**Early Steps**

**General Data Protection Regulations 2018 – Privacy notice and policy**

**INTRODUCTION**

This notice is to help you understand how and why we collect personal data about the children registered for Early Steps and what we do with that information. It also explains the decisions Early Steps can make about this information.

We are required under data protection legislation to notify you about the information contained in this privacy notice. This notice does not form part of the contract between Early Steps and any services we provide.

We may update this notice at any time but if we do so, we will provide you with an updated copy as soon as possible. It is important that you read and retain this notice, together with any other notice we provide on specific occasions where we are collecting and processing information, so that you are aware how and why we are using such information and what our clients’ rights are under the new data protection legislation.

**DATA PROTECTION PRINCIPLES**

We will comply with data protection law. This says that personal information about our clients must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we will clearly explain to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we will tell you about and limited only to those purposes
4. Accurate and up to date
5. Kept only if necessary for the purposes we will tell you about
6. Kept securely

**The kind of information we hold about the children attending Early Steps**

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

There are special categories of more sensitive personal information which requires a higher level of protection, such as information about a child’s health. We may collect, store and use the following personal information about children:

* Name
* Date of birth
* Home address
* Diagnosis
* Photographs and video clips of the children used as evidence of progress as well as for use in training and conference materials (but only when subject to additional consent through the school)
* Records relating to individual children, e.g. speech and language reports, IEPs, behaviour support plans

**How we collect Personal Information**

We collect personal information about children directly from parents and carers attending Early Steps.

**How we store Personal Information**

We may store some personal information about children we work with for two reasons; Clinical Decision Making and for Research purposes through our association with the University of Warwick. All staff have had training in GDPR. All personal information that is held is only accessed through password protected computers that have anti-virus software installed.

***Clinical Decision Making***

All children’s personal information is stored securely on the Early Steps staff laptops. When possible, children’s data is anonymised, e.g. using initials instead of names and other means so that the data is unidentifiable. Documents containing any personal data is password protected.

All client assessments are kept in a locked cabinet and are only accessed by authorised personnel.

***Research Data***

For research purposes (e.g., social validity assessments), sometimes staff views are collected regarding particular interventions. This data is handled according to University ethical guidelines that stipulate clear rules to ensure anonymity. For example, recorded interviews are destroyed as soon as transcripts are made of the interviews, and there is no identifiable information recorded in the transcription (staff names, etc). Interview transcripts are kept only on the University secure server which can only be accessed with passwords and encryption.

All children’s personal data that is used for research purposes is also handled using university ethical guidelines. For example, data sets have codes in place of student names so that individual students cannot be identified.

**How we use personal information about the children**

We will only use personal information about children when the law allows us to. Most commonly we will use personal information in the following circumstances:

1. When we need to perform the contracted services with the child (i.e. clinical services)
2. For research purposes (anonymised data)
3. When we need to comply with a legal obligation
4. Where it is necessary for our legitimate interests (or those of a third party), and the children’s interests and fundamental rights do not override those interests

We may also need to use children’s personal information in the following situations, which are likely to be rare:

1. Where we need to protect the child’s interests (or someone else’s interests)
2. Where it is needed in the public interest or for official purposes

**DATA SHARING**

We may have to share children’s data with third parties, including third party providers and clinical decision makers. We require third parties to respect security of children’s data and to treat it in accordance with the law.

**Why we might share client data with third parties**

We will share children’s personal data with third parties when required by law, where it is necessary to administer the working relationship with the child or where we have another legitimate interest in doing so.

**Which third party service providers process this personal information?**

The following third-party service providers process personal information about the children we work with for the following purposes:

* Local Authority Health Professionals – for monitoring purposes (e.g. local authority psychiatrist)
* School Team – such as teachers, TAs, Speech and Language Therapists, Occupational Therapists
* Affiliate employees of CBS - particularly to review Behaviour Support Plans and sharing of clinical data with the consultant behaviour analyst (Dr Corinna Grindle) and external consultants (e.g., Dr Sandy Toogood, Professor Richard Hastings)
* Members of Warwick University Research Team– anonymised data only is shared with the research team

**How secure is the children’s information with third party service providers?**

All the third-party service providers who have access to the children’s data are required to take appropriate security measures to protect personal information in line with GDPR. We only provide the necessary personal information required for specific reasons.

Most of our data is anonymised. When this is not possible, all personal information is encrypted, and password protected. Once the data has been processed by the third party (e.g. the Consultant Behaviour Analyst) files are deleted and kept for no longer than is necessary (see below), in line with GDPR.

**DATA RETENTION**

**How long is personal information stored for?**

We will only retain personal information about children if necessary, to fulfil the purposes we collected it for, including satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period, we consider the amount, nature and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process the data and whether we can achieve those purposes through other means. In some circumstances we may anonymise the personal data we hold about children so that it can no longer be associated with an individual, in which case we may use such information without further notice to the school (for example, in a conference presentation, mentioning that “a child we work with was able to……….). If the data is no longer needed, we will securely destroy the personal data we hold on that child in accordance with our data retention policy OR applicable laws and regulations.

**RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

It is important that all personal data we hold is accurate and current. We would be grateful if we can be informed of any changes to children’s personal information during the duration of the working relationship.

Under certain circumstances, by law data subjects (i.e. anyone the data is about) have the right to:

* Request Access to their personal data (known as a ‘data subject access request’). This enables the client to receive a copy of the personal information we hold and check that we are lawfully processing it.
* Requests correction of the personal data we hold about them. This enables the client to have any incomplete or inaccurate information we hold corrected
* Request Erasure of personal information. This enables the client to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove data where you have exercised your right to object to processing.
* Object to processing of personal information. Clients may object to processing personal information where there is something about the clients’ situation that makes them want to object.
* Request the restriction of processing of personal information. This enables the client to ask us to suspend the processing of personal information about them for example if you want us to establish the accuracy or the reason for processing it.
* Request the transfer of your information to another party. If the client wants to review, verify or correct or request erasure of their personal information, object to processing of their personal data or request we transfer a copy of their data to another party, please contact the Consultant Behaviour Analyst. We may need to request specific information from the client to help us confirm their identity and ensure their right to access the information (or to exercise any of their rights). This is another security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**RIGHT TO WITHDRAW CONSENT**

The limited circumstances where the client may have provided their consent to the collection, processing and transfer of their personal data for a specific purpose, they have the right to withdraw their consent for that specific processing at any time. To withdraw consent, the client should contact the Consultant Behaviour Analyst. Once we have received notification that consent has been withdrawn, we will no longer process that personal data, and any records will be deleted and / or destroyed.

**Cookies**

Our public website use cookies. Incase you aren’t aware, Cookies are pieces of information that a website transfers to the cookie file on your computer’s hard disk. Cookies enable users to navigate around the website and enable us to tailor the content to fit the needs of visitors who have accessed the site.

By visiting the Early Steps website, logging into or using our services you agree that you are happy for us to set cookies. If you are not happy you should either not use our websites or can disable the cookies.

The cookies we use on our website are: Session cookies, which are temporary cookies that remain in the cookie file of your computer until you close your browser at which point, they are deleted and persistent, or stored cookies that remain permanently in the cookie file of your computer.

Cookies do not investigate your computer and obtain information about you or your family or read any material kept on your hard drive. Cookies cannot be used by anyone else who has access to the computer to find out anything about you, other than the fact that someone using the computer has visited a certain website. Cookies will not be used to contact you for marketing purposes.

For more information about cookies (including how to set browsers to reject cookies) please visit the website set up by the Interactive Advertising Bureau (Europe) at www.allaboutcookies.org.

Facebook – a third party social media platform that also supports its own advertising network. Cookies originating from Facebook allow us to focus our Facebook advertising specifically to people who have already visited our site who have not signed up, as well as users determined by Facebook to be similar to our site’s visitors.

We also use Facebook to identify users who may be similar to our existing users. This is done through an anonymous and encrypted process. User data is provided by Totally Taylored and once a ‘lookalike’ audience of Facebook users is created the data provided by us is deleted. We then focus advertising on the Facebook network specifically to this audience.

Google AnalyticsTM- a third party tracking service collects information about how our website is used. We use information to report on usage and volume statistics. We have no access to or control over these cookies. Information about Google AnalyticsTM can be found at: http://www.google.com/intl/en/analytics/privacyoverview.html.

Google Adwords – a third party advertising system that tells us tell a user arrived on our site by clicking on a paid advert. Cookies originating from Adwords also give us power to serve ads on the Google network specifically to people who have already visited our site and not signed up.

You can also opt-out of a number of targeted advertising cookies by visiting these opt-out pages: National Advertising Initiative and Google. This opt-out won’t stop advertising companies from showing you banner ads, but it will prevent them from personalising their banner ads to you specifically.

**Social Links**

On our website we use links to ‘social sites’ – Twitter, Facebook, and LinkedIn.

When you click on these links these sites are likely to be collecting information about what you are doing all around the internet by setting one or more of their own cookies.

In some cases, these sites will be registering the fact that you are visiting Early Steps and the specific pages you are on, even if you don’t click on the link if you are logged into their services, like Google and Facebook.

Early Steps is not responsible for the data generated by or processed by such third parties. Therefore, you should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt-out, or delete, such information.

**Your Rights**

You may always opt not to disclose certain personal information, but that may mean we will be hindered in our ability to assist you.

You can also ask to opt-out of having personal identifiable information used for certain purposes, including promotional communications, newsletters etc.

You have the right to ask us not to process your personal data for marketing purposes.

You can exercise your right to prevent such processing by following the opt-out instructions, which will be clear and obvious on the forms, or emails we use to collect your data. You can also exercise the right at any time by contacting us by email.

Detailed information about your rights under UK Data Protection legislation on the UK Information Commissioner’s website at www.ico.gov.uk.

**Changes to our Privacy Policy**

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

If you have a question, comment or complaint about our Privacy Policy please contact us by email.