



GHM Privacy Notice



Contents

- 1. Introduction 3
- 2. Applicability 3
- 3. Definitions 3
- 4. Document Authority..... 3
- 5. Principles of Policy 4
- 6. Glossary of terms 4
- 7. Your personal data – what is it? 4
- 8. Who are we? 5
- 9. How do we process your personal data? 5
- 10. What is the legal basis for processing your personal data?..... 6
- 11. Sharing your personal data 7
- 12. How long do we keep your personal data?..... 7
- 13. Your rights and your personal data 7
- 14. Further processing 8
- 15. Use of our website..... 8
 - 15.1 Information we collect 8
 - 15.2 Use of cookies 8
 - 15.3 Use of your information 9
 - 15.4 Storing your personal data..... 9
 - 15.5 Disclosing your information 9
 - 15.6 Third party links..... 10
- 16. Contact details..... 10
- 17. Monitoring, Evaluation & Reporting 10
- 18. Document Review 10

1. Introduction

GreenHouse Mentoring is a project of Stopsley Baptist Church, a company limited by guarantee, Registered in England and Wales, Company Number - 7605036, Registered Charity Number - 1150563, Registered Office - Stopsley Baptist Church, St Thomas' Road, Luton, LU2 7XP

GreenHouse Mentoring (GHM) has been operating since 2002.

This document describes data privacy within GHM and the way data is processed and used.

2. Applicability

This document is intended for use by all GHM Sponsors, Management Committee, Staff, Volunteers, Mentees, Buddies, External Persons.

3. Definitions

Within this document, the following definitions are understood:

Volunteers	any person currently volunteering with GHM with a signed Volunteer Agreement;
Service User or Mentee	any young person who has or is receiving service from GHM;
Staff	any member of the GHM Team with a formal written and signed contract;
Buddy	any person who agrees to assist a volunteer by ensuring that mentoring sessions are completed on time and safely;
External Persons	any other person or organisation that has had or is having contact with GHM and does not fall into the above three categories e.g. Sponsors, Schools – family workers, Referrers from Social Services, Health Services.

4. Document Authority

This document is approved by the GreenHouse Mentoring Manager.

Written By	Version/ Date	Comments
Ian Pirks	21/03/2018	Initial Issue
Ian Pirks	17/04/2018	Updated after discussion with Lysle and Ginger
Ian Pirks	15/05/2018	Updated to include legitimate interest legal use

5. Principles of Policy

The following principles will apply within GHM:

- ◆ In all cases, GreenHouse Mentoring staff and volunteers will work within the GHM Vision, Mission & Values statement.
- ◆ GHM values everyone who engages with us by whatever means, and we do all we can to protect their privacy and to make sure the personal data provided to us is kept safe.

6. Glossary of terms

Data controller – determines the information held and how it is processed

Data processor – responsible for processing the data on behalf of the controller

Personal data – information relating to an identifiable person

You – refers to GHM Volunteers, Service Users & Families, Staff and others who use the facilities and services provided by GHM.

7. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

8. Who are we?

GreenHouse Mentoring is a Project of Stopsley Baptist Church and a Service for our Community.

We are a locally focussed, Luton based organisation, established in 2002, committed to provide a safe, supportive and friendly place for young people, volunteers and staff alike.

We provide quality, trained, screened volunteers from diverse backgrounds who choose to consistently meet with, mentor and help referred young people in Luton to take responsibility for their actions, improve their social skills and become more self-confident and resilient.

We love to treat everyone in a uniquely personal way and help them to unlock their potential.

Our service is free to Service Users and Referrers alike.

Stopsley Baptist Church is a company limited by guarantee, registered in England and Wales, number 7605036. We are a registered charity; number 1150563. Our registered office is Stopsley Baptist Church, St Thomas's Road, Luton, LU2 7XP

The Executive Director of Stopsley Baptist Church is the data controller (contact details below). This means GHM decides, in conjunction with him, how your personal data is processed and for what purposes. Data controller responsibilities for specific areas are delegated to key personnel within GHM.

9. How do we process your personal data?

GHM complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

GHM will hold this information securely and use it only for the purposes of GreenHouse Mentoring work i.e.

- ◆ To enable us to meet all legal and statutory obligations;
- ◆ To enable us to provide community services for the benefit of the local public, including discussing a Service User's case with the Referrer or

Local Authority, where it is in the best interest of the young person to do so;

- ◆ To administer staff, volunteers and user records;
- ◆ To fundraise and promote the interests of the charity;
- ◆ To manage our employees and volunteers;
- ◆ To maintain our own accounts and records (including the processing of gift aid applications);
- ◆ To inform you of news, events, activities and services running within GHM;
- ◆ To share your contact details with GHM staff team members, volunteers and 3rd parties who assist us in providing services to you;
- ◆ Very occasionally, to promote our services through photographs, sound recordings and videos. We will never place the personal image of a Service User on our website or social media pages.

Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

Your data will be held securely in electronic or paper format.

10. What is the legal basis for processing your personal data?

Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about GHM events.

Processing is also necessary for our legitimate interests (or those of a third party). We may also use your personal information in the following situations, which are likely to be rare:

- (a) Where we need to protect your interests (or someone else's interests);
- (b) Where it is needed in the public interest [or for official purposes];
- (c) To be able to offer services, when a third party has referred details and we have yet to be able to contact you and request more specific consent;
- (d) Where it is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.

11. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with;

- ◆ GHM Staff
- ◆ GHM Admin Volunteers
- ◆ The Referrer or Local Authority, where it is in the best interest of the young person to do so;

in order to provide a service to you or for purposes connected with the work of GHM. We will only share your data with other third parties outside of GHM with your consent or as required by law to do so.

12. How long do we keep your personal data?

We will keep your personal information only as long as we consider it necessary. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

Specifically, we retain details of donations, gift aid and salary payments for 6 years to meet tax and accounting requirements.

See our Retention Schedule for detailed information (on web site under About Us/ GHM Policies)

13. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- ◆ The right to request a copy of your personal data which GHM holds about you;
- ◆ The right to request that GHM corrects any personal data if it is found to be inaccurate or out of date;
- ◆ The right to request your personal data is erased where it is no longer necessary for GHM to retain such data;
- ◆ The right to withdraw your consent to the processing at any time;
- ◆ The right to request that SBC provide you with your personal data and where possible, to transmit that data directly to another organisation, (known as the right to data portability), where applicable;

- ◆ The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- ◆ The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- ◆ The right to lodge a complaint with the Information Commissioners Office.

14. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

15. Use of our website

15.1 Information we collect

In running and maintaining our website we may collect and process the following data about you:

Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.

Information provided voluntarily by you. For example, when you register for information or make a purchase.

Information that you provide when you communicate with us by any means.

15.2 Use of cookies

Cookies provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information about your computer in order to assist us in improving our website.

We may gather information about your general internet use by using the cookie. Where used, these cookies are downloaded to your computer and stored on the computer hard drive. Such information will not identify you

personally. It is statistical data. This statistical data does not identify any personal details whatsoever.

You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

15.3 Use of your information

We use the information that we collect from you to provide our services to you. In addition to this we may use the information for one or more of the following purposes:

- ◆ To provide information to you that you request from us relating to our services.
- ◆ To provide information to you relating to other services that may be of interest to you. Such additional information will only be provided where you have consented to receive such information.
- ◆ To inform you of any changes to our website, services or goods.

15.4 Storing your personal data

In operating our website it may become necessary to transfer data that we collect from you to locations outside of the European Union for processing and storing. By providing your personal data to us, you agree to this transfer, storing or processing. We do our utmost to ensure that all reasonable steps are taken to make sure that your data is treated stored securely.

Unfortunately, the sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data that you choose to send us electronically. Sending such information is entirely at your own risk.

15.5 Disclosing your information

We will not disclose your personal information to any other party other than in accordance with this Privacy Notice and in the circumstances detailed below:

Where we are legally required by law to disclose your personal information.

To further fraud protection and reduce the risk of fraud.

15.6 Third party links

On occasion we include links to third parties on this website. Where we provide a link it does not mean that we endorse or approve that site policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

16. Contact details

To exercise all relevant rights, queries or complaints please in the first instance contact the Executive Director, Stopsley Baptist Church, St Thomas’s Road, Luton, LU2 7XP or telephone 01582 727352.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

17. Monitoring, Evaluation & Reporting

Compliance with this privacy notice is monitored by the GHM Manager, in conjunction with the Executive Director.

The contents will be reviewed, a minimum of every 3 years.

18. Document Review

Next policy review due before: March 2021

Policy last reviewed on: 17/04/2018

Approved by:

Sue Pirks

(GreenHouse Mentoring Manager)

Date

GHM Privacy Notice

15 May 2018
Last Update

Lysle Osborne
(SBC Executive Director)

Date