans.

Managing access to your Star Online account and your data - use a strong password and do not share it; remove access to the Star Online when staff members leave your organisation; only download and/or print service user data from the Star Online when it's essential and keep it securely and delete it when no longer needed; log out when no longer using the system.

Managing service user consent - if consent is the lawful basis for your organisation to process service user information, you are responsible for gaining a service user's consent to enter their data on the Star Online and to store their data digitally and on paper (except in those circumstances where certain lawful bases for collecting personal information is clear, e.g. vital interests prevail). To support organisations with this, we provide consent forms that are suitable for use with service users whether you use the Star Online system or complete the Star on paper, and an "easy-read" version. If your organisation has its own paperwork, these do not need to be completed. The system does not provide an option to record consent on the Star Online and organisations should have their own systems in place for this.

3.6.7. A service user's right to access to the data and to portability

Your organisation is responsible for giving service users easy access to the data held about them. They have a right to request this information in a portable format and are entitled to re-use it in other services. To support you to do this, the system provides quick links to all data held on the Star Online on each service user's profile in CSV format.

Service users have a right to have their data corrected or erased from the Star Online (unless vital interests applies to your work as set out above). If a service user requests erasure, submit a service user deletion form to the helpdesk and their record will be deleted within 28 days.

Your clients have the right to object to Triangle processing their data on the Star Online. If we receive a request, we may require support to identify the person before we can delete their information.

3.6.8. Communications

Triangle does not communicate directly with service users through the Star Online system.

3.7 Star Online system data security

Triangle takes its responsibility to secure both the system and the data very seriously. We continuously invest in security upgrades and extensive technical and organisational security measures to protect the personal data held on the Star Online against unauthorised access, loss, corruption or destruction.

3.7.1. Server information

The Star Online is hosted in Slough, in the United Kingdom by Rackspace. Rackspace's customers include Transport for London and the NHS. Rackspace's Star Online hosting solution is ISO27001 compliant. Further certification can be provided on request. The Star Online is isolated on its own servers with a dedicated firewall. The Star Online does not share a server with other sites.

The server configuration is mirrored between two hypervisors, with automatic failover between the two in event of hardware failure. All data is stored on a fully redundant Storage Area Network. Further details about the Star Online's hosting arrangements are available on request.

3.7.2. Performance

We actively monitor system uptime, server resource use and performance using automated monitoring tools. In addition, the system is in constant use by our trainers, development team and helpdesk who monitor system speed continuously. We use an entirely virtual machine-based hosting environment, which allows us to scale our resources according to demand. Our uptime target is 99%. Our transfer time / speed target is less than four seconds on average.

To record data processing, the Star Online system logs user ID and date for creation and last edit of all primary system data objects. Currently we do not provide routine audit reports, but details of these are available on request via the helpdesk. In addition, records are kept of customers' requests for data changes and deletions. These are documented on authorisation forms, completed and signed off by the customer, and managed via our ticket system. Full details of the audit are available on request.

Changes are made following an established change management process led by the Star Online's product manager and with authorisation for significant changes sitting with Triangle's lead senior manager and monitored by Triangle's project manager. Further details are available on request.

3.7.3. Encryption

All data that flows between the Star Online website and the web servers and the server and the user's computer is encrypted making it far less vulnerable to third party security attacks. Passwords are stored in an encrypted form. Further details available on request.

3.7.4. Backup procedures

A full onsite data backup is performed every seven days, with differential (the difference in data) backup performed hourly. Backups are retained on site for four weeks. A differential offsite data backup is performed hourly and stored at a different location to our 'onsite' backups. These offsite backups are retained for 30 days. In addition, organisations can download all data as a series of CSV files in order to create their own backup routines and as a way to enable them to flexibly analyse their data. This is available via the reports section of the Star Online.

3.7.5. Disaster recovery

The Star Online has a Disaster Recovery Plan (DRP) in place. The process of restoring code from the code repository and data from the backup is regularly used.

3.7.6. Cookies

The Star Online web application uses cookies. When users log in to the Star Online, cookies are used to maintain their login state and allows them to access parts of the site that only licensees are able to use. If you do not wish to allow the Star Online to use cookies, you can disable them however this will restrict access to the full system.

3.7.7. Vulnerability testing

In January 2018, we subjected the Star Online to external, CREST-approved application and environment penetration testing. We will complete all improvements before September 2018. Our policy is to scrutinise the security of the Star Online by carrying out an external penetration test every two years or following major changes to the site code or environment and to undertake any required update or remediation in a timely fashion. The next test will take place in 2020. We also carry out regular vulnerability auditing.

3.7.8. Development team

While our development team has been in place since 2011 and is integrated with our staff team, they are contractors. Nemisys provides technical support, site and server maintenance and manages our relationship with our hosts, Rackspace. Jellymould LLP provides project management, UX design, design, testing, second level support and generally supports Triangle in the management of a complex system. Both parties have provided statements to Triangle on their compliance with the GDPR and shared their systems for processing customer and service user data on our behalf. For more information, contact the Data Protection Officer.

4 Complaints or questions

If you have concerns about the way we treat your personal information, please contact us using the details below. You always have the right to make a complaint to the Information Commissioners Office too. Please visit their [website](#) to contact them.

5 Contact us

If you wish to discuss this privacy notice or have any concerns, please contact the Data Protection Officer at Triangle by emailing info@triangleconsulting.co.uk or calling +44 (0)207 272 8765.

More information about the Outcomes Star and the Star Online can be found on our website, www.outcomesstar.org.uk.

Triangle is the trading name of Triangle Consulting Social Enterprise Limited, company registration number 07039452, registered address Preston Park House, South Road, Brighton, East Sussex, BN1 6SB.