



Service User Privacy Notice

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START360TM



**Change
Starts
Here**

1. Introduction

This Service User Privacy Notice tells you what we do with your personal information when you access services from Start360.

Data protection is a fundamental right. The European Union General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA 2018) govern our use of personal data and ensure that your rights are protected.

Start360 understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our service users and will only collect and use personal data in a way that is consistent with our obligations and their rights under the law.

2. What do we collect and what do we use it for?

Personal data is any information from which you can be identified directly or indirectly. Start360 processes the following about you:

Your **contact details** – such as your name, address, phone numbers, next of kin etc so that we can contact you

Your **referrer's contact details** – so that we can inform them of your progress

Your **equality profile** – such as your gender, age, disability to monitor the equity of our delivery client profile on who benefits from our services

Your **relevant medical details** – such as medication that may need to be taken, allergies or other health conditions to ensure we can take the best care of you in the case of an emergency and so that we can tailor our services to meet your needs.

Your **engagement details** – including referral details summarising your need for services, relevant issues you may have faced in your life, ongoing session notes and dates, and attendance record, so that we have an accurate record of your engagement with us.

Your **assessment details** – such as your assessment baseline scores or feedback surveys so that we can monitor your progress and the performance of the service.

Your **bank details** – for services which require us to process statutory payments or expenses such as Educational Maintenance allowance.

Some of your information will be retained for research and development reporting purposes. This will usually be anonymised, but your consent will be obtained if you will be named in any of these reports that may be kept longer term.

We also collect, use and share aggregated data such as statistical or demographic data which we collect from interactions with our service users. This is used for management monitoring reports and general research purposes. Aggregated data may be derived from personal data but since it cannot be used to identify an individual, it is not personal data.

3. Purpose and legal basis for processing

Start360 is a company registered in Northern Ireland, with registered office at 6-10 William Street, Belfast, BT1 1PR. Our company number is NI033207, and charitable number is NIC105848.

In order to provide our services, we need to process personal and sensitive data. Start360 is the **controller** for information about you that is collected and held when you are accessing Start360 services.

Under GDPR, we must always have a lawful basis for using personal and sensitive data. This may be because the data is **necessary for our delivery** of services to you, because you have **consented** to our use of your personal data, or because it is in our **legitimate business interests** to use it.

As part of our services we may be required to transfer some personal data to other people such as advising the person who referred you about your progress and if you have attended your appointments.

For some services, Start360 is a **processor** for certain information which means that we are processing that data on behalf of (and in accordance with the instructions of) another organisation. For example, Start360 is a processor in respect of processing Educational Maintenance Allowance payments for some employability related services.

4. How do we secure your personal data?

It is our policy to ensure that all personal data held by us is handled correctly and appropriately according to the nature of the information, the risk associated with mishandling the data, including the damage that could be caused to you as a result of loss, corruption and/or accidental disclosure of any such data, and in accordance with any applicable legal requirements.

We take appropriate physical, electronic and managerial measures to ensure to keep your information secure, accurate and up to date. Sensitive information is always locked away and only authorised personnel can access it. Our servers, where electronic records of your engagement are kept, are kept on servers located in the UK and is carefully and regularly backed up.

5. How long will we keep your data?

We only keep it as long as reasonable and necessary. Some parts of your information such as your postcode, reported issues, assessment scores and survey scores may be kept longer to inform our longitudinal research into the effectiveness of our interventions. This will be anonymised where possible. We may have to retain some other information for legal reasons.

Some funders stipulate a data retention period in their contract and we have a duty to comply with this. Where a funder does not stipulate any retention period, we will dispose of your data 2 years after your last interaction (with the exception of the information in the above paragraph which is held for longitudinal research purposes). Data on any financial transactions will be kept for seven years in accordance with financial legislation.

When we no longer need information, we will always dispose of it securely, using specialist companies, if necessary, to do this work for us.

We may store aggregate data without limitation on the basis that no individual can be identified from the data.

6. Will we share your information to anyone else?

We may transfer the information to other staff members, if for instance you are referred internally to another service or to another practitioner in the same service.

Your case details may be shared with your practitioner's line manager in performance management reviews to ensure the staff members are offering you the best possible care. Your name will be anonymised in any written staff performance management records held by the organisation.

We may also share your information with your referral agent to keep them informed of your progress and to other third-party organisations involved in your care.

Where information needs to be shared, clear Data Sharing Agreements will be put in place with the third-party to ensure they comply with the data protection regulations.

7. What rights do you have about the personal data we collect and hold?

You have certain rights under data protection law:

Right to be informed. You have the right to know how we use your personal information in clear and transparent language.

Right of access. You have the right to know and have access to the personal data we hold about you (more about this below).

Right to data portability. You have the right to receive your personal data in a common and machine-readable electronic format.

Right to be forgotten. You have the right to have your personal data erased.

Right to rectification. You have the right to have your personal data corrected where it is inaccurate or incomplete.

Right to object. You have the right to object to our processing where it is carried out under our legitimate interests.

Right to purpose limitation. You have the right to limit how we use your personal data in certain circumstances.

Rights related to automated decision-making and profiling. You have the right not to be subject to decisions without human involvement.

Though these rights depend on our reason for processing your information, they must be protected. We are committed to upholding your rights in line with the law. The Information Commissioner's Office provides advice and information on how to exercise these rights.

You can contact the Data Protection Guardian for further clarification or about any concerns you might have. You can contact the Data Protection Guardian in writing to 6-10 William Street, Belfast, BT1 1PR or by email to dpg@start360.org.

You also have the right to lodge a complaint with the Information Commissioner's Office, which upholds data protection rights: <https://ico.org.uk/concerns>

8. What happens if you no longer want us to process personal data about you?

If we are holding personal data about you as a processor, we will need to transfer your request to the controller who has engaged us to provide our services.

If we are holding personal data about you as a controller, we will comply with your request unless we have reasons for lawfully retaining data about you.

If we are holding personal data about you and using that data for marketing purposes or for any other activities based on your consent, you may notify us at any time that you no longer want us to process personal data about you for particular

purposes or for any purposes whatsoever and we will stop processing your personal data for that purpose. This will not affect your ability to receive our services.

9. Accessing your personal data

You have the right to get a copy of information held about you.

If you want a copy your personal data held by us, you should make your request in writing to the Data Protection Guardian who will ensure that your request is carried out in line with your rights. Any request should be made to the Data Protection Guardian in writing at 6-10 William Street, Belfast or by email to dpg@start360.org. You may be required to prove your identity.

You will receive a response promptly and within one month. There is no fee for this service.

10. Changes to this privacy notice

We may change this privacy notice from time to time by updating this page to reflect changes in the law, the type of work we do, and our privacy practices. The most up to date copy of our privacy notice will always be available on our website.

If you have any questions about this notice, feel free to send us an email to dpg@start360.org.