



Data Protection Policy

Stepping Stones makes use of personal information - about our clients, employees, volunteers, donors and others - in a variety of ways as part of providing our service.

Stepping Stones is committed to using personal data appropriately and to ensuring that personal data is protected in accordance with best practice and Data Protection laws.

Stepping Stones will keep your information for as short a period as possible.

- Stepping Stones Privacy Notice explains what personal data is collected, why it is collected and how it is used. It also explains what control individuals have over their own personal data and the procedures we have in place to protect it.
- The Privacy Notice is visible on our Website (www.steppingstonestrowbridge.co.uk) and shared with and available to all service users and service providers.
- A nominated Data Protection officer will take the lead on data compliance at Stepping Stones. This will include risk assessments to ensure that appropriate measures remain in place to keep personal data secure. The nominated Data Protection officer is Debbie Wickham
- Stepping Stones will endeavour to only use Data processors who can offer sufficient guarantees that their processing will meet GDPR requirements.
- All Stepping Stones staff members receive training and advice on Data Protection and compliance

Data Storage

- All paper documents are kept in locked filing cabinets with access restricted only to members of staff who require access to fulfil their role.
- All access to IT and Tapestry Software is password protected and user accounts are restricted to and only created for staff where access is required to fulfil their role.

Policy for Requesting Access to Data

As outlined in our Privacy Statement

Stepping Stones is happy for anyone to check the information held about them and (where parental responsibility is held) a child at any time.

If you wish to:

- Request access to, amend or correct the personal data we hold
- Request we transfer your personal data to another person/service

First contact us either:

- In person at Stepping Stones, Longfield Children's Centre, Broadcloth Lane, Trowbridge, BA14 7HE
- In writing - at the above address
- By phone 01225 350015
- By email admin@steppingstonestrowbridge.co.uk

In all cases Stepping Stones will respond to your request within one month.

To request that we delete your personal data or make corrections to

- First contact us (as above)
- Our nominated Data protection officer will firstly check/confirm your identity and then confirm if:

There are any legal or statutory requirements why we would need to retain any of the personal data eg. By law we must keep certain records for a minimum period of time. You are welcome to check with us what this covers and if any of the information we hold either on you or a child is covered by a legal requirement.

There will be a need to inform other data processors that we no longer have access to your personal data.

There will be any implications to the provision of our service as a result of withdrawing your consent or deleting your data.

- Further to confirmation of action required.

Area of consent/data will be deleted within one month

In the event that the team have been unable to address any concern then a complaint should be raised through the Stepping Stones Complaints procedure.

Policy for a Data Breach.

A Data breach is defined as the accidental or unauthorised destruction, loss, alteration, disclosure of, or access to personal data.

The procedure to be followed relating to a potential data breach under GDPR legislation.

- The nominated Data Protection Officer must be notified of any suspected or potential breach so they can determine if an actual breach has occurred.
- The Data Protection Officer will investigate and assess the potential breach considering the impact on the individuals and organisations concerned.
- The Data Protection Officer will inform the chair of the Management Committee clarifying:-

The nature of the Personal Data breach

The number of individuals/personal data records concerned

A description of the likely consequences of the personal data breach.

A description of the measures taken, or proposed to be taken

- An action plan will be agreed and measures taken to resolve the breach and mitigate any possible adverse effects.
- Individuals concerned will be notified without undue delay
- All breaches are to be documented, even if they do not all need to be reported.

- In circumstances where the Data Breach could result in
 - Discrimination
 - Damage to reputation
 - Financial loss
 - Loss of confidentiality
 - Economic disadvantage
 - Social disadvantage

Within 72 hours of becoming aware of the breach Stepping Stones has a duty to inform

The Information Commissioners Office (ICO) at Wycliffe House, Water Lane,
Wilmslow, Cheshire SK9 5AF