

# PRIVACY POLICY

**Policy No. 27**



## Introduction

Orr Medical is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Due to the nature of our services, we also process personal data in compliance with safeguarding legislation and regulatory requirements enforced by Ofsted and relevant local authorities.

## Data Controller

Orr Medical is the data controller responsible for your personal data.

Contact details:

Email: [admin@orrmedical.co.uk](mailto:admin@orrmedical.co.uk)

## The Data We Collect

We may collect and process the following categories of personal data:

- **Identity Data**  
Name, title, date of birth, gender, identification documents.
- **Contact Data**  
Address, email address, telephone number.
- **Financial Data**  
Bank account and payment card details.
- **Transaction Data**  
Details of services purchased and payment history.
- **Technical Data**  
IP address, browser type, device identifiers, usage data, and cookies.
- **Profile and Usage Data**  
Preferences, feedback, survey responses, and interactions with our services.
- **Special Category Data**  
Health data and safeguarding-related data required for regulatory compliance.
- **Safeguarding and Ofsted Regulatory Data**  
We collect and process personal data required for safeguarding, fostering, and regulatory compliance. This includes:
  - **Health and medical information**
  - **Background and suitability assessments**
  - **Case notes and supervision records**
  - **Family and household information**
  - **Safeguarding reports and incident records**
  - **Communications with Ofsted and local authorities**
- This data is processed strictly in accordance with our legal obligations under safeguarding legislation and Ofsted regulatory requirements.

## How We Collect Your Data

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We collect personal data through:

- Direct interactions (forms, emails, phone calls)
- Website usage and cookies
- Third parties such as regulators (including Ofsted), local authorities, and service providers

### Lawful Bases for Processing

We process your personal data under the following lawful bases:

- **Contract:** To provide services you request
- **Legal Obligation:** To comply with applicable laws and regulatory requirements, including safeguarding and Ofsted obligations
- **Legitimate Interests:** To operate, improve, and secure our services
- **Consent:** For marketing and certain sensitive data processing

### Special Category Data

We process special category data under:

- Legal obligation
- Substantial public interest (safeguarding of children and vulnerable individuals)
- Explicit consent where required

### How We Use Your Data

We use your personal data for the following purposes:

Purpose	Lawful Basis
Service delivery and account management	Contract
Payment processing and debt recovery	Contract / Legitimate Interest
Customer support and communication	Contract / Legal Obligation
Safeguarding, inspections, and regulatory compliance (including Ofsted reporting and audits)	Legal Obligation / Public Interest
Maintaining safeguarding records, case files, and assessment documentation	Legal Obligation / Public Interest
Marketing communications	Consent / Legitimate Interest
Website analytics and improvements	Legitimate Interest
Fraud prevention and security	Legitimate Interest / Legal Obligation



### **Legitimate Interests**

We rely on legitimate interests where necessary to:

- Improve services
- Ensure security
- Prevent fraud
- Manage business operations

We carry out balancing tests to ensure these interests do not override your rights.

### **Marketing**

You will receive marketing communications only if:

- You have given consent, or
- You are an existing customer and have not opted out

You can opt out at any time via email or unsubscribe links.

We do not share your data with third parties for marketing without your explicit consent.

### **Cookies**

We use cookies in accordance with UK Privacy and Electronic Communications Regulations (PECR).

- **Strictly necessary cookies:** Required for website functionality
- **Analytics cookies:** Used only with your prior consent
- **Marketing cookies:** Used only with your prior consent

You can manage your cookie preferences via our cookie consent banner.

### **Data Sharing**

We may share your personal data with:

- Regulatory authorities, including Ofsted and local authority safeguarding teams, where required for inspections, registration, safeguarding duties, audits, or compliance reporting
- Service providers (IT, hosting, payment processing)
- Professional advisers (legal, financial, insurance)
- Law enforcement or government bodies where required by law

Where we share data with Ofsted or safeguarding authorities, this may include sensitive personal data, assessment records, safeguarding information, and regulatory documentation. Such sharing is carried out strictly under legal obligation and in the substantial public interest.



All third parties are required to protect your personal data and process it in accordance with the law.

### **International Transfers**

Where personal data is transferred outside the UK or EEA, we ensure appropriate safeguards are in place, including:

- UK adequacy regulations
- Standard Contractual Clauses (SCCs)

### **Data Retention**

We retain personal data only as long as necessary:

- Customer and financial records: 6 years (legal requirement)
- Safeguarding and Ofsted-related records: retained in accordance with statutory and regulatory requirements
- Health and assessment data: retained as required for safeguarding and compliance purposes
- Marketing data: until consent is withdrawn

After this period, data is securely deleted.

### **Data Security**

We implement appropriate technical and organisational measures including:

- Encryption
- Secure servers
- Access controls
- Restricted access to safeguarding data

### **Your Rights**

You have the right to:

- Access your data
- Correct inaccurate data
- Request erasure
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent

Some rights may be limited where processing is required for safeguarding or legal obligations.

Requests will be responded to within one month.

### **Children's Data**

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We process children's personal data only where necessary for safeguarding, fostering, and regulatory purposes, including compliance with Ofsted requirements and child protection laws.

### **Automated Decision-Making**

We do not carry out automated decision-making or profiling that produces legal or significant effects.

### **Complaints**

The Data Protection Officer (DPO) oversees compliance with this privacy notice. If you have any questions or concerns about this Privacy Notice or how we handle your personal information, please contact the DPO at [admin@orrmedical.co.uk](mailto:admin@orrmedical.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO): <https://ico.org.uk>, the UK supervisory authority for data protection issues.

### **Changes to This Policy**

We may update this policy periodically. Updates will be published on our website.

### **Contact Us**

If you have any questions about this policy:

Email: [admin@orrmedical.co.uk](mailto:admin@orrmedical.co.uk)