

Sure Start Privacy Notice

DOWN SureStart are committed to protecting and respecting your privacy.

This privacy notice explains when and why we collect personal information about you, how we use it, when we may disclose it to others, who we share it with, how we keep it safe and secure and your rights and choices in relation to your information.

If you have any questions regarding this privacy notice and how we use your information you can speak to DOWN SureStart, or send your query by email to down.surestart@setrust.hscni.net.

Who are we?

Sure Start is a government led initiative aimed at giving every child the best possible start in life and offers a broad range of services and programmes, focusing on family health, early years care and education and improved well-being to children aged 0-3 years.

Each Sure Start project works with parents as well as statutory agencies and community-based organisations from the area, to design and deliver a range of services that best meet local need and involves a wide range of multi-disciplinary professionals who collectively deliver on the main services offered by Sure Start.

There are six core elements provided in all Sure Start projects and these are;

- Outreach and home visiting services, to make contact as early as possible in a child's life and draw families into using other services;
- Family support including befriending, social support and parenting information, both group and home based;
- Good quality play, learning and childcare experiences for children (both group and home based);
- Primary and community health care and advice;
- Speech language and communication support;
- Support for all children in the community recognising their differing needs.

Types of services and support offered by Sure Start may include:

- antenatal support and advice
- postnatal support, including breastfeeding
- classes for babies and young children such as baby massage, baby yoga and play sessions
- programmes for parents such as parenting courses, nutrition, nurturing, fathers groups and support for ethnic minority families
- support from midwives, health visitors and speech and language therapists

How do we collect information from you?

We obtain information about you in the following ways:

- During the registration process, when we collect information relating to you, your children and the services you may be interested in accessing.
- During the delivery of Sure Start Services when we collect information relating to the services we have delivered to you and/or your family. This information is held in a manual Family File.

Who do we share information with?

- **Our funders.**
 - Sure Start is funded by the Department of Education in Northern Ireland. The Health and Social Care Board in Northern Ireland monitors and supports each Sure Start area. We only permit these organisations access to statistical information, and we will never pass on your personal information, unless we are legally obliged to do so or if you have specifically consented to the transfer.
- **Health Professionals who deliver services at Sure Start and other HSC Trust Health professionals.**
 - Sure Start facilitates access to the services of Health professionals, such as
 - Health Visitor
 - Midwife
 - Social Worker
 - Speech and Language Therapist

As you have registered with Sure Start and have opted in to access services this means we may need to share some details with the Health professionals in order to have the service delivered. We only share the minimum amount of information necessary and will only share information if you have opted to access this service.

- **Service Providers delivering services to you, on our behalf.**
 - Sure Start may contract with outside organisations to provide a service on our behalf. These services will be offered to our registered users and if you express a wish to access the service, we may, depending on the type of service offered, need to share some limited information with the service provider. You will have the right to opt in to this service. Services such as 'Homestart' * or 'Lifestart'* would fall within this category or provider.
- **Monitoring Outcomes**
 - Sure Start Workers may ask you to take part in Outcome Star Monitoring; if you agree to participate in this some of your information (Sure Start Family Reference Number and Date of Birth) will be held on the Outcome Star System. Once the Star monitoring has been completed your information will be deleted after the end of the financial year.
 - Outcome Star is a system hosted and managed within the UK by a third party provider known as Triangle Consulting Social Enterprise Ltd and there is a contract in place between Health and Social Care Board and Triangle Consulting which includes the necessary clauses covering data protection.

- **External Parties**

- Occasionally, we may be contacted by organisations who may wish to contact you, for example, Universities that may wish to conduct research or seek your views on the services you have accessed. We will never provide your contact details to any 3rd party, unless you agree to participate in the study and permit us to pass your contact details on.

How we use your information

We may use your information for a number of different purposes, which may include:

- Providing you with the six core elements of Sure Start, products or information that Sure Start has been established to deliver to you and your family (see '**who are we**')
- To enable Sure Start to facilitate access to services you are entitled to access, such as Health Services, which you have opted to access
- Keeping a record of you and your families relationship with us (for a limited period of time)
- Conducting analysis to ensure we are delivering good quality services to you and your family
- Seeking your views or comments on the services we provide
- Notifying you of changes to our services
- Communicating with you to advise you of courses or events that you may be interest in accessing.
- Providing our funders with access to the minimal amount of statistical information to allow them to monitor the quality of the service we deliver
- For equality monitoring purposes
 - We only permit anonymised statistical information to be accessed by the Department of Education, and the Department of Health who monitor and support our activities.

Social Media and Images

- From time to time Sure Start may wish to use photographs or video taken of you/your child for press releases or promotional purposes. These images will be used to positively promote Sure Start and the activities and events that it provides to local communities across Northern Ireland. A notice will be placed within each Sure Start prior to any event where we plan to either film or photograph activities that involve Sure Start participants.
 - If you do not wish to be filmed or have your picture taken, arrangements will be in place locally that will allow you to still fully participate and benefit from the activities and events.
 - By participating in promotional events ('opting in'), where photographs or video is being taken, you are consenting to Sure Start using those images for promotional purposes and to publicise our services and facilities.

Who has access to your personal information?

- Only Sure Start staff can access all the information we hold about you, and access is restricted.
- As previously explained at '**who do we share information with**', it is necessary to share limited information with others who deliver a service on our behalf, for your benefit, and which you have opted to access.
- We do not share your information with third parties for marketing purposes. However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy and which are in keeping with the six key services Sure Start delivers (such as contractors delivering a Sure Start related course which you have opted to access)
- These external providers may include; Third parties working on our behalf: we may pass your information to our third party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf which you have opted to access. As previously stated, when we use these third parties, we disclose only the personal information that is necessary to deliver the services you wish to access and we have a contract in place that requires them to keep your information secure and which prevents them from using it for their own purposes.
- We will not release your information to third parties unless we are required to do so by law, for example, by a court order, a child protection concern or unless you have consented to share the minimal amount necessary in order to access the service they are offering.

Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant to Sure Start and the processing we undertake;

- **Specific Consent**
 - Where you have provided specific consent for us to use or share your personal information.
- **Legal obligation**
 - Occasionally, we may be ordered by a court to release information.
- **Vital interests**
 - In an emergency, for example in the case of medical emergency, we may be required to share information with the emergency services.
- **Legitimate interests**
 - Where it is necessary to achieve our or others' legitimate interests. We consider our legitimate interests to be the delivery of Sure Start services to our Registered users. We consider the benefits to the wider Community in which we deliver services, to also have a legitimate interest in ensuring Sure Start continues and thrives within the Community it is based for the benefit of the resident population.
- **Performance of a Contract***
 - On occasion we will offer services that are delivered by an organisation external to Sure Start. When we do this, we will enter into a contract with this service

provider, and to enable them to perform their tasks, we may be required to share the minimal amount of information about you, with them. We will only do this if you have opted in to receiving the service, and we will, as already stated, ensure there are safeguards in place so your information is secured and is not used by the contractor for their purposes.

***Note.** Sure Start holds your information in both electronic form, and in paper form (your registration form for example). Please see '**where is your information held and how is it held**', for further information.

Contacting you

- We will only communicate with you by email, by post, by telephone and by text if you have explicitly provided your prior consent at registration and those communications will relate to the delivery of Sure Start services. We will no longer contact you once you have de-registered from accessing Sure Start services ('opted out').

Your Rights

UK Data Protection law, gives you certain rights over your personal information. Here is a summary of what rights you have when it comes to the information Sure Start holds about you.

- Right to access your information
 - You have a right to request access to the personal data that we hold about you and a copy of that information (exceptions apply).

If you ever wish to exercise this right, please write to the Sure Start Data Protection Officer (DPO) at the email address provided and describe what information you want to access. Access is free of charge (exceptions apply).

Right to have your inaccurate personal information corrected

- You have the right to have inaccurate or incomplete information we hold about you corrected or amended. You can ask to see the information we hold about you at any time to check that it is accurate. It would very much assist Sure Start if you could let us know at any time if there is a change in your registered details, for example, if you change your contact information or your address, or if there are any other changes we need to be made aware of.

Right to restrict use

- You have a right to ask us to restrict the processing of some or all of your personal information if you are concerned about the accuracy of the information or if Sure Start is using your information in a way in which concerns you.(exceptions apply)

Right of erasure

- You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to (exceptions apply)

Data Retention and Destruction Periods

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for, is managed by the Sure Start Records Management Policy. (you can access a copy of this policy from the DPO)

- In general, if you have accessed Sure Start services, your records are destroyed eight years from the date of the last entry into the file.
- If you have registered with Sure Start, and therefore opted in to accessing services, but have not accessed any services within a 1 year period, we will contact you to see if you wish to remain registered with Sure Start. We will give you the opportunity to de-register by contacting us and advising us that you now wish to opt out of accessing services.
- Children when they reach their fourth birthday and finish their current programme will automatically be deregistered.
- For those families that have registered but have never accessed services, their information will be deleted following de-registration on the child's fourth birthday.

MANUAL AND ELECTRONIC DATA

Where is your information held and in what format is it held

- Sure Start holds information in both electronic form, and in paper form.
 - When you register with Sure Start, we ask you to complete a registration form. This is retained securely by Sure Start at each Sure Start premises.
 - A family file is held which holds the registration form and other notes from any professionals you may have worked with while registered with Sure Start.
 - We will also register you on the Sure Start System which is maintained by the Health and Social Care Board. No one other than Sure Start staff can access the personal data held on this database and the Health and Social Care Board can only access statistical information from the database.

Keeping your information safe

As required by the Data Protection Act 2018, Sure Start takes steps to ensure that we have in place appropriate technical and organisational measures to protect your information.

- In respect of your registration form and any paper records we hold, access to these are restricted to those staff that require them in order to do their job and they are locked away at all times.
- In respect of any electronic records we hold about you, these are secured on a database which has the most up to date security available. Sure Start also restricts access to these electronic records to those staff that require access to them in order to do their job and each PC has a strong password, which is not shared.

Once we receive your information, we make our best effort to ensure its security on our systems and within each Sure Start building. If you have any concerns about the security of your information, please speak to the DPO.

Changes to this Policy

Any changes we may make to this policy in the future will be posted on our Sure Start website so please check this page occasionally to ensure that you're happy with any changes. If we make any significant changes we'll make this clear on this website.

Review of this Policy

We keep this policy under regular review. This policy was last updated in December 2020 and adopted by DOWN SureStart on 9th December 2020.

Right to Complain

If you are unhappy with any of the information here, or any element of the proposed use, storage sharing and retention of your data by Sure Start, you have the right to complain to the Information Commissioners Offices and the contact details are;

The Information Commissioner's Office – Northern Ireland
3rd Floor
14 Cromac Place
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: ni@ico.org.uk