

## Children's Law Centre Privacy Policy

The UK General Data Protection Regulation 2021 and Data Protection Act 2018 seeks to protect and enhance the rights of individuals relating to the handling of their personal data. Children's Law Centre is committed to protecting and respecting your personal data.

We may change this Privacy Policy at any time by updating this page so you should therefore check our website at [www.childrenslawcentre.org](http://www.childrenslawcentre.org) from time to time to ensure you are aware of any changes. Please keep us informed if your personal information changes during your relationship with us.

**Who we are** – Children's Law Centre is registered with the Information Commissioner's Office (ICO). Our Data Protection Officer (DPO) Trevor Wright can be contacted at our registered address: Rights House, 127 – 131 Ormeau Road, Belfast, BT7 1SH. T: 02890245704. E: [reception@childrenslawcentre.org](mailto:reception@childrenslawcentre.org)

### Purpose for processing personal data

Founded upon the principles laid down in the United Nations Convention on the Rights of the Child, the Children's Law Centre (CLC) was established in 1997 to vindicate children's rights including through the provision of free strategic legal advice and representation for children and young people. We are a specialist children's human rights centre, an independent charitable organisation which works towards a society where all children can participate, are valued, have their rights respected and guaranteed without discrimination and where every child can achieve their full potential.

To carry out this work it is necessary for us to record and process personal details provided by clients seeking advice, advocacy and/or legal representation. Other data that we process includes that for employees, recruitment, volunteers, funders, members, participants in training and engagement, stakeholder organisations, suppliers and tenants, which is done in the course of running the charity.

CLC holds data about the following types of data subjects:

Data Subjects	Description
<b>Client contacts (Child or young person)</b>	Any child or young person who has engaged CLC to provide legal advice, information or representation services to them where personal details have been provided.
<b>Client contacts (adults on behalf of children)</b>	Any adult who has engaged CLC to provide legal advice, information or representation services on behalf of a child where personal details (including those of children) have been provided.
<b>CLC Members</b>	Any individual who has registered to be a member of CLC either personally or representing an organisation.
<b>Stakeholders and Service-user organisations</b>	People from statutory bodies and organisations, voluntary and community-based organisations including children and young people's sector, advice sector, and other representative bodies.
<b>Professionals</b>	Any professional who works with children and young people who has contacted us, made a referral, engaged our services or otherwise supported us, including legal professionals
<b>Networking Contacts</b>	People who support our work, have attended training or events organised by CLC, signed up for our 'Child Rights Matter' ezine or signposted others to our services.

<b>CLC staff and volunteers</b>	People who are or have been employed by CLC, people who are or have been Trustees, and people who are or have volunteered with CLC including Youth@CLC members.
<b>Donations, fundraising and sponsorship</b>	People who donate, raise funds for CLC or support its work through sponsorship or 'in kind' support.
<b>Suppliers and Tenants</b>	Individuals and organisations CLC exchanges goods and services with.

## **The types of personal information we collect**

CLC collects personal information as a service provider, an employer, a charity, and a business and collects a variety of personal information in the course of its work and operations. The following table provides a detailed summary of the types of personal data we hold to provide our services and is not an exhaustive list of all of the data we retain:

This includes

- Information from people seeking advice, advocacy and/or representation on behalf of their child(ren), or from children themselves.
- People who are employed by CLC and those who have made applications for employment.
- People volunteering with Children's Law Centre including members of Youth@CLC, Trustees, general volunteers and young people undertaking placements.
- Members, associate members and young members of the organisation.
- People who have donated money or fundraised on behalf of CLC.
- People from other organisations that CLC works with and engages with.
- Suppliers of services to CLC and other stakeholders.

## **Lawful Bases for Processing Personal Information**

We rely on one or more of the following lawful bases for processing personal data:

- consent;
- legitimate interests in the effective delivery of services;
- legal obligation;
- contract.

We currently collect and process the following information:

### **Personal data we may collect from people seeking our advice and legal services**

- Full Name
- Date of birth
- Address and postcode
- Telephone, mobile, email and other contact details
- National Insurance Number
- Financial information, including bank details
- Information relating to your special educational needs, medical conditions and/or disability
- Interview notes and statements relating to your case
- Documents received from you relating to advice and/or casework
- Client testimonials and feedback relating to services provided

## **Personal data we may collect from other sources**

- Medical notes and records
- Health & Social care professional records
- Education records (e.g. from schools, Education Authority and Department of Education)
- Third party correspondence relating to you
- Statements/ reports from third parties relating to your case
- Independent reports
- Records of legal information and advice provided to you by CLC and others
- Case files detailing legal representation services provided to you
- Court and Tribunal Orders
- Criminal records and convictions
- Information from the Home Office regarding your immigration case/ asylum claim

## **Personal data we may collect for recruitment or volunteering purposes**

- Full Name
- Date of birth
- Address and postcode
- Telephone, mobile, email and other contact details
- National Insurance Number
- Financial information, including bank details
- Special categories\* of personal information that are used for equality monitoring purposes and for criminal record checks.

*\*Special categories of personal data include details about a person's race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data. We collect these types of data only where it is necessary and in line with specific conditions under the GDPR and the UK Data Protection Act 2018 (DPA). This also includes personal data about criminal convictions and offences.*

## **Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties. This will normally be in processing your case. For example, where it is necessary for providing you with legal services, we may share your data with officers of the Court or Tribunal, other parties to proceedings and their legal representatives; experts; health care professionals; education professionals; schools, Health and Social Care Trusts, the Education Authority, Legal Services Agency (where you are applying for Legal Aid); our legal costs drawer; the Home Office (in asylum / immigration matters only).

Sharing of personal information with third parties will normally be done with your consent, unless CLC is otherwise required to do so (i.e. for legal reasons or in the public interest). Your data will only be shared where there is a lawful basis to do so.

We also outsource some of our functions, including IT support and external data storage, Access NI checks, legal standards auditors, funding and accountancy auditors. Where we engage with other organisations, we will always ensure that:

- We only provide the information they need to perform their specific services;
- They only use your data for the exact purposes we specify;
- We ensure your privacy is respected and protected at all times.

## **Legal Service Standard's Audits**

As part of our legal services quality control checks CLC has an annual Lexcel quality audit by an external assessor whose company is recognised by the Law Society for Northern Ireland. As part of this annual audit process the assessor is given access to a small number of client case files for the purposes of assessing the quality of our legal service provision. Annual audits are conducted in confidence and the assessor is bound by a confidentiality clause within the assessment contract.

If you or your child's file is selected prior to the assessment date for auditing purposes we will seek your consent for inspection by the external assessor.

## **Receiving data transfers from the EEA**

On 28 June 2021, the EU Commission published two adequacy decisions in respect of the UK:

- one for transfers under the EU GDPR; and
- the other for transfers under the Law Enforcement Directive

The EU GDPR adequacy decision does not cover personal data transferred from the EEA for the purposes of UK immigration control, or data which would otherwise fall under the scope of the immigration exemption in DPA 2018. EEA organisations can still make these transfers using an appropriate safeguard from the EU GDPR.

Usually, the simplest way to provide an appropriate safeguard for a restricted transfer from the EEA to the UK is to enter into standard contractual clauses with the sender of the personal data.

CLC will undertake to follow the correct protocols and apply the appropriate safeguards if working on immigration cases that require data transfer from the EEA for the purposes of UK immigration control.

## **Where is your data processed?**

We will usually only process your data within the European Economic Area (EEA). If we have to share your personal data with third parties outside the European Economic Area (EEA) we will ensure that appropriate safeguards are in place.

## **For how long will we keep your data?**

CLC information and records retention policy outlines how long we will keep records as follows:

Organisational funding and financial transactions	7 years
---	---------

Legal advice notes and legal files	6 years after the advice or case has concluded
Legal case files	End of year in which client turns 21 years old
Immigration files	5 years after asylum has been granted or not
Recruitment records	1 year after recruitment date
Fair Employment Monitoring	3 years
Employee records	6 years after employment has ended
Volunteer records	3 years after volunteering has ended
Marketing records (contact names/emails)	5 years
Aggregated data which has been anonymised	No limit

## How we protect your data

Personal data of those seeking advice and support through CLC's legal advice service is recorded in a secure case management system, ALB. This system is password protected and accessed by our advice and legal services team. We also hold personal data relating to clients for whom we are providing legal representation in hard copy legal case files. These files are stored securely in locked filing cabinets in a secure area with limited access by designated legal staff. Closed legal case files are retained securely until the child subject's 21<sup>st</sup> birthday before being securely destroyed.

Data collected from REE is stored in a secure encrypted site within Wordpress. This data is mainly anonymised unless a client has requested a live chat when they must leave their name and contact details. Staff personnel files, recruitment records, volunteer details, suppliers, CLC members and Youth@clc membership information are retained in both soft and hard copy. All information is securely stored either in secure cabinets with access by designated members of staff and on our secure computer system.

The General Data Protection Regulations (GDPR) implemented in May 2018 was a set of European Union regulations that applied to all member states. The United Kingdom voted to leave the European Union and as part of the process developed the Data Protection Act of 2018 which incorporated all requirements of the EU GDPR. This was further supplemented when the UK left the EU on 30<sup>th</sup> January 2021 by the UK GDPR which sits alongside the Data Protection Act 2018.

This Privacy Notice provides an overview of our approaches and procedures to protect your personal information, and links to a number of other documents and procedures that support the management of personal information in CLC including:

- Data Protection Policy
- Data Protection Impact Assessments (DPIA)
- Information Management and Acceptable Use Policy
- Confidentiality Policy

- Staff training - CLC Staff receive training on all policies as part of induction and refresher training bi-annually thereafter.
- ICT Systems - Access to information stored on our ICT systems is password protected requiring two-factor authentication. Computers are part of a secure network and data is backed up on a daily basis. Leaf-IT provide IT support for CLC and manage:
  - Anti-virus software
  - Email filtering and spam protection
  - Internet firewall protection
  - Patch management
  - Encryption software
  - Backup recovery and replication software
  - Cloud storage

Where you access our services to attend training or events we use the Ticket Tailor ticketing platform to book training and other events. The Ticket Tailor Privacy Policy can be viewed here: [GDPR | Ticket Tailor](#). We use the mailchimp email and marketing platform through which you may subscribe to receive the e-zine. You can view the mailchimp Privacy Policy here: [Global Privacy Statement | Intuit](#). We use a Wordpress plug-in called Paid Membership Pro that enables people to become a CLC member. Further details of their Privacy Policy can be viewed here: [Paid Memberships Pro Privacy Policy](#). This is supported by Stripe payments system and their Privacy Policy can be viewed here: [Privacy Policy](#).

### **What are your rights in relation to your personal data?**

The UK General Data Protection Regulation 2018 and Data Protection Act 2018 provides you with the following rights in respect of your personal data:

Under data protection law, you have rights including:

- (a) Your right of access** - You have the right to ask us for copies of your personal information.
- (b) Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- (c) Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- (d) Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- (e) Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- (f) Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

### **Your right to withdraw consent for processing of your personal data**

Where you have given us your consent to process your data or disclose to a third party, you have the right to change your mind at any time and to withdraw your consent. If you decide to withdraw your consent you must notify us immediately in writing.

## **How can you access the personal data we hold?**

You have the right to access your personal data held by CLC. To do this you must make a Subject Access Request advising of what data you want to see and how you would like to receive it (either hard or soft copy). When you contact us you will need to identify yourself and provide proof of identity. Requests will normally be dealt with within one month of the date of receipt of the request and we will provide you with copies of the information we hold on you. If we are unable to provide the information to you within one month, we will contact you to advise when we will be able to provide it. In some cases, we may not action your request but we will explain to you the reasons why.

For more information on your rights please contact the Information Commissioner's Office website at:

[Getting copies of your information \(SAR\) | ICO](#)

## **Contacting Children's Law Centre**

If you have any questions relating to this Privacy Notice or wish to seek confirmation about the personal data which CLC holds about, you may contact our Data Protection Officer. They can be contacted at

Children's Law Centre  
Rights House  
127 – 131 Ormeau Road  
Belfast  
BT7 1SH  
Tel: 028 9024 5704  
E: [reception@childrenslawcentre.org](mailto:reception@childrenslawcentre.org)

## **How do I make a complaint if I am unhappy with your response?**

If you believe your personal data has not been handled appropriately by CLC you can lodge a complaint with our Data Protection Officer and we will do everything to address and rectify the issue for you.

If you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you may wish to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling **0303 123 1113**

You may also register a complaint online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

Please note we are not responsible for the content of external websites or any external complaints process.

## **Notification of change of Privacy Policy**

This Privacy Policy may change from time to time. For example, if there are new legal requirements. Please visit this website section periodically in order to keep up to date with the changes in our Privacy Policy. We will notify you about significant changes by posting on our website. This Privacy Policy was last updated May 2025.