

# Privacy Notice

## St Piers' Farm Experience visitors



**This Privacy notice is intended to inform all people who may attend The Farm Experience, how Young Epilepsy/St Piers will use their personal data.**

If you have any queries or concerns, further guidance may be accessed in the following ways:

- The Farm visit team
  - ✉ [FarmVisit@stpiers.org.uk](mailto:FarmVisit@stpiers.org.uk)
  - ☎ 01342 832243 ext. 392
- Susan Turner, Data Protection Officer (DPO) & Information Governance Manager.
  - ☎ Ext. 286.
  - ✉ [sturner@youngepilepsy.org.uk](mailto:sturner@youngepilepsy.org.uk) or [dpo@youngepilepsy.org.uk](mailto:dpo@youngepilepsy.org.uk);

## Information Governance standards

Please find below details of the standards Young Epilepsy/St Piers meets when using personal data.

### Data Protection

Young Epilepsy/St Piers endeavours to meet the highest standards when collecting and using personal information. We are committed to upholding the standards and regulations embodied in the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR). Personal data will therefore at all times be: -

- ✓ Processed lawfully, fairly and in a transparent manner.
- ✓ Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- ✓ Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- ✓ Accurate and, where necessary, kept up to date.
- ✓ Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- ✓ Processed in a manner that ensures appropriate security.

Young Epilepsy/St Piers will furthermore: -

- ✓ Be responsible for and be able to demonstrate compliance with the DPA 2018 and the UK GDPR.

### Individual Rights

Under the DPA 2018 and the UK GDPR you have the right to:

- Be informed (the purpose of this Privacy Notice).
- Access your information.
- Rectify inaccurate or incomplete data.
- Request the erasure of your information.
- Restrict how your data is processed; and
- To object to the use of your information.

There are two additional rights with regard to automated decision making and data portability. With regard to these Young Epilepsy/St Piers will not use staff information for automated decision making or profiling and do not undertake data portability.

Should you wish to exercise any of your Rights, please contact the DPO using the contact details provided.

### Further information

Your information is held in a confidential manner with limited access, in accordance with the DPA 2018 and the UK GDPR. We are committed to ensuring that personal data is secure. In order to prevent unauthorised access or disclosure, data will be held on secure servers/cloud storage, and we have also put in place appropriate physical, electronic and managerial safeguards to further protect hard copy records.

Information will not ordinarily be processed overseas unless there is a specific request for us to do so, such as a need to send information to an individual or organisation in another country. If information is to be sent overseas, then this will be done in accordance with the DPA 2018 and the UK GDPR and under the guidance of the DPO and the IT department.

Young Epilepsy/St Piers is registered with the Information Commissioner's Office (ICO) under our legal name of the National Centre for Young People with Epilepsy. Our registration number is Z5611618.

Please note that should you be unhappy about the way we implement data protection you have the right to lodge a complaint with the ICO <https://ico.org.uk/>

### **Caldicott Principles statement**

At Young Epilepsy/St Piers we apply the Caldicott Principles to health and social care data, so that every flow of identifiable confidential information is regularly justified and routinely tested against the principles developed in the Caldicott Report.

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|-------------|---|
| Principle 1 | Justify the purpose(s) for using confidential information.  |
| Principle 2 | Only use it when absolutely necessary.  |
| Principle 3 | Use the minimum that is required.   |
| Principle 4 | Access should be on a strict need-to-know basis.  |
| Principle 5 | Everyone must understand his or her responsibilities.   |
| Principle 6 | Understand and comply with the law.   |
| Principle 7 | The duty to share information can be as important as the duty to protect patient confidentiality. |
| Principle 8 | Inform patients and service users about how their confidential information is used.               |

## Data Security & Protection Toolkit

As an NHS Business Partner, Young Epilepsy/St Piers also completes the NHS' Data Security & Protection Toolkit, which enables organisations to measure and publish their performance against the National Data Guardian's ten Data Security Standards.

All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance that they are practising good data security, and that personal information is handled correctly.

## Amendments and supplements

We may update this privacy notice from time-to-time by posting a new version on the intranet. You should occasionally check these pages to ensure you are aware of the changes. For more information about how the privacy notice is changed please contact the DPO using the details provided.

Please note that there may also be supplementary privacy notices, such as the Employee Covid Privacy Notice, which operated during the pandemic. These too will be available on the intranet.

# Privacy Notice

Please find below details of the information we keep and how we use it.

## Information kept by Young Epilepsy/St Piers.

Young Epilepsy/St Piers may keep the following information on you:

- Personal details, such as your name and contact details.
- Medical information, such as any allergies or medical conditions you may disclose.
- Financial information, relating to the fee you have paid.
- Any other information that you choose to share with us.

This information may be provided to us on the booking form or in person during the visit.

## What this information is used for.

This information may be used :

- To facilitate your visit to St Piers Farm.
- For administrative and management purposes.
- To meet our legal obligations, such as retaining financial records in line with HMRC guidance.

## Source of the personal data

The information will be either obtained directly from you or from the person who you have nominated to make the booking.

## Sharing information.

Young Epilepsy/St Piers does not routinely share visitor information other than in the exceptional instances outlined below.

- **Internal access** - within the organisation, appropriate individuals will be able to access your records. For example, the Finance team will need a record of your booking for accounting and audit purposes.
- **Insurers** - should an issue arise, or an insurance claim be made your data will be shared with our insurers and/or those authorised to act on their behalf with the necessary information to investigate or respond to the claim.
- **Inspections/Audits** - Young Epilepsy/St Piers is subject to a number of regulatory standards, such as the CQC, Ofsted, Charity Commission, HMRC etc. and may therefore allow its records to be inspected as part of that process, to ensure that Young Epilepsy/St Piers is meeting the necessary standards. Inspectors/auditors will be given access to records but only provided with copies in exceptional circumstances, for example, if a safeguarding concern is identified or it is necessary for audit completion.
- **Legal obligations** - we are also legally obliged to share certain information and, in such cases, will not seek your consent to do so. For example, all safeguarding concerns must be disclosed to the relevant organisations and individuals, such as the Local Authority.
- **Data Processors** - we use data processors; this is an organisation responsible for processing personal data on behalf of Young Epilepsy/St Piers. It does so under strict instruction from us and our contract ensures that the standards required by Young Epilepsy/St Piers, the DPA 2018 and the UK GDPR are upheld at all times.

An example of a data processor is the company that provides the programme upon which all contact with third parties such as supporters, donors etc. is recorded.

- **Complaints/Reviews** - records may also be accessed by other staff or third parties, when a complaint or other issue is being reviewed or investigated.

We may also anonymise some of the information we hold on visitors for statistical purposes and so that we can share the results more widely. You will not be identifiable in these records.

## Records retention

Records will be retained for seven years. This is in accordance with legislative and regulatory guidance, such as that from HMRC Guidance. In exceptional cases where records are needed for insurance purposes they will be kept in accordance with the requirements of our insurers and/or until a claim is settled.

## Lawful basis

The DPA 2018 and the UK GDPR require us to have a lawful basis for processing your data and these are outlined below.

### Consent/Explicit consent.

Any information you provide to us is processed on the basis that its provision indicates explicit consent for us to process it as outlined above.

### The legitimate interests of Young Epilepsy/St Piers.

It is in Young Epilepsy/St Piers' legitimate interests to process Visitor data for administrative and management purposes. This has been balanced against the individual's interests, rights and freedoms, so there is minimal impact on privacy.

#### Contract

As part of your employment contract, you will have agreed to supply us with specified information, and we will use this in the manner explained. This may include fulfilling contractual provisions such as paying you or recording your sickness absence.

#### Medical purposes.

For example, for, preventive or occupational health, a working capacity assessment, medical diagnosis or the provision of health or social care.

#### Legal claims and obligations

Where the processing is necessary to establish, defend or exercise legal claims or where ordered by a court or tribunal.