

Privacy Notice – BSO Leadership Centre

1. Introduction

The Business Services Organisation (BSO) has been established to provide a broad range of regional business support functions and specialist professional services to the health and social care sector in Northern Ireland. More detailed information about different aspects of our work can be found on our website. <http://www.hscbusiness.hscni.net/>

BSO recognises the importance of protecting personal and confidential information in all that we do, all we direct or commission, and takes care to meet its legal duties. Key legislation includes:

- the General Data Protection Regulation 2016 (GDPR),
- the Access to Health Records (Northern Ireland) Order 1993 (AHR)
- the Freedom of Information Act (2000) (FOI),
- the Environmental Information Regulations (2004) (EIR),
- the Human Rights Act 1998 (HRA),
- relevant health service legislation, and the
- common law duty of confidentiality

The Leadership Centre is a unit within the Business Services Organisation (BSO). BSO's full Privacy Notice can be found here: <http://www.hscbusiness.hscni.net>

2. Your Information

The Leadership Centre uses personal information for a number of purposes. This Privacy Notice provides a summary of how we use your information. To ensure that we process your personal data fairly and lawfully we are required to inform you of:

- What personal information we collect
- Why we need your data
- How it will be used
- Who it will be shared with
- How long it will be kept for

2.1 What types of personal data do we handle?

The Leadership Centre process personal information in relation to the Regional Learning Portal on behalf of HSC organisations. This information includes:

- Names, telephone numbers and email addresses
- Employment details – staff number and Directorate/Team
- Course progress information (e.g. which elements of a programme have been completed and results of assessments)

The responsibility for ensuring the accuracy of personal data for HSC staff lies with the eLearning administrators within the organisation.

2.2 Why we need your data

When you register on the Regional Learning Portal , HSC will use your details to:

- deliver training to you;
- contact you with regard to any matter relating to your online learning;
- to issue completion/progress reports to our hosted organisations.
- from time to time an employer may request details of course completion / progress by their staff.
- the Leadership Centre also use course information and online evaluation information (which may include your personal data) for quality assurance and management information purposes. This information is shared within HSC and with those parties who provide education on our behalf.
- the Leadership Centre also provides access to nominated individuals within each of the hosted organisations for user and course management. These individuals can only access user information for staff within their own organisation / area of responsibility.

Information processed for the above purposes is therefore lawful under Article 6 of GDPR:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- processing is necessary for compliance with a legal obligation
- processing is necessary for the performance of a task carried out in the public interest
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

2.3 How will we use information about you?

The Leadership Centre will use the above information to monitor/analyse trends and for the purpose of organisational learning and providing an efficient service and provide access to host organisations to allow them to do the same if they wish.

On occasions we may contact everyone who has a profile on the Regional Learning Portal. This will be to inform you of changes being made to the website. If you do not want to receive these emails please inform the Leadership Centre at the following email address: enquiries@leadership.hscni.net.

2.4 Sharing your information

In addition to the above, BSO/Leadership Centre may also be obliged to provide personal information to another statutory organisation (such as a Police Force, Health Regulator or Investigatory Body), or via a Court Order. Information processed for this purpose is therefore lawful under Articles 6(1)(c), 6(1)(d) and 6(1)(e) of GDPR:

- 6(1)(c) – Processing is necessary for compliance with a legal obligation
- 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person
- 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

BSO will not sell, assign, disclose or rent your personal data to any other external organisation or individual.

2.5 Retaining Information

The Leadership Centre will only retain information for as long as necessary, in line with the Department of Health (DoH) Good Management, Good Records (GMGR). For further information, please refer to the following DoH link: <https://www.health-ni.gov.uk/topics/good-management-good-records>

2.6 Right to be forgotten

Individuals have certain rights under GDPR, namely:

- The right to obtain confirmation that their personal information is being [processed, and access to personal information](#)
- The right to have personal information [rectified if it is inaccurate or incomplete](#)
- The right to have personal information erased and to prevent processing, [in specific circumstances](#)
- The right to 'block' or suppress processing of personal information, [in specific circumstances](#)
- The right to portability, [in specific circumstances](#)

- The right to object to the processing, [in specific circumstances](#)
- The rights in relation to [automated decision making and profiling](#)

Please click on the above links or refer to BSO's Privacy Notice for further information.

3. Security of your information

BSO is committed to taking all reasonable measures to ensure the security of all personal information it holds. The following arrangements are in place:

- a. All BSO staff have contractual obligations of confidentiality, enforceable through disciplinary procedures;
- b. Everyone working for the HSC is subject to the common law duty of confidentiality;
- c. Staff are granted access to personal data on a need-to-know basis only;
- d. BSO has appointed a Senior Information Risk Owner (SIRO) who is accountable for the management of all information assets and any associated risks and incidents, and a Personal Data Guardian (PDG) who is responsible for the management of employee and any patient information/confidentiality. Deputy SIROs have also been appointed in directorates and local Information Asset officers (IAOs) have been appointed as part of its Information Governance arrangements. BSO has also appointed a Data Protection Officer (DPO);
- e. All staff are required to undertake information governance training every 2 years. The training provided ensures that staff are aware of their information governance responsibilities and follow best practice guidelines to ensure the necessary safeguards and appropriate use of personal information;
- f. A range of policies and procedures are in place
- g. The Leadership Centre have in place a number of technical, physical and managerial procedures to safeguard and secure the information we collect.

4. Receiving Information

4.1 How can you access your personal information?

GDPR gives you the right to access information that BSO holds about you. Subject Access Requests must be made in writing. You will need to provide:

- adequate information (for example full name, address, date of birth) so that your identity can be verified and your information located

- an indication of what information you are requesting to enable us to locate this in an efficient manner

BSO aims to comply with requests for access to personal data as quickly as possible, and normally within a calendar month of receipt unless there is a reason for delay that is justifiable under GDPR.

We want to make sure that your personal information is accurate and up to date. If you think any information is inaccurate or incorrect then please contact your organisation administrator. A list of these can be found on the Regional Learning Portal.

4.2 Freedom of Information

The Freedom of Information Act 2000 provides any person with the right to obtain information held by BSO, subject to a number of exemptions.

4.3 Complaints about how we process your personal information

If you are dissatisfied with how BSO is, or has been, processing your personal information, you have the right to advise BSO of this in writing.

5. Contact Details

Any request for information, or complaints, should be submitted in writing. Contact details are as follows:

- Subject Access Requests: dpa.bso@hscni.net
- Freedom of Information Requests: foi.bso@hscni.net
- Complaints: complaints.bso@hscni.net

You may also submit requests or complaints to:

Corporate Services
6th Floor
2 Franklin Street
Belfast
BT2 8DQ

You may also contact the Data Protection Officer for the BSO directly:

- Email: dpo.bso@hscni.net
- Tel: 02895 363666

6. Changes to our Privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on this document.