



PRIVACY NOTICE

Stepping Stones NI would like to advise you of new data protection legislation, which aims to protect the privacy of all EU citizens and prevent data breaches, from 25th May 2018. The previously established key principles of data privacy will remain relevant in the new Data Protection Legislation but there are also a number of changes that may affect existing contracts with you.

This notice will help you understand how and why Stepping Stones NI collects personal information about you and what we do with that information. It also explains decisions that you can make about your own information. We value your trust and have strived to present this policy in clear, plain language instead of legalese.

What is personal information?

Personal information is information that identifies you as an individual and relates to you. This includes contact details, next of kin and financial information. We may also hold information such as your date of birth, attendance, health record, disciplinary record, safeguarding, religion, ethnic group, photos and video recordings which are regarded as personal information.

How your information will be used

- 1.** The organisation needs to keep and process information about you for normal business purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the organisation and manage our relationship with you effectively, lawfully and appropriately.
- 2.** As an organisation pursuing a positive impact on the future of people with learning difficulties and disabilities, and through support and education and training activities assist them into employment, we may sometimes need to process your data to pursue our legitimate business interests, for example for administrative purposes. We will never process your data where these interests are overridden by your own interests.
- 3.** The information we hold will have been provided by you.
- 4.** The sort of information we hold includes your name, postal address, email address, contact telephone number/s. We may also hold financial details depending upon the nature of your business with us.
- 5.** Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to

you or to allow us to pursue our legitimate business interests. In accordance with our legal obligations, we may share information with:

- The Department for Economy in relation to ESF funded projects
- South Eastern Health and Social Care Trust and Social services in relation to safeguarding issues
- PSNI in relation to safeguarding issues
- Legal advisors for the purpose of obtaining legal advice
- Personnel and Training Services HR Company who provides HR subcontracting support in relation to our employees.
- Company insurance company, where there is a serious incident.
- Other providers e.g. if a trainee or client is moving from Stepping Stones. If a person leaves us to attend another provider we may need to provide that provider with information about you, to best support you.
- Employers who we are liaising with to secure work placements and employment opportunities for clients.
- We may need to share information if there is an emergency, for example, if you are hurt or injured whilst on Stepping Stones services.

6. The personal data we hold on our employees falls into a variety of categories. Some of these we need to retain for a statutory period and others we retain for set periods for legitimate reasons.

7. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Financial information

We will process financial information about you in relation to the payment of goods and services relating to social enterprise activity and service delivery.

Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your information.

Legal basis for processing

Under GDPR it is essential that each time we process your information, we have a legal basis for this. We use the following legal basis for processing your information:

Legitimate interests

Stepping Stones NI relies on legitimate interests for most of the ways in which it uses your information. Legitimate interest means that we process information because we believe that it the processing provides clear benefit to our customers or Stepping Stones NI.

Specifically, we have a legitimate interest in:

- Providing training and advancement of skills for people with learning difficulties;
- Promoting the objectives and values of the organisation, including fundraising;
- Facilitating the efficient operation of the organisation; and
- Ensuring that all relevant legal obligations of the organisation are complied with.

In addition, your personal information may be processed for the legitimate interests of others. If you object to us using your information where we are relying on our legitimate interests as outlined above, please speak to the Data Protection Officer.

Necessary for a contract

We will need to use your information in order to perform our obligations. For example, we need your name and contact details so that we can update you on trainee and clients progress if appropriate and so that we can contact you if there is a concern.

Legal obligation

We may need to use your information in order to comply with a legal obligation, for example to report a concern to Social Services. We may also have to disclose your information to third parties such as the courts, the Department for the Economy, insurers or the police when legally obliged to do so. The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Vital interests

We may need to share medical information we have in exceptional circumstances - For example, to prevent someone from being seriously harmed or if they are seriously hurt and are unconscious to assist with the emergency.

Public interest

Stepping Stones NI considers that it is acting in the public interest when providing services. Stepping Stones NI may process special categories of personal information for legal compliance. These special categories are as follows: personal information revealing racial or ethnic origin, religious beliefs, age, trade union membership, and health information.

Consent

Whilst the majority of the personal data provided to Stepping Stones NI is required for us to comply with our legal obligations, some of that information is provided on a voluntary basis through parental consent. Where we need consent Stepping Stones NI will provide a notice explaining why the data is being collected and how it will be used. If we ask your consent you can take your consent back at any time.

Retention

We keep your information for as long as we need to in order to provide services for people with learning difficulties. We will keep some information after people leave our services, for example, so that we can find track the length of time people are in employment. In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. We can keep information about you for a very long time or even indefinitely if we need this for historical purposes, e.g to adhere to retention policy of ESF programmes by retaining information to 2030. To find out for how long we keep your information please refer to Stepping Stones NI - Document Retention and Disposal Policy.

Data Security

Like other organisations we need to keep your information safe, up-to-date, only use it for what we said we would, destroy it when we no longer need it and most importantly, treat the information we get fairly. We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an authorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

Your Rights

From May 2018 data protection legislation extends your rights regarding your information. Some of these are new rights whilst others build on your existing rights.

Your rights are as follows:

- If information is incorrect you can ask us to correct it;
- You can also ask what information we hold about you and be provided with a copy;
- We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- You can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- Our use of information about you may be restricted in some cases.

The Information Commissioner's Office (ICO) can give you more information about your data protection rights. Further information and guidance is available from <https://ico.org.uk>

The Quality and Compliance Officer is the person responsible at Stepping Stones NI for managing how we look after personal information and deciding how it is shared.

Please contact Mrs Marie Robertson Quality Compliance Officer/Data Protection Officer Marie.Robertson@stepping-stones.org.uk if you:

- a. object to us using your information for internal marketing purposes e.g. to send you information about Stepping Stones events; we will stop using your information for marketing purposes if you tell us not to; or
- b. would like us to update the information we hold about you; or
- c. would prefer that certain information is kept confidential.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

If you consider that we have not acted properly when using your personal information or if you require more information about your data protection rights you can contact:

The Information Commissioner's Office – Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast BT7 2JB Tel: 028 9027 8757 Email: ni@ico.org.uk

Identity and contact details of Data controller

Stepping Stones NI is the controller of data for the purposes of the DPA 2018 and GDPR with Head Office based at 39 Seymour St Lisburn BT27 4SY.

If you have any concerns as to how your data is processed you can contact:

Marie Robertson: Quality & Compliance Officer/Data Protection Officer:
Marie.Robertson@stepping-stones.org.uk