



## **Privacy statement:**

At WALK, we are committed to protecting personal information and we take our responsibilities regarding the security of the information of our stakeholders very seriously.

This privacy statement explains what personal data we collect about you, how and why we use it, who we disclose it to, how we protect it and your rights regarding fair and transparent processing of your personal information.

## **What is included in this privacy statement:**

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**Who is responsible for your data:** Our privacy statement applies to all the data that WALK collects and uses.

Our office is at: WALK, 1 Longmile Road, Walkinstown, Dublin 12

WALK is the Data Controller for all personal data collected and used by WALK under GDPR and the Data Protection Act 2018.

WALK has a designated Data Protection Officer who can be contacted at [DataProtection@walk.ie](mailto:DataProtection@walk.ie)

**Personal data we collect about you:** When using the term personal data in our privacy statement, we mean any information that relates to you which allows WALK to identify you such as your name and address, phone number and email address.

We collect some personal data from you for example when you use or are a family relative of somebody who uses WALK's services. When you are referred to WALK's services. When you work for the organisation, do a work experience placement or volunteer with WALK, when you are a Supplier to WALK or when you use our website.

**The legal basis for processing your data:** The General Data Protection Regulation (GDPR) Principles and Data Protection Act 2018 require organisations to consider the legal basis on which they process your personal data.

WALK processes personal data under the following lawful basis:

Legal obligation: This applies where the processing of personal data is necessary to comply with a legal obligation that WALK is required to meet.

Consent: This applies where you have given your consent for us to process your data for a specific purpose.<sup>1</sup>

Performance of a contract: This applies where the processing of personal data is necessary for the performance of a contract to which you are entering into or are party to.

Vital interests: This applies where the processing of personal data is necessary to protect you or another person.

Legitimate interests: This applies in incidences where the processing of personal data is necessary for ensuring network and information security. Or in protecting property and goods and maintaining the safety of persons in specific circumstances.

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<sup>1</sup> Where you have consented for your data to be used, you have the right to withdraw your consent at any time.

## **Section A: Information for individuals supported by WALK and potential new referrals.**

WALK's goal is to plan and provide a good service to you. In order to do this, we need to collect and keep information about you. WALK works to ensure that we keep information about you private and asks for your consent when sharing your information.

### **1. What type of information may we hold about you?**

We may hold information including: your name, gender, religion, telephone number, address, date of birth, PPS number, medical information, personal plans, education and employment information.

### **2. When do we collect your information?**

We collect your information when you are first referred to WALK and when you are using the services of WALK.

### **3. Why do we need to collect this information?**

- To help plan your service when you are referred to WALK.
- To help deliver a good service to you when you are part of WALK.
- To deal with any emergencies if they should arise.
- To meet WALK's legal requirements.

### **4. Who do we share your information with?**

WALK has a consent form for you to sign, to give your consent about information about you being shared. (See *appendix 1, staff access to personal information*). It might be necessary for WALK to share information about you with the following people:

- The staff who support you.
- Other people who support you, who you have said it is ok for us to share information with. This could include: Family members, Employers, College or other groups or classes, work experience students or volunteers.
- Schools (for individuals on the PEER or REAL Programmes).
- Healthcare professionals e.g. GP, dentist or hospital.
- WALK's funders e.g. the HSE.
- Other organisations, where required, e.g. Department of Social Protection, Local Housing Authority, Decision Support Service or the National Advocacy Service.

### **5. Where do we store your data?**

Personal data on the people we support shall normally be stored in a) files in the service location the person is supported and/or in the clinical office in Long Mile Road, b) on electronic files on the Sharepoint site relevant to where the person is supported, c) on Salesforce for all participants on WALK's PEER or REAL Programmes.

### **6. How long will we keep your information?**

WALK will only keep your personal data for as long as is necessary to fulfil the purpose it is being processed for. All personal data collected by WALK is kept in line with WALK's Record Retention Policy. (See *Appendix 2: A factsheet for individuals supported by WALK. How WALK uses your information*)

## **Section B: Information for families of the people we support**

### **1. What type of information may we hold about you?**

- Information that you supplied to us when your family relative joined WALK's services.
- Information including your name, address, email, telephone number and your relationship to the person who we provide services too.
- Family contact sheets, as records of our communication with you.
- Information about you provided by other services e.g. the HSE.
- We may also hold other information which you have consented to us having or using.

### **2. When do we collect your information?**

We collect your information when your family relative is referred to WALK and when your family relative is using the services of WALK.

### **3. Why do we need to collect this information?**

- To provide an effective service to your family member.
- To provide service information to you.
- To contact you should an emergency arise.
- To protect the vital interests of your family member.
- To comply with legal and / or contractual obligations.

### **4. Who do we share your information with?**

- Frontline staff who provide supports to your family relative. Including Community Connectors and Social Care Workers.
- Medical practitioners and / or healthcare professionals.
- Statutory or regulatory bodies, where required.
- Legal authorities, where required.

### **5. Where do we store your data?**

Personal data about the family members of the people we support are kept centrally on a database with access by administration staff for the purposes of general organisational mailshots and also information is held on the file of the person supported, for example, emergency contact details.

### **6. How long will we keep your information?**

WALK will only keep your personal data for as long as is necessary to fulfil the purpose it is being processed for. All personal data collected by WALK is kept in line with WALK's Record Retention Policy. The timelines regarding record retention are set in line with all relevant legislation and guidelines such as those of the Health Service Executive (HSE).

## **Section C: Information for job applicants and employees (current and former)**

### **1. What type of information may we hold about you?**

Personal Data held by WALK about its employees may include all and any of the following:

- We collect only your Name, address and contact details, PPS number when you apply for a job with WALK. We collect the additional information below during the recruitment process, when you accept a position with the organisation and when you are working for WALK.
- Staff personnel files including interview notes or application form, contract and offer letters, performance development forms and, if applicable, records of any interactions under the headings of grievance and discipline.
- Forms pertaining to internal WALK structures (these include but are not limited to: acknowledgement and awareness of policies, procedures, guidelines and code of practice, probation records and PDS reports.)
- Details of approved absences (career breaks, maternity, parental leave, study leave etc.)
- Details of work record.
- Details of any accidents/injuries sustained on Organisation property or in connection with the staff member carrying out their duties,
- Details of salary and other benefits.
- Training courses completed and qualifications awarded.
- Occupational Health Assessments, health reports and sick certificates.
- CCTV data.
- Email system data.
- Financial data.
- Human resources data (Next of Kin, GP address, driving licence, insurers letters of indemnity, correspondence with solicitors etc.)
- Records of application and appointment to promotion posts.

### **2. When do we collect your information?**

We collect only your name and contact details, including your email and phone number, when you apply for a job with WALK. We collect the additional information above when you accept a position with the organisation and when you work for WALK.

### **3. Why do we need to collect this information?**

- To ascertain your suitability for an employment role.
- To provide you with a contract of employment.
- To facilitate the payment of salary, and calculate other benefits / entitlements (where relevant)
- To provide you with information in relation to your employment role.
- To manage Human Resources, generally.
- To enable WALK to comply with our legal and contractual obligations as an employer including the preservation of a safe and efficient working environment (this includes complying with our obligations under the Safety, Health and Welfare at Work Act 2005 and the 2007 Health and Safety Regulations.)
- To respond to any emergencies, should they arise.

#### **4. Who do we share your information with?**

- Third parties, where we need to share your information in order to determine your eligibility for an employment role.
- Legal authorities, for example in the case of a disclosure order or other relevant regulations.
- Other external bodies, where required, including the Revenue Commissioner and Pension Providers, HIQA and WALK funders.
- The Health and Safety Authority in the event of an accident or incident.

#### **5. Where do we store your data?**

Personal data on staff shall normally be stored on the Employee's personnel file or HR electronic database.

#### **6. How long will we keep your information?**

WALK will only keep your personal data for as long as is necessary to fulfil the purpose it is being processed for. All personal data collected by WALK is kept in line with WALK's Record Retention Policy. The timelines regarding record retention are set in line with all relevant legislation and guidelines. In relation to employment, these include the Department of Employment and Social Protection, Health Service Executive (HSE) and the Health and Safety Authority (HSA).

## **Section D: Information for work experience students and volunteers – including board members**

### **1. What type of information may we hold about you?**

- Curriculum Vitae
- Contact Details
- Next of kin details
- Garda Vetting
- Self-Declaration
- Nominated Supervisor
- Supervision notes
- Role Descriptor
- Start Dates
- Interview notes
- Training records
- Driving licence (and indemnity) if applicable
- Identification
- Signed code of behaviour/ethical conduct

### **2. When do we collect your information?**

We collect this information when you apply for a work experience placement or a volunteering role with WALK, and when you are on placement or engaged in volunteering with WALK.

### **3. Why do we need to collect this information?**

- To ascertain your suitability for a work placement or volunteering role.
- To provide you with information in relation to your work placement or volunteering role.
- To comply with our legal and contractual obligations.
- To respond to any emergencies, should they arise.

### **4. Who do we share your information with?**

- Third parties, where we need to share your information in order to determine your eligibility for a work placement or volunteering role.
- Statutory or regulatory bodies.
- Legal authorities, for example in the case of a disclosure order or other relevant regulations.
- The Health and Safety Authority in the event of an accident or incident at work.

### **5. Where do we store your data?**

Personal data on work experience students and volunteers shall normally be stored in the placement student or volunteers' file.

### **6. How long will we keep your information?**

WALK will only keep your personal data for as long as is necessary to fulfil the purpose it is being processed for. All personal data collected by WALK is kept in line with WALK's Record Retention Policy. The timelines regarding record retention are set in line with all relevant legislation and guidelines such as those of the Health Service Executive (HSE).



## **Section E: Information relating to WALK Suppliers**

### **1. What type of information may we hold about you?**

- Data to identify your company including name, address and other contact details.
- Information about you relating to your competency to take on specific work from regulatory or professional bodies.
- Financial information, such as bank account details, in order to process payments for work.
- Tender information and associated costings.

### **2. When do we collect your information?**

We collect this information when you provide quotes for work with WALK and when you engage in specific contracts with the organisation.

### **3. Why do we need to collect this information?**

- To ascertain your suitability to supply a service to WALK.
- When you have entered into a contract to provide a service to WALK.
- To effectively manage our services and provide you with information regarding your contract.
- To respond to any emergencies, should they arise.
- To comply with legal obligations.

### **4. Who do we share your information with?**

On occasion it may be necessary to share your information with:

- Any third parties whom we need to share your information with, in order to administer your contract.
- Statutory or regulatory bodies.
- Legal authorities, for example in the case of a disclosure order or other relevant regulations.
- The Health and Safety Authority in the event of an accident or incident at work.

### **5. Where do we store your data?**

Personal data on Suppliers is normally stored in electronic files on a sharepoint site.

### **6. How long will we keep your information?**

WALK will only keep your personal data for as long as is necessary to fulfil the purpose it is being processed for. All personal data collected by WALK is kept in line with WALK's Record Retention Policy. The timelines regarding record retention are set in line with all relevant legislation and guidelines these include the Department of Finance, The Department of Public Expenditure and Reform and the Health Service Executive (HSE).

**How your information is handled online: GDPR and cookie information:** WALK is committed to protecting your privacy and using technology that gives you the most powerful and safe online experience. This section of our privacy statement applies to WALK's website ([www.walk.ie](http://www.walk.ie)) and governs data collection and usage. By using WALK's website, you consent to the data practices described below.

Collection of your personal information: There is information about your computer hardware and software that is automatically collected by WALK. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used by WALK for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of WALK's website.

WALK encourages you to review the privacy statements of websites you choose to link to through WALK's website so that you can understand how those websites collect, use and share your information. WALK is not responsible for the privacy statements or other content on websites outside of WALK's website.

Use of your Personal Information: WALK collects and uses your personal information to operate WALK's website ([www.walk.ie](http://www.walk.ie)) and deliver the services you have requested.

WALK does not sell, rent or lease its customer lists to third parties.

WALK keep track of the websites and pages our customers visit within our website in order to determine what pages and information are most frequently viewed. These results are used to deliver content of most interest to website visitors.

WALK websites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on WALK or the site; (b) protect and defend the rights or property of WALK; and, (c) act under exigent circumstances to protect the personal safety of users of WALK, or the public.

Use of Cookies: Cookies are small digital signature files that are stored by your web browser that allow your preferences to be recorded when visiting the website. They may also be used to track your return visits to the website. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.

The WALK site uses "cookies" to help you personalize your online experience. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

Security of your Personal Information: WALK takes all reasonable steps to secure your personal information from unauthorised access, use or disclosure and secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure.

Removing or updating your information: If you wish to update or remove information previously provided to WALK or wish to no longer be contacted by WALK please contact us at [info@walk.ie](mailto:info@walk.ie) with details of your specific request or phone us on 00353 1 4650388 and your request will be actioned.

Emails to WALK: Any emails sent to us will be directed to the relevant recipient. The sender's email address will be visible to all staff who are tasked with dealing with the enquiry.

**Security of your personal data:** WALK are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Generally, the personal data that we collect from you will be processed in Ireland. However, it may be necessary in the course of business that WALK is required to transfer Personal Data to third party service providers in countries outside of the European Economic Area. When this is required, WALK will take steps to ensure that the data has the same level of protection as it does inside of the Republic of Ireland. The Organisation will only transfer the data to third parties that provides an adequate level of protection. Data that is transferred to a company in the United States which has signed up to the EU-US Privacy Shield is permissible.

**Your rights:** WALK actively supports the principle of fair and transparent processing of your personal information. We support your rights in relation to your personal information under the Data Protection Act 2018, including the:

- The right of access to your personal information: You can do this by making a subject access request (SAR).
- The right of rectification: You can request that we rectify any inaccurate or incomplete data that we hold about you.
- The right to be forgotten: In certain circumstances you can ask for the data WALK holds about you to be erased from our records, if there is no legitimate reason for the Organisation to keep it.
- The right to restriction of processing: In certain circumstances, you have the right to object to us processing personal data we hold about you.
- The right of portability: In certain circumstances you have the right to have the data WALK holds about you transferred to another organisation if it is in an electronic format.
- The right of review: In the event that WALK refuses your request under rights of access we will provide you with a reason why.
- The right to withdraw your consent: Where the processing of your personal data is based on your consent you have the right to withdraw your consent at any time.
- Right to Object to Automated Decision Making, including Profiling: Right to object to a decision made by automated processing, with certain limited exceptions (such as legitimate grounds for the processing or the defence of legal claims) and request that any decision made by automated processes have some human element.

If you wish to exercise any of these rights, please contact WALK's Data Protection Officer (DPO) in writing at: Data Protection Officer, WALK, 1 Longmile Road, Walkinstown, D12 FT73 or via email at: [DataProtection@walk.ie](mailto:DataProtection@walk.ie)

If you make a request, we have one month to respond to you. This period may be extended to up to 2 months where necessary, depending on the complexity of the request and the number of requests. The Data Protection Officer will write to the individual within 1 month of receiving the original request to tell him/her if this is the case.

In some cases, the Data Protection Officer may require proof of identification before the request can be processed. If this is the case the DPO will verify his/her identity and the documents required.

**Requesting access to your personal information:** You have a right to request access to the personal data that we hold about you.

If you have any questions in relation to your personal data or would like to request a copy of your personal data, please contact us at: [DataProtection@walk.ie](mailto:DataProtection@walk.ie)

**Making a complaint:**

If you wish to make a complaint regarding how your personal data has been processed, you have the right to lodge a complaint with the Data Protection Supervisory Authority. The website link is: [Raising a concern with the commission | Data Protection Commissioner](#) In order to make a complaint you need to click on 'Raise a Concern with the Data Protection Commission' and fill in the form.

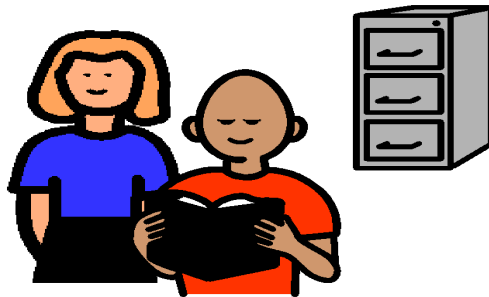
**Changes to this privacy statement:**

WALK may on occasion make changes to our privacy statement if there any changes in the way WALK operates or to comply with applicable laws or regulations. In the case of any changes being made to WALK's privacy statement we will notify our key stakeholder groups by posting a statement regarding the changes on our website.

## Appendix 1: Staff access to personal information



### Staff access to personal information






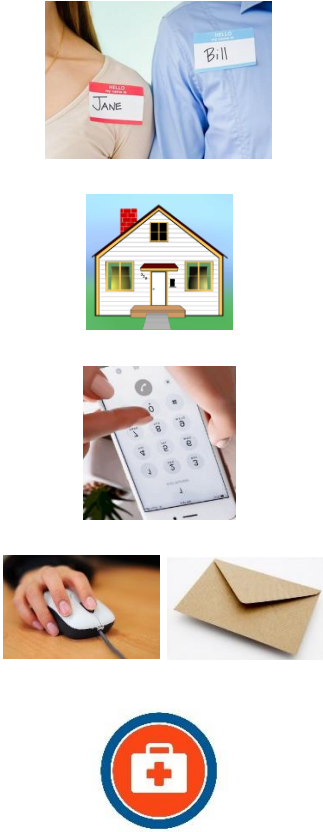

I am aware that all staff who support me have to have access to relevant information relating to me which allows them to support me properly.




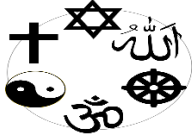












Anybody else who wishes to view this information must first come and ask my permission.





Signed	
Date:	

One copy of this form is kept in each location and is relevant for each file. It should be updated every three years.






**Appendix 2: A factsheet for individuals supported by WALK. How WALK uses your information:**

		<p>The way WALK use people's information is covered by law. This is called the General Data Protection Regulation (GDPR for short)</p>
		<p>GDPR is a set of rules and regulations about how organisations use your personal information and keep it safe.</p>
		<p>Personal information means any information that can be used to find out who you are and how to contact you.</p>
		<p>Examples of personal information we may hold about you are:</p> <ul style="list-style-type: none"> <li>- Your name</li> <li>- Your address</li> <li>- Your phone number</li> <li>- Your email address</li> <li>- Information about your health and healthcare</li> </ul>
		<p>WALK collects and keeps personal information about you to help us to provide a good service to you.</p> <p>It is WALK's responsibility to make sure that any information that we have about you is kept safe.</p>
		<p>This information may include:</p> <ul style="list-style-type: none"> <li>- Name</li> </ul>

         	<ul style="list-style-type: none"> <li>- Gender</li> <li>- Date of birth</li> <li>- Address</li>   <li>- Phone number/s</li> <li>- Email</li> <li>- Religion</li>   <li>- Medical history</li> <li>- Medical appointment details</li> <li>- Health Care plans</li>   <li>- Financial details (only when necessary)</li> <li>- Education or employment information</li> <li>- PPS number (only when necessary)</li> </ul>
	<p>Sometimes we may share your information with other people.</p> <p>This is to make sure that we can give you the best service</p>
    	<p>People who we may share your information with include:</p> <ul style="list-style-type: none"> <li>- The staff who support you</li>   <li>- Other people who support you, who you have said it is ok for us to share information with. This could include: Family members, employers, College or other groups or classes, work experience students or volunteers</li>   <li>- Healthcare professionals e.g. GP, dentist or hospital</li> </ul>

	<ul style="list-style-type: none"> <li>- WALK's funders e.g. the HSE</li> <li>- Other organisations, where required, e.g. Department of Social Protection, Local Housing Authority, Decision Support Service or the National Advocacy Service</li> </ul>
	<p>When WALK hold events we take photos and videos.</p> <p>The photos and videos we take can be used for:</p> <ul style="list-style-type: none"> <li>- WALK's website</li> <li>- On WALK's Social Media sites</li> </ul> <p>You can choose if you want to be in photos or videos.</p> <p>You have the right to change your mind and withdraw your consent.</p> <p>You can ask us to remove a picture or video at any time</p>
	<p>You have the right to:</p> <ul style="list-style-type: none"> <li>- Access the personal information that WALK has about you.</li> </ul> <p>We must get back to you within 30 days of you asking.</p> <p>If you ask for this information and we say no, we must tell you why.</p>
	<p>If we say no and you are not happy with this decision you can choose to make a complaint to WALK's Complaints Officer.</p> <p>The Complaints Officer in WALK is Wendy Farmer.</p>



   	<p>If you are still not happy with the decision you can contact the Data Protection Commissioner.</p> <p>They will check what information we have.</p> <p>They will ask why we said no.</p> <p>If they do not agree they will ask WALK to give you access to your information.</p>
	<p>You have the right to:</p> <ul style="list-style-type: none"> <li>- Ask WALK to correct any information that we have about you that is wrong.</li> </ul>
	<p>If you would like a full list of all your rights under GDPR you can talk to your keyworker.</p>
	<p>If you wish to exercise any of these rights or have any questions, you can contact WALK's Data Protection Officer:</p> <p>By email at: <a href="mailto:DataProtection@walk.ie">DataProtection@walk.ie</a></p> <p>By post at: Data Protection Officer, 1 Longmile Road, Walkinstown, Dublin 12</p>