



## **Privacy Notice Policy - Community Sparks Group Members**

### **Vision Statement:**

Door 84 Youth and Community Centre (“Door 84”) is a Registered Charity (Charity Number: 1203574) and operates from premises situated at 84 Lowther Street, The Groves, York, YO31 7LX (Telephone - 01904 623177; website - [www.door84.org.uk](http://www.door84.org.uk)).

Door 84 provides activities for children, young people, adults and (where circumstances permit) their caregivers and families and also works with local community members and other users of its premises.

Door 84 facilitates and coordinates various activities including open access youth and community sessions, community events, open days, residential, day trips, which may include remote supervision, specific project work, mentoring, one to one support working and engagement with other building users.

### **The following definitions shall apply:**

- “The Building” means 84 Lowther Street, The Groves, York, YO31 7LX.
- “Building Users” means other users of the Building.
- “Participants” means children, young people, adults and any other user of the building or of the services offered by Door 84.
- “Worker” means anyone working on behalf of Door 84 including (but not by way of limitation) Senior Managers, Trustee of Door 84, paid staff (whether full time, part time or ad-hoc), volunteers, sessional workers, project workers, agency staff and students.

This privacy notice tells Community Sparks Group Members what to expect when we collect, use, retain and disclose your personal information. It is important to us that you feel safe sharing your information with us. We take care to meet our legal duties and put in place all reasonable technical and procedural controls to protect your personal information for as long as we hold it in whatever format we hold it in. Data is processed in line with the General Data Protection Regulation 2018. If you're unsure about what will happen to your Personal information, please ask us.

**How we use your data**

Your privacy is protected by law which says that we can use your personal information only if we have a proper reason to do so. The reasons why we may process your information are:

- When it is our legal duty;
- When it is in our legitimate interest; or
- When you consent to it

**Special Category Data**

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any disabilities, medical conditions and history, injuries, allergies, medication, health professional information; dietary and access requirements.

We process this special category data on the basis that:

- The processing is necessary for reasons of substantial public interest - (equality of opportunity or treatment)
- processing is necessary to protect your vital interests
- the processing is based on your explicit consent

Below is a list of the ways that we may use your personal information and the reasons we rely on to do so.

<b>Purpose of processing data</b>	<b>Personal info used</b>	<b>Legal Basis for processing</b>
To provide and manage our services and to deliver the project you attend.	All contact information, date of birth and emergency contact details. Special category data including	<b>Legitimate Interest</b> To ensure that we have the correct information for us to administer,

	ethnicity, Health and Medical information.	manage and deliver an appropriate provision (suitable support, activities, trips and events). <b>Legal Obligation</b> To ensure your health and safety when attending Door 84 and comply with our duty of care obligations. <b>Consent</b> (special category data) see additional section above.
To conduct monitoring, research and evaluation of our work.	Contact details, date of birth, employment status, attendance registers, photo and media. Special category data including ethnicity, Health and Medical information.	<b>Legitimate Interest</b> So, we can monitor our reach, assess the impact of our work and inform the future development of our work and events. • This information will also be used to provide anonymous statistical information to fulfil our contracts with Funders. <b>Consent</b> (special category data) see additional section above.
To comply with legal obligations that apply to us, such as Health & Safety and Safeguarding provisions.	Identification details, contact details, date of birth, attendance records. Special category data including ethnicity, Health and Medical information.	<b>Legal Obligation</b> To ensure your health and safety when attending Door 84 and comply with our duty of care obligations. <b>Consent</b> (special category data) see additional section above.
For the purposes of equal opportunities monitoring.	Identification details, date of birth, employment status. Special category data including ethnicity, Health and Medical information	<b>Legitimate Interest</b> To promote an environment that is inclusive, fair and accessible. <b>Legal Obligation</b> To comply with equality legislation. <b>Consent</b> (special category data) see

		additional section above.
To answer your queries and respond to any complaints	Contact details	<b>Legitimate Interest</b> To provide a proactive service to you in case there are any issues with the services we provide.
To enable us to contact you and keep in touch during your time with us. (please see marketing paragraph for specific information)	Contact details	<b>Legitimate Interest</b> (please see marketing paragraph for specific information)
To use information regarding your physical or mental health or disability status and your requirements whilst attending sessions, trips and events.	Special category data including Health and Medical information.	<b>Legal Obligation</b> To ensure your health & safety and comply with our duty of care obligations when attending any of our events, sessions or projects. <b>Legitimate Interest</b> To ensure that we can provide suitable activities and provision for you when attending any of our events, sessions or projects. <b>Vital Interest</b> to protect you when you are physically or legally incapable of giving consent <b>Consent</b> (special category data) see additional section above.
For the purposes of promoting our work.	Photos and video	<b>Consent</b> For the purposes of promoting our work. We will only use photos and videos when you have given us explicit consent to do so. You can withdraw this consent at any time.

We may need to collect additional personal information during the project that is not currently identified on the above list but before doing so we will provide you with a written notice setting out details of the purpose and the lawful basis of why we are collecting that data, its use, storage and your rights.

### **What types of personal information do we handle?**

We process personal information to be able to provide our services to users, to communicate with service users and promote our services. The types of personal information we use include:

- Personal details such as Name, Address, Telephone, Email, Date of Birth
- Employment Status
- Emergency Contacts
- Attendance Registers
- Details of Accidents/Incidents
- Photos & Videos
- Consents that you give us about how we can use your information.
- Special Category Data
- Ethnicity
- Details of any disability, learning difficulties, health and medical information and support needs

This information requires special protection by law – we will always explain what information we require and why it is needed when collecting this data.

- Any consents which you have given us in relation to the processing of your information

### **Where we collect personal information from**

We collect personal information from the following sources:

- Personal information that you give to Door 84 by completing a registration form or trip attendance form
- Attendance register when you attend Community Sparks
- Photos and video taken within our sessions and events
- From an external organisation referring you to our services

### **Who we share your information with:**

We want to assure you that your personal information will be respected and protected from unauthorised disclosure wherever possible.

We may share your information with the following:

- Emergency services in an emergency or if we are legally obliged to do so

- External organisations where we have your consent to refer you to them
- Adult Social Care - if we believe you or someone else may not be safe

## **Marketing**

We may use your personal information to provide you with news and updates about Community Sparks, information about forthcoming events and activities and to keep in touch with you for up to 2 years after your last attendance. This is what we mean by “Marketing”.

We can only use your personal information to send you marketing messages if we either have your consent or a “legitimate interest”. Legitimate interest is when we have a reason in line with the aims of the project to communicate with you about these things (which will not unfairly go against your rights and freedoms). If you have told us you do not want to receive such messages, we will not send them to you.

## **We have a legitimate interest to:**

- Contact you by telephone to help us plan attendance, activities and trips
- Send you newsletters and activity plans about Community Sparks
- Make you aware of events and activities offered by Community Sparks and Door 84
- Contact you to keep in touch up to 2 years after your last attendance unless you ask us not to.

We will ask your explicit consent to send you any other marketing messages.

## **How long will your information be held?**

Please see our *Retention of Documents* Policy for details of retention periods for specific documents. You can access this policy on our website or receive a physical copy by asking a member of staff.

## **Security of your information**

The information you provide on the registration form is stored in paper format and locked in a filing cabinet. Keys for filing cabinets are kept in a passcode protected key cabinet.

Electronic spreadsheets and Databases containing personal information are password protected.

Door 84’s mobile that contains personal information is password protected and kept in a locked filing cabinet when not in use.

Hard drives/ memory sticks that contain personal information are locked away and documents are password protected.

Information that is taken offsite during trips and residentials will be kept on the Senior workers person and documents/devices will be returned to a locked filing cabinet on return to the office.

Only authorised members of staff will have access to your personal information.

### **What are your rights?**

You can exercise any of the following rights by writing to us at:

**Postal Address:** Door 84 Youth Space, 84 Lowther Street, The Groves, York, YO31 7LX

Your rights in relation to your personal information are:

**To be informed:** we must provide fair processing information typically through our privacy notice.

**Access:** you can ask for a copy of the information we hold about you. Door 84 is required to respond within 40 days from receiving the request.

**Correction:** we will use all reasonable endeavours to ensure the accuracy of your personal information. It is your responsibility to ensure that you submit true, accurate and complete information to us. You can have any inaccuracies in your information corrected.

**Deletion:** individuals have the right to have personal data erased. This is also known as 'the right to be forgotten'. This right is not absolute and only applies in certain circumstances.

**Objection/marketing:** you can object to us processing your data in certain circumstances (for example, profiling). If you no longer wish to receive communications from Door 84, you can let us know by contacting us on the above details.

**Restriction:** you can ask us to pause processing your information in certain circumstances (for example, if you are disputing its accuracy).

**Data Portability:** you can ask us to transfer your information electronically to another organisation in certain circumstances.

**Automated decision-making/profiling:** you can ask for access to information about the reasoning behind any decisions taken by automated means. You have the right to ask us to reconsider a decision taken by automated means.

**Withdrawal of consent:** you can withdraw your consent at any time, where consent was the only lawful basis for processing the data.

**How to raise a concern or make a complaint**

If you are concerned or unhappy with the way in which your personal data has been processed, you may in the first instance contact Door 84 using the following details.

**Postal Address:** Door 84 Youth Space, 84 Lowther Street, The Groves, York, YO31 7LX,

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

**Report a concern online** at <https://ico.org.uk/concerns/>

**Call** 0303 123 1113

**Or write to:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Door 84 strives for continuous improvement in our services, processes and protecting data. We will therefore update this privacy notice from time to time. It will always be on our website for you to view.

**We are committed to reviewing our policy and good practice annually and will amend more frequently should legislation or reflective practice highlight the need for amendments.**