



POSITIVE STEPS

SUPPORT | CHALLENGE | CHANGE

POSITIVE STEPS

Privacy Notice

2026

Who we are?

“We” and “us” means Positive Steps Oldham. We are a charity with registered charity no. 1017247 and a registered company with Company No. 2563094. We are a charitable trust that delivers a range of targeted and integrated services for young people, adults and families.

Your privacy matters

At Positive Steps, we are committed to keeping your personal data safe and secure. This notice sets out in detail the purposes for which we process information about you, who we share it with, what rights you have in relation to that information and everything else we think it's important for you to know.

If you have any questions about the processing of your personal information, or you would like to exercise any of your rights, please reach out to us with the details mentioned below:

Email us:

niyati@hope-may.com

Niyati Walia

Data Protection Officer

How we process your information:

To understand how we process your personal information and to understand your rights, please visit the relevant appendix below:

[Appendix 1: Clients](#)

[Appendix 2: Human Resources \(Job applicants, employees, volunteers\)](#)

[Appendix 3: Events, Donations, Fundraising and Marketing](#)

[Appendix 4: General Information \(Complaints Procedure, Your rights\)](#)

Changes to this Privacy Notice

We aim to keep this privacy notice regularly updated. This privacy notice is kept under regular review. If we make any significant changes to the way in which we process your information, we will let you know by either reaching out to you or posting a banner on the website.

This was last updated in January 2026.

Appendix 1: Clients

What and when do we collect information about you?

We collect personal data from individuals who access our services, including children, young people, and adults. This may include basic information such as names, addresses, dates of birth and contact details. For young people accessing careers support, we collect education-related data including school name, year group, and academic support plans. For those referred to our wellbeing and family support services, we may collect information on household members, risks and support needs. For the Bicycle Hire programme, we collect disability information which may be shared with third-party providers.

Data collected can vary slightly depending on the specific programme and referral pathway, including self-referrals or referrals from schools, authorities and councils. Depending on the service, we may also collect special category data such as health or mental health assessments, special educational needs (e.g. EHCP status), offending history (for Youth Justice clients), disability details, family circumstances, and safeguarding concerns. We may also collect special category information such as race, ethnicity and health data along with survey information and photographs.

How and why is the information processed?

We collect personal data to deliver a range of support services on behalf of local authorities and other public bodies, including statutory services such as Youth Justice and Careers Guidance. For preventative and early intervention services such as Family Support, Young Carers respite and Wellbeing services, we use the data to assess needs, plan personalised support and monitor progress. In education-focused services, data helps us track young people's progress and ensure they receive appropriate advice or interventions. Data collected through referrals also enables us to safeguard vulnerable individuals, coordinate

with partner agencies, and deliver effective, targeted services. We may also use this information for surveys and conducting research.

What is our lawful basis for processing this information?

- For delivering statutory services like Youth Justice, we rely on legal obligation.
- For providing education, careers guidance, and family support, our lawful basis is public task.
- For using photos and surveys, we rely on your consent.
- For activities that support service delivery without overriding individual rights, our basis is legitimate interests.
-
- For processing special category data like health information, ethnicity, racial or ethnic origin,
- , our basis is UK GDPR- **Article 9(a)** explicit consent or **Article 9(2)(g)** (substantial public interest), read with Data Protection Act 2018, Schedule 1 Part 2- condition 17- counselling.
- Criminal offence data is processed in accordance with Article 10 UK GDPR and the Data Protection Act 2018. Processing is supported by an Article 6 lawful basis (legitimate interests and the relevant Data Protection Act 2018 - Schedule 1 Part 2 condition 18 : safeguarding of children and individuals at risk.

Who do we share your data with?

1. We rely on public task to share your data with local authorities and legitimate interest to share it with Big Life. We may also need to share data back with the school for pupils, so schools are enabled to undertake their duties to track the progress and destinations of their pupils as required by Department for Education, for which the lawful basis is legal obligation. Each organisation acts as an individual data controller of your personal information.
2. Personal data is not shared with funders. Information shared with funders is shared only anonymously.
3. To comply with our duty of care and safeguarding, we may need to pass some information raising safeguarding concern with the authorities. In such circumstances, we apply vital interest and legitimate interest as our lawful basis. Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed in these circumstances. Exceptions and exemptions are applied on a case-by-case basis.

How we store your information and for how long?

We retain the personal data of all service users for a period of in line with our retention periods. If you would like to know more about this, please contact us at the email address above.

Appendix 2: Human Resources

(Job applicants and current and former employees, trustees, volunteers)

How and when do we collect information about you?

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your employment/engagement. In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references.

What types of information is collected about you and who provides it?

We keep several categories of personal data to carry out effective and efficient processes. Specifically, depending on your type of engagement with us, we may process the following types of data:

1. Personal details such as name, address, phone numbers, marital status
2. Name and contact details of your next of kin
3. Footage of the organisation events where you may appear
4. Information of any disability or other medical information you have disclosed
5. Right to work documentation, National Insurance number, bank account details
6. Information gathered via the recruitment process such as that included in a CV, cover letter or application form, references, details on your education and employment history etc
7. Information relating to your employment with us (e.g. job title, job description, salary, terms and condition of the contract, annual leave records, appraisal and performance indication, formal and informal proceedings involving you such as letters of concern and disciplinary, disciplinary and grievance proceedings)
8. Your biography and picture for the website (if applicable).

We may also process special category of data which include health information, sexual orientation, race, ethnic origin. We may also process criminal records information if the role involves DBS check.

How is the information used?

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment or your volunteer/ trustee agreement, without which we would be unable to employ you or engage with you. Holding your personal data enables us to meet various administrative tasks, legal obligation or contractual/agreement obligation. We process information in relation to the DBS for our safe recruitment practices.

What is our lawful basis for processing this information?

We mainly use 'contractual obligation' as a lawful basis for processing personal data for employees, job applicants and freelancers. We mainly use 'legitimate interest' for trustees and volunteers. We may also have legal obligation in order to process and share your data, for example we need to share salary information to HRMC or use some of your data to enrol a new employee on a pension scheme

We may rely on our legitimate interest for processing activity such as keeping supervision and appraisal records; using your image, bio and videos/pictures of the organisations' events where you may appear on our website or marketing/fundraising materials to promote the charity.

Some special categories of personal data, such as information about health or medical conditions is processed in order to carry out employment law obligations and for health and social care obligations (such as those in relation to colleagues with disabilities and for health and safety purposes). We may also process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief on the basis of substantial public interest for the purposes of equal opportunities monitoring.

When processing criminal records (for example, in order to perform DBS check), the organisation relies on the lawful basis of legitimate interest and additional conditions of the UK GDPR and DPA 2018.

Who do we share your data with?

Personal Data in relation to your salary is shared with HRMC as part of our legal obligation.

Personal Data may be shared with third parties for the following reasons:

1. for the administration of payroll, pension, HR functions or administering other employee benefits.
2. When sharing information with third parties, we have data sharing agreements, data processing agreements or contracts in place to ensure data is not compromised. These third parties implement appropriate technical and organisational measures to ensure the security of your data.

How long do we keep your data?

We only keep your data for as long as we need it for, which will be at least for the duration of your employment/engagement with us though in some cases, we will keep your data for a period of 6 years after your employment/engagement has ended. If you've applied for a vacancy but your application hasn't been successful, we will keep your data only for 12 months.

Some data retention periods are set by the law. Retention periods can vary depending on why we need your data. Please get in touch by contacting us using the details above if you want to know more about retention period.

Data is destroyed or deleted in a secure manner as soon as the retention date has passed.

Appendix 3: Marketing and Fundraising

Events:

We host many events in a year, and your personal information is collected when you register for an event with us. We may collect basic personal information, such as your name, email, phone number. We rely on legitimate interest to administer your registration for the event. When we collect other information such as dietary information, we rely on your explicit consent.

If you have attended an event with us previously, we may reach out to you to invite you for our future events. We rely on consent (to send you emails) and legitimate interest (to call you on your registered number with us).

Donations:

Your personal information is provided by you via a donation form on our website. The information gathered may be name, email address, Gift Aid sign up and donation details.

This information allows us to process your donation, and deal with any potential enquiry. We rely on our legitimate interest to process this data. If you agree that we can claim Gift Aid on your donations we are legally required to keep a record of the claim and your Gift Aid declaration. If you are donating using a third party, please also refer to the privacy notice published on their websites.

Fundraising and Marketing:

We may reach out to you for fundraising, if you have previously engaged with us in an event, made a donation, or if we believe that you may be interested in engaging with our organisation. We may also send you marketing communications if you have signed up for marketing emails. We use texts, email, and calls for marketing.

When we make calls for fundraising and marketing, we make these calls on the lawful basis of legitimate interest. However, we will screen your calls through the telephone preference service (TPS). If you would prefer to not receive these calls, please do let us know.

We rely your consent to send your email communications (except where this is a business email address, whereby we rely on legitimate interest).

If you would like to change your marketing preferences, please reach out to us on the email address provided in the first section of this privacy notice, or you can simply unsubscribe with the option on the bottom of the emails.

We may also use post as a mode of sending you marketing communications, relying on legitimate interest. If you would like us to not send such communications, please do reach out to us.

Appendix 4: General Information

(Complaints Procedure, Your rights)

Your rights as a Data Subject

You have the following rights:



- **'Right to be informed'**, which means we will be completely clear and transparent about how we plan to use your personal information.
- **'Right of access'**, which means you can request details of the personal information we hold about you and how we use it. We will provide this within one month.
- **'Right to rectification'**, which means you can ask us to update or amend the personal information we hold about you, if it is incorrect.
- **'Right to restrict processing'**, which means you can ask us to change, restrict or stop the way we are using your personal information.
- **'Right to erasure'** (or 'right to be forgotten'), which means you can ask us to remove your personal information from our records.
- **'Right to object'**, which means you can object to us using your personal information for marketing purposes.
- **'Right to data portability'**, which means you can obtain the personal information we hold about you and reuse it for your own purposes.
- **'Right not to be subject to automated decision making'**, which means if we use systems to make a decision about you, you have the right to ask for a person to intervene, which may change the outcome.
- **Right to lodge a complaint** with a supervisory authority, such as the Fundraising Regulator or the Information Commissioner's Office (ICO), if you are not satisfied with our response to a request you make to us, or you feel we are not using your information correctly.

International Data Transfers

Where personal data is stored outside of the UK and the EEA, safeguards to protect personal data may include but are not limited to the UK Addendum used in conjunction with the EU Standard Contractual Clauses (SCCs), or UK International Data Transfer Agreement (IDTAs). Such safeguards will be subject to Transfer Risk Assessments (TRAs).

Complaints procedure

If you are unhappy with the way we process your data, please get in touch with the Data Protection Lead using the contact details mentioned above.

You can also make a complaint to the Information Commissioner's Office (ICO), which regulates the use of information in the UK. They can be contacted at 0303 123 1113 or, you can write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.