



Tanyard Youth Project Ltd

Privacy Notice

New Privacy Notice created May 2018 in preparation for GDPR

Reviewed and Approved by the Board of Trustees: May 2018

We are committed to reviewing our policy and good practice regularly.

This policy will be reviewed once every 18 months

This policy was last reviewed on 18th February 2021

Signed and Dated:

Val Brown 25/3/21 (Chair of Trustees)

Jennifer M. Whyte (Trustee)
25/3/2021

Our Privacy Notice

1. Introduction

This privacy notice explains how the Tanyard Youth Project handles personal information. Tanyard Youth Project Ltd is a company limited by guarantee, registered in England and Wales under company number 05336853 and charity number 1108844. Details on how to contact us are in Section 10 below.

The Tanyard Youth Project is committed to protecting your personal information and being transparent about what information we hold, whether you are a young person, donor, volunteer, trustee, employee or you connect to us in another way.

The purpose of this Privacy Notice is to give you a clear explanation about how the Tanyard Youth Project collects and uses the personal information you provide to us, whether online, via phone, email, in letters, in any other correspondence or from third parties.

We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What personal information the Tanyard Youth Project may collect about you
- How we might use that information
- Our legal basis for contacting you and using your personal information
- How we protect the privacy of children and vulnerable people
- Whether we disclose your details to anyone else
- Your rights and choices regarding personal information you provide to us

2. When do we collect personal information?

We may collect personal information about you when you:

- Sign up for our activities, resources, trips or training
- Request information from us
- Use our services or attend our activities, Youth Drop In or other projects
- Sign up for publications or newsletters we might issue
- Become a Trustee or an employee
- Volunteer or fundraise for us
- Make a donation
- Purchase services from us or hire our premises or facilities

- Telephone, write, contact us online, text us, or otherwise provide us with your personal information.

We may collect information about you directly whenever you interact with us. We may also receive information about you when you interact with third parties with whom we work. For example, where you've made a donation to us through our website, which is operated by a third-party (e.g. GoFundMe) you may have given them permission to share your information with us.

We may supplement what we know about you with information that is available to the public. For example, we may need to identify your post code for our records.

3. Why do we collect this information?

The main purposes for which we use personal information are:

- To enable us to carry out the work of the Tanyard Youth Project as specified in our Memorandum and Articles (also known as our governing document or constitution).
- To support young people and be able to respond appropriately in an emergency.
- To track and analyse attendance statistics.
- To monitor young people's progress and achievements.
- To record any concerns we may have resulting from an activity, workshop, trip or other session.
- To promote the Tanyard Youth Project and undertake fund-raising activities.
- To create materials for stakeholders (such as trustees, donors and partner agencies) about the Tanyard Youth Project's activities.
- For legal and regulatory compliance purposes, for example, to ensure compliance with safeguarding, health and safety requirements and other legal obligations, or in connection with litigation, an internal investigation or audit, and to ensure compliance with laws, as well as equal opportunities monitoring.
- To manage our employees and volunteers.
- To maintain our own accounts and records.
- To inform individuals of news, events, activities or services running at the Tanyard Youth Project and partner organisations.
- For administrative purposes (for example, we may contact you regarding a trip for which you have registered, to provide you with information you have requested from us or with a query regarding a donation you may have made to us).
- To carry out any contractual obligations we may have to you such as providing facilities or services.
- To process donations we may receive from you.

- For internal record keeping relating to any donations, feedback, or complaints.
- To contact you where you have been identified as a contact person for an organisation with whom we do or may work (if we obtain your contact details in this way, we will only use them to contact you in your capacity as a representative of that organisation).
- For our 'legitimate business interest', which means reasonable use in line with the aims and activities of the Tanyard Youth Project.

Wherever possible for reporting purposes, we 'anonymise' personal information, so that individuals can not be identified.

4. What information do we collect?

Personal information we collect can include information such as your name, email address, postal address, telephone number, mobile number, date of birth, communication preferences and, where relevant, bank account details so we can process payments and information for the purposes of paying staff or reimbursing expenses.

We may also collect and record any other relevant information you share with us about yourself, for example your other employer(s) or your school, college or other training provider.

We may also collect and process information about your interactions with us, including details about our contacts with you for example through email, on the phone or in person (such as the date, time, and method of contact), details about events or activities that you register for or attend, and any support we may have provided.

Under data protection law, certain categories of personal information are recognised as sensitive, including information regarding race, religious beliefs sexuality, gender, health information, whether you are looked after through the local authority ('in care'), or other characteristics relevant to the purpose for which we hold your data e.g. safeguarding.

In limited cases, we may collect sensitive personal data. We would only collect sensitive personal data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or support to enable you to participate in an event or group.

With your consent, we might also gather from you and hold case studies or stories of you and your activities with us, e.g. through photographs, films and videos for social media or through written, anonymised, case studies. This is usually for reporting to funders or for promotional purposes.

We will only collect sensitive personal data with your consent, and clear notices will be provided on applications for trips and events and other relevant forms and communications, so you know what information we need and why we need it.

In some cases, such as for potential grant-making organisations, we may also collect information from publicly available sources such as Companies House or the Charities Commission.

We keep your personal information only for as long as required to carry out the functions of the Tanyard Youth Project in accordance with legal requirements, as well as tax and accounting rules. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

5. When do we collect personal information?

Generally, our processing of your personal information as described in this policy is allowed by applicable data privacy laws because we have a legitimate need to carry out the processing for the purposes described above. Some processing may also be necessary so that we can perform a contract with you (e.g. if you commission us to provide a service or hire our facilities) or because it is required by law. We only use your information to contact you with your consent, and you can always opt out as explained below.

When you give us personal information using our forms (e.g. a membership form, trip consent form) or in person, then you are giving us your consent to contact you by the methods you have chosen, (e.g. email or phone call). We will never send you email without your consent, and you can withdraw your consent at any time.

When contacting those who fund our projects or commission our services we will not provide any of your personal information to them without your explicit consent.

If you have provided us with your postal or telephone contact details, but haven't specifically opted-in to receive communication from us, then we will carry out an assessment of whether it would be fair and reasonable to use them to contact you without your explicit consent, (i.e. it is in the interests of our aims as a charity and will not cause undue prejudice to you). For example, if we have a concern that is significant and we think you should know about it, we may decide to contact you. This is called a "legitimate interests assessment".

In all cases, we balance our legitimate interests against your rights as an individual, and make sure we only use personal information in a way or for a purpose that you would

reasonably expect in accordance with this Policy, and that does not intrude on your privacy or previously expressed communication preferences.

If certain levels of donation are made, the Fundraising Regulator's Code of Fundraising Practice requires us, and all charities in the UK, to perform checks. If such donations are made to us, then we will seek advice from the Fundraising Regulator or a specialist third party. More details on this can be found at www.fundraisingregulator.org.uk.

You can opt out of being contacted by us at any time by sending an email to tanyardyp@hotmail.com.

6. Children and Vulnerable People

We place great importance on the safety of children and young people we work and interact with and we are committed to protecting the privacy of all young people who interact with the Tanyard Youth Project.

For more information about the ways we safeguard young people, you can request a copy of our Safeguarding Policy by emailing tanyardyp@hotmail.com.

Our activities and events may request specific information about the age of participants. We will always seek consent from a parent, guardian or carer before collecting personal information about young people under 18.

We will always put information in plain English in documents for children and young people, and wherever we have face-to-face interactions with young people and children, we will encourage them to think about their rights, and the consequences of sharing their data.

7. How we might use your information

Developing a better understanding of our members through their personal data allows us to support them better. It also allows us to raise funds more effectively, which ultimately helps us to support more children and young people in the future.

We may use your information to invite you to become involved with us in new activities, help us to raise funds and grow our membership. Materials that we might share with you include information about our activities and their impact, our news, events and fundraising appeals, and other ways you can become involved with us.

We have a duty to make sure that we're spending grants and donations wisely, and that means doing some research and analysis to inform our decisions. We want to send the most effective messages that we can.

In order to work out who to contact, what to say and when to get in touch, we may undertake in-house research to identify people who may be able to support us, using publicly available records.

We may also collect information on your interests, for example your hobbies. We use this type of information to tailor our activities and develop project ideas.

9. Your debit and credit card information

We do not collect payment or other banking information from you directly apart from in limited scenarios if you are a volunteer and we need to pay you expenses or if you are an employee, for payroll purposes:

If you use your credit or debit card to donate to us, those payments are currently processed by secure third party websites, such as:

www.paypal.com

<https://pay.gocardless.com>

<https://localgiving.org>

<https://www.justgiving.com>

<https://www.charitycheckout.co.uk>

We do not receive full credit or debit card details, following the completion of your transaction. Please review the Privacy Policy of each provider should you wish to know how they manage your personal information.

10. Your rights and choices

This section gives more detail about the following rights related to your personal information:

- The right to request that inaccuracies be corrected
- The right to request a copy of personal information held about you
- The right to request us to stop processing your personal data
- The right to withdraw consent

- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

You can help us keep our records up-to-date by telling us when your contact details or other personal information changes. You can also change your mind at any time about how we contact you or ask us to stop contacting you altogether. Where you have provided your consent for our use of your personal information, you have a right to withdraw your consent at any time. Please contact us on tanyardyp@hotmail.com to request this or by post to the address provided below.

It is important to be aware that some information you have given us will be in the public domain if you have consented to this, for example, if you participate in promotional activity, filming or if you feature in our advertising materials. This may mean that it may not be possible to withdraw this material from circulation, so please think carefully about the consequences of consenting to your information being used in this way, before signing any forms with us.

You have a right to request a copy of the personal information we hold about you, and to have any inaccuracies corrected.

You also have the right to request us to erase your personal information, request us to restrict our processing of your personal information or to object to our processing of your personal information.

We will comply with our legal obligations in relation to such requests, but please be aware that some information may need to be retained by us for legal reasons, for example if there is ongoing litigation or a reasonable prospect of law enforcement action.

Should you wish to exercise the above rights, please provide as much information as possible about the nature of your contact with us so that we can find your records quickly. We may request confirmation of your identity before we release the information if we reasonably believe this is necessary to safeguard the personal information.

Please address requests to:

Tanyard Youth Project Ltd

The Tanyard

Commons Road

Pembroke

Pembrokeshire

SA71 4EA

If you have concerns about the way in which we have handled your personal information, we ask that you contact us in the first instance by post or email (to the addresses above). If you are still dissatisfied, you have the right to complain to the Information Commissioner's Office (www.ico.org.uk) which oversees the protection of personal data in the UK, or the Fundraising Regulator (www.fundraisingregulator.org.uk), which is responsible for overseeing fundraising activities carried out by charities in the UK.

11. How do we protect your personal information?

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

12. Sharing your personal information

We promise to make all reasonable efforts to keep your details secure. We will only share them with professionals working on our behalf, or on a need to know basis for legal reasons e.g. safeguarding concerns.

We will only ever share your details with other organisations to use for their own purposes if:

- We are required to by law or by a regulator;
- We deem it necessary and appropriate to respond to a legitimate request of assistance from law enforcement agencies;
- We are seeking legal or financial advice e.g. in connection with litigation or suspected fraud;
- Where appropriate, to enforce the rights of the Tanyard Youth Project, its employees, trustees, volunteers and members.

We will not, under any circumstances, share with or sell your personal information to any third party for marketing purposes, and you will not receive offers from other companies or organisations as a result of giving your details to us.

Only where you have given explicit consent to do so, will we disclose your personal information:

- to any stakeholders such as funders, donors, volunteers;
- to members of the press for reporting purposes;
- to the general public in advertising materials.

We may also share your personal information where you ask us to, for example if you have asked us to make a referral to another agency.

13. Where personal information is stored

We store our data in line with our Data Protection policy, using secure physical safeguards (e.g. in locked filing cabinets in lockable offices) and secure IT systems, (e.g. password protected computers and systems).