



Privacy Policy


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1. Policy Statement

Bright Steps Devon CIC is committed to respecting your privacy and protecting your personal information. We only collect and use information that we need to deliver safe, effective support and to meet our legal responsibilities. We keep personal information secure, only share it where lawful and necessary (including for safeguarding), and we do not sell personal data. We are registered with the Information Commissioner's Office (ICO) and uphold individuals' rights under UK GDPR.

2. About This Privacy Notice

This Privacy Notice explains how Bright Steps Devon CIC uses personal information. It sets out:

- what information we collect
- why we collect it and how we use it
- who we may share it with
- how long we keep it
- your rights and how to contact us

This Notice applies to young people (8–25), parents/carers, referrers, staff, volunteers, trustees and associates where Bright Steps acts as the Data Controller.

3. Who We Are and How to Contact Us

Bright Steps Devon CIC ("Bright Steps") provides teaching, mentoring and enabling support to young people aged 8–25. For the purposes of data protection law, Bright Steps Devon CIC is the Data Controller for the personal information described in this Privacy Notice.

Contact (Data Protection):

Bright Steps Devon CIC

Email: office@bright-steps.co.uk

Telephone: 07932 409718

Address: Seasons, Kenton, EX6 8ND

ICO Registration Number: ZC001282

If you have any questions about this Privacy Notice, or you want to exercise your rights (see Section 10), please contact us using the details above.

4. What Personal Information We Collect

Bright Steps collects personal information that is necessary to deliver safe and effective support and to meet our legal and safeguarding responsibilities. The type of information we collect depends on the nature of the service and the individual's relationship with us.

4.1 Young People

We may collect:

- Name, date of birth and contact details
- Emergency contact details
- Information about support needs and agreed goals
- Education information relevant to support (including SEND or EHCP information where shared with us)
- Health, medical or wellbeing information relevant to safe service delivery
- Session notes and progress information
- Risk assessments and safeguarding information where required

4.2 Parents and Carers

We may collect:

- Names and contact details
- Information relevant to supporting the young person safely and appropriately

4.3 Referrers and Partner Professionals

We may collect:

- Contact details and professional role
- Referral information relevant to service delivery and risk management

4.4 Staff, Volunteers and Associates

We may collect:

- Recruitment and engagement information (including DBS-related information where applicable)
- Health, medical or wellbeing information (where relevant)
- Training and supervision records
- Payroll and financial information where required

We only collect personal information that is relevant, proportionate and necessary for the purpose it is required.

5. How We Use Personal Information

Bright Steps uses personal information to support safe, effective service delivery and to meet legal and safeguarding responsibilities. This includes:

- Managing referrals, initial enquiries and onboarding
- Planning and delivering mentoring and enabling support
- Communicating with young people, parents/carers, referrers and relevant professionals

- Maintaining appropriate records, including session notes and progress information
- Completing and reviewing risk assessments and support planning
- Managing safeguarding concerns and taking action to protect children and young people where required
- Monitoring and improving service quality, outcomes and effectiveness (using anonymised information wherever possible)
- Meeting legal, regulatory, financial and governance obligations (including employment and tax requirements)

We do not use personal information for automated decision-making or profiling that produces legal or similarly significant effects.

6. Our Legal Basis for Processing Personal Information

Bright Steps processes personal information in accordance with UK GDPR and the Data Protection Act 2018. We rely on one or more of the following lawful bases, depending on the circumstances:

- **Contract** – where processing is necessary to deliver agreed services to a young person, family, commissioner or referrer.
- **Legal Obligation** – where we must comply with legal duties, including safeguarding, employment, tax and regulatory requirements.
- **Legitimate Interests** – where processing is necessary to operate our services safely and effectively, provided this does not override an individual's rights and freedoms.
- **Consent** – where processing relates to optional matters such as photographs, video, publicity or non-essential communications. Consent can be withdrawn at any time.

Where we process special category data (such as health information, SEND or EHCP details, safeguarding information or social care involvement), we apply the additional legal conditions required under UK GDPR and ensure appropriate safeguards are in place.

If you would like more information about the lawful basis that applies to your specific circumstances, please contact us using the details in Section 3.

7. Safeguarding and Confidentiality

Bright Steps treats personal information as confidential and will only share it where lawful and necessary.

However, as an organisation working with children and young people, we have a duty to safeguard and promote welfare. This means that if we believe a child or young person is at risk of harm, we may need to share relevant information with appropriate agencies, such as:

- A school or designated safeguarding lead
- Children's social care
- Health professionals
- The police

This may occur with or without consent, depending on the circumstances and the level of risk. Where it is appropriate and safe to do so, we will aim to be open about what information is being shared and why.

For young people aged 16 and over, we will generally treat the young person as the primary decision-maker about their information, unless safeguarding or legal requirements require otherwise.

We will always seek to share only the minimum information necessary for the purpose.

8. Who We Share Personal Information With

Bright Steps will only share personal information where it is lawful, necessary and proportionate.

Depending on the circumstances, we may share information with:

- Schools, colleges and education providers
- Local Authorities and commissioning bodies
- Health and social care professionals
- Safeguarding agencies where there is a concern about risk of harm
- Professional advisers (such as accountants or payroll providers)
- Trusted IT service providers who host or support our secure systems

Where we use third-party service providers to process information on our behalf, we ensure appropriate contractual and security safeguards are in place.

We will never sell personal information, and we do not share personal information for third-party marketing purposes.

9. How We Keep Personal Information Secure

Bright Steps takes appropriate technical and organisational measures to protect personal information against accidental loss, unauthorised access, misuse, alteration or disclosure.

Our security arrangements include:

- Use of secure organisational systems for email and document storage
- Controlled access permissions so that only authorised individuals can access information on a "need to know" basis
- Password protection and account security controls
- Secure storage of any paper records
- Secure deletion or shredding of records when no longer required

All staff, volunteers and associates are required to handle personal information carefully and in accordance with our internal data protection and confidentiality policies.

If a personal data breach occurs that is likely to result in risk to individuals, we will act promptly and, where required, notify the ICO and affected individuals in accordance with data protection law.

10. How Long We Keep Personal Information

Bright Steps keeps personal information only for as long as it is necessary for the purpose for which it was collected, and in line with our internal Records Retention Schedule.

As a general guide:

- Young person records are usually retained for 6 years after support ends, and longer where safeguarding, legal or risk considerations require.
- Safeguarding records are retained in line with statutory guidance and organisational safeguarding procedures.
- Staff and volunteer records are retained in accordance with employment and safeguarding requirements.
- Financial records are retained for a minimum of 6 years in line with legal and tax requirements.

Once information is no longer required, it is securely destroyed or permanently deleted.

11. Your Rights

Under the UK General Data Protection Regulation (UK GDPR), you have rights in relation to your personal information. These include the right to:

- **Access** the personal data we hold about you
- **Request correction** of inaccurate or incomplete information
- **Request erasure** of your information, where this is lawful and appropriate
- **Request restriction** of processing in certain circumstances
- **Object** to processing where we rely on legitimate interests
- **Request portability** of certain data, where applicable

These rights are not absolute and may be limited in some circumstances, for example where disclosure would affect the rights of others or conflict with safeguarding or legal obligations.

To exercise your rights, please contact us using the details in Section 3. We will normally respond within one calendar month of receiving your request and verifying your identity where necessary.

12. Complaints

If you have any concerns about how Bright Steps handles your personal information, we encourage you to contact us in the first instance using the details in Section 3. We will take your concerns seriously and aim to resolve any issues promptly and fairly.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK's independent authority for data protection.

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Telephone: 0303 123 1113

Making a complaint to the ICO does not prevent you from seeking a resolution directly with us, and we welcome the opportunity to address any concerns.

13. Changes to This Privacy Notice

Bright Steps may update this Privacy Notice from time to time to reflect changes in legislation, regulatory guidance, organisational structure, or the way we deliver services.

Where changes are significant, we will take reasonable steps to bring the updated Privacy Notice to the attention of those affected, for example by updating our website or providing a revised copy within referral or onboarding documentation.

The most current version of this Privacy Notice will always be available upon request or via our website (where applicable).

14. Appendices

Please refer to GC-01 Data Protection Policy and UK GDPR Policy for further information and GC-01 Appendix A – Records Retention Schedule

15. Document Control and Update Record

Document Information

DOCUMENT TITLE

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DOCUMENT OWNER	Elizabeth Spowage
APPROVED BY	Board of Directors
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REVIEW FREQUENCY	Annual (or sooner if required)
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2. Version Control Record

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2.1	19/04/26	Front/Back Pages	Ver 2.0 issue date & contact details	Liz Spowage - Director

3. Review History (Even if No Changes Made)

REVIEW DATE	REVIEWER	OUTCOME	NOTES