



Enabling Assessment Service London
Community Interest Company
07788420

Privacy policy

Version	4
Policy lead /author & position	Elaine Greer
Approved by	Barney Wells
Date approved / agreed	July 2026
Previous reviews	2025, 2022; 2018
Target review date	July 2028
Target audience	All Staff

CONTENTS

CLAUSE

1.	Important information and who we are.	1
2.	The data we collect about you	2
3.	How is your personal data collected?.....	2
4.	How we use your personal data	2
5.	Disclosures of your personal data	4
6.	International transfers	4
7.	Data security	4
8.	Data retention	5
9.	Your legal rights.....	5
10.	Complaints.....	6
11.	Glossary.....	6

Introduction

Welcome to the Enabling Assessment Service London's ("EASL") privacy policy.

EASL respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are.

Purpose of this privacy policy

This privacy policy aims to give you information on how EASL collects and processes your personal data.

It is important that you read this privacy policy together with any other privacy policy or related document so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Enabling Assessment Service London is the controller and responsible for your personal data (collectively referred to as EASL, "we", "us" or "our" in this privacy policy).

We have a Data Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our Data Manager in the following ways:

Full name of legal entity: Enabling Assessment Service London Community Interest Company (EASL)

Email address: barney@easl.org.uk

Postal address: Kemp House, 124 City Road, London EC1V 2NX

Telephone number: 020 3291 4184

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Website and Third-party links

EASL's website functions as a brochure to the EASL service and we do not use it for the collection of any data. Our website may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data.** Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data.** Includes address, email address and telephone numbers.
- **Special Categories of Personal Data.** This may include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health.

3. How is your personal data collected?

We may use different methods to collect data from and about you including through:

Direct interactions. You may give us your identity, contact and special category data, when you meet, in person or over the phone, with a professional from EASL for assessment purposes, or when you give us feedback or contact us directly.

Third parties. We may receive personal data about you from third parties. Generally these would be organisations that you are already in contact with, and this is likely to be relation to your housing or health.

4. How we use your personal data

We will only process personal data on the basis of one or more of the following legal grounds

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation. We will identify the relevant legal obligation when we rely on this legal basis.
- Where processing of "special category data" is necessary in the context of our work or where another legal ground other than explicit consent is available to us under relevant data protection legislation.

- Where the provision of our services require us to process "special category data" and where we have obtained your explicit consent to do so.
- Where you have given your consent to the processing of your data for one or more specific purpose.
- It is necessary to protect the vital interests of the individual or another person.
- It is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Where we need to perform the contract, we are about to enter into or have entered into with you.

See 'LAWFUL BASIS' in the glossary section at the end of this policy to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data. We will endeavour to work with you in a transparent and collaborative way which incorporates an understanding of your views.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Activity Carried out by EASL	Assessment by an EASL Professional
Purpose of data processing in relation to this activity	1) To allow us to form clinically/ professionally justified views and subsequently provide appropriate advice to you and to the organisation that you are being supported by 2) To enable these views to be taken into consideration by agencies and bodies that may offer you support, accommodation or health care 3) Maintaining a record of the information that we can use to justify our past decisions, advice and actions in the future if need arises.
Type of data	Identity Data this may include first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. Contact Data includes address, email address and telephone numbers. Special Categories of Personal Data this may include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health.
Lawful basis for processing including basis of legitimate interest	a) Necessary to comply with legal obligation b) Necessary for legitimate interests – the purposes above require the processing of personal data – we are doing this in the interests of the individual and in some circumstances the public

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table 'Purposes for which we will use your personal data' above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

- The organisation that you are already in contact with who have sought advice from EASL or who have referred you to us. This will usually be a housing or homelessness organisation. They will have taken steps to notify you around how they use your data.
- Other organisations, usually related to housing or health, that may have a role in supporting you. We would usually not do this directly but support the organisation you are already contact with, or you, to do this.
- Other organisations where sharing of specific information is legally justified on the basis of direct risk of harm.

6. International transfers

We do not transfer your personal data outside the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your

personal data to those employees, who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory or other requirements.

Details of retention periods for different aspects of your personal data are available in our Data Retention Policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the sections below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint. You can find our complaints process here easl.org.uk

11. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services. The information they have access too is, in usual circumstances, encrypted.
- EASL employee will have some information shared with payroll and accounting services.

- EASL would not in usual circumstances share information with other external parties (other than in the circumstances listed in section 5 above) unless you explicitly requested this – for example if you had a lawyer representing you.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you

withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Position: Director

A handwritten signature in black ink, appearing to be 'B. L. H.', is written over the text 'Position: Director'.

Date: July 2026 Review Date: July 2028