PARTICIPANT **DATA PRIVACY NOTICE**

**May 2018**

**HIVE STUDIOS**

**1.Your personal data – what is it?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

**2.Who are we?**

Hive Studios is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes. Hive Studios are registered under the Data Protection Act 1998 and The General Data Protection Regulation (EU) 2016/679 under the ICO (Information Commissioners Office).

**3.How do we process your personal data?**

Hive Studios complies with its obligations under the “GDPR” by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

**4. How your information will be used**

* Hive Studios community development programmes and assistive technology programmes need to keep and process information about you for normal project co-ordination, delivery, monitoring and evaluation purposes. The information we hold and process will be used to help ensure you get the most value from your participation in the project. Information will be stored securely (in a locked cabinet) offline in your individual participant file; and on an excel sheet stored on a password protected computer. The information we hold on you is accessible only by project staff and is used to help tailor a programme to each individual based on their specific needs.
* We will keep and use it to enable us to manage our relationship with you effectively, lawfully and appropriately, during the duration of your participation. This includes using information to enable us to comply with any legal, safeguarding or funding requirements, and to protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
* We keep a data record on each participant, and we also may keep a baseline, midterm and completion survey which tracks the progress of participants throughout the duration of the programme.
* Discrete data is shared between Hive Studios, the Housing Executive and the Trust’s Occupational Therapy Team in terms of participant recruitment/enrolment and progress, on an occasional basis – as part of the setup, delivery and monitoring requirement of the project.
* Discrete data may also be shared with an external agency in the case of a consented referral or to comply with our safeguarding obligations.

**5. What information do we hold**

* Much of the information we hold will have been provided directly by you during the enrolment process, i.e. Personal Contact Details and Home Address, Disability or Health Condition status. This data is recorded on the Participant Specification Forms, and stored securely in an excel document on a password protected device. Other personal/private information may have been provided through baseline/mid-term & completion assessments (participant’s progress in terms of a variety of metrics) or through personal disclosures with project staff. This information is stored in locked cabinets, accessible only by project staff and securely on a password protected computer.
* In addition to this information, should we register any participants for accredited courses through Hive Studios Accredited OCN training centre, we will also collect participant contact details, address, personal medical information (should reasonable adjustment be required), emergency contact information and a parental signature (should participants be under 18). This information is stored securely in a locked cabinet and on a password protected computer (excel sheet).
* Additionally we will also store Access NI Enhanced Disclosure certificates (and possibly corresponding ID) for our volunteers, facilitators and participants-turned-facilitators. These will be stored securely in a locked cabinet (accessible only by project staff) at all times.
* Where necessary, we may keep additional private information relating to a specific piece of work delivered through the programme. For example there may be email communication (between HE / Hive Studios or the OT’s) detailing specific requirements/ issues / problems / outcomes etc in relation to participants.
* Occasionally, and dependent on the nature of the programme or activity engaged in – we may ask your consent to capture images / audio or video of you engaged in an activity. This may be used for the purposes of validating funding, for promotional purposes or for the reporting / evaluation of projects. This data is collected and stored digitally on a password protected computer (accessible only by project staff). Audio / video data may be processed using a audio/video editing package to create an edited and improved cut or treatment for presentation purposes. Images may be used online via social media accounts or online platform to advertise or promote the project. Images may also be used in the production /presentation of internal reports or evaluation documents.
* Internally Hive Studios facility operates a CCTV system for the prevention of crime and the protection of staff and property. The recordings are stored internally on an encrypted drive and are inaccessible by anyone except the admin. CCTV is present only in public areas and is not reviewed on a continual basis, it is used / referred to primarily in reaction to an event or incident being reported. This CCTV data is not shared with anyone. Hive reserve the right to use footage solely on the premise of protecting the organisation from legal action and our staff and customers from harm or unlawful action.
* Should we collect and process any data based on your consent, you have the right to withdraw that consent at any time.
* **6. Sharing your personal data** Your personal data will be treated as strictly confidential. Only project staff, internally, have access to the data. Discrete data may occasionally be shared with any dedicated funder / management agent or delivery partner such as the Housing Executive or the Trusts OT Team, in terms of participant progress, on an occasional basis – as part of the monitoring requirement. Discrete data may also be shared with Hive Studios’ designated safeguarding officer or an external agency in the case of a consented referral or to comply with our safeguarding obligations.

**7. How long do we keep your personal data?** We keep general data in accordance with the guidance set out within UK & EU Data Protection Legislation. Project participant data is retained for the duration as specified by the funder (and relative to each specific funding programme). No data is retained for longer than it absolutely has to be, and when its use is deemed no-longer necessary – it will be securely and irrevocably destroyed.

**8. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

* The right to request a copy of your personal data which the holds about you
* The right to request that they corrects any personal data if it is found to be inaccurate or out of date
* The right to request your personal data is erased where it is no longer necessary for us to retain such data
* The right to withdraw your consent to the processing at any time
* The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
[*Only applies* where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means]
* The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
* The right to object to the processing of personal data, (where applicable)
[*Only applies* where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
* The right to lodge a complaint with the Information Commissioners Office (UK) or Data Protection Commissioner (Ireland)

**9. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice. The new notice will explain the ***new use*** of your personal data prior to commencing the processing. It will set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

**10. Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact:

Kevin Hippsley, Hive Studios, Rath Mor Centre, Bligh’s Lane, Derry, BT480LZ, T: 028 7127 7487.

You can contact the Information Commissioners Office (UK) on 0303 123 1113; via email https://ico.org.uk/global/contact-us/email/ or by writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

You can contact the Data Protection Commissioner (Ireland) on +353 (0761) 104 800; via email info@dataprotection.ie or by writing to: The Data Protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois, R32 AP23.