

PRIVACY POLICY – Quaggy Development Trust

We have updated our Data Protection Policy and Privacy Policy to comply with the changes in data protection law under the new General Data Protection Regulation (GDPR). This Privacy Policy explains our practices regarding the collection, use and disclosure of certain information by Quaggy Development Trust (QDT), including your choices and personal information.

Data Protection principles

We comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained
3. Relevant to the purposes we have told you about and limited to those purposes
4. Accurate and kept up-to-date
5. Kept only as long as necessary for the purposes we have told you about 6. Kept securely.

Personal data means any information about an individual and from which that person can be identified.

Collection of information

We receive and store information about you which may include:

You and your families' details when you register with a Children's Centre:

- Name
- Telephone numbers
- Email addresses
- Address
- Date of birth
- Education and Employment status
- Ethnicity
- Gender
- Asylum seeker status
- Disability or special need details

We also collect and keep other information such as:

- Children's records
- Family Files
- Registers of attendances
- Accident forms
- Feedback from surveys and questionnaires
- Compliments, complaints and suggestions

Information from our website:

Your name, telephone number and email. We collect this information online when you complete a contact form on the website.

Information we collect automatically via the use of cookies, for example:

- Information about your use of the website
- The requested web page or download with date and time you accessed the website
- The internet address from which you accessed the site
- Details about your device, browser and operating system for support purposes

Use of cookies

In order to do this, we may send cookies to your device. Cookies are text files that let us identify your device, carry out transactions and capture the information above. You can adjust the settings on your device to decline use of cookies by the QDT website, however this may limit your ability to carry out certain functions of the website. Please contact the supplier of your device for instructions on how to do this.

Use of information

We collect data in order to administer, deliver and monitor our services so that we can make sure they are appropriate and so we can make improvements to our performance. We use data to support families to fundraise to support our work, to respond to enquiries and complaints and to meet our contractual and legal obligations. We can provide you with information about how to access our services if you request it.

Safeguarding

We have a statutory duty to record any incidents around the safeguarding of children and child protection. Any data is stored securely and is only shared with relevant third parties as required by law according to legal requirements,

Consent – your choices

We will only contact your personal email address if we have your consent to do so. All our marketing email communications include clearly visible unsubscribe and opt-out links for changing preferences. You can opt out of communications at any time by emailing privacy@quaggychildrenscentre.org.uk

Disclosure of information

Information collected by us will be used by QDT only and not passed to third parties unless you have given consent, except where the product or service is delivered by a third party on our behalf, or we are obliged by law to do so. If those third parties are based outside the EU, we will ensure that their data processing activities are compliant with EU law. Only the data that is necessary to perform the task is accessed and processed.

We will only keep data for as long as necessary. Only authorised employees and partners (employability programme), and those who process data on our behalf (e.g. software suppliers) have access to data.

QDT **does not** sell any personal data that we hold. QDT shares personal data with the following parties:

- Member organisations and partners delivering our programmes (for the purposes of networking and access to opportunities)
- Funders will receive aggregated and anonymised statistics only. These are shared with funders to demonstrate the impact of participation in our programmes
- HMRC and other organisations for the performance of employee contracts and processing Gift Aid payments
- Social Services, emergency services, the Health and Safety executive, local authorities and the police in the event of an emergency or in the event of a safeguarding issue (e.g. there is a risk to the safety of a young person or any other party) or to law enforcement agencies for the prevention and detection of crime
- Where we have a legal or regulatory obligation we will share data/information with the police, law enforcement agencies, the Government and statutory agencies or any other necessary parties
- The Disclosure and Barring Service (DBS) for the purposes of verifying suitability of those working with children and young people

Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, projects, or fundraising activities and appeals. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We also may need to share your names with partners and venues hosting events for the purpose of registration.

Using media content (photo, video and audio content)

To help promote the value of our work QDT uses a range of media. Photos, videos and audio content may be used by QDT, or by our event partner(s) (including funders) and member organisations on websites, social media, promotional materials, publications, press releases or other illustrations of our work.

We will ask for consent from individuals that will be used in photos where they may be identifiable. Where the individual is under the age of 18 or a vulnerable adult we will seek consent of the parent/guardian. Consent can be withdrawn at any time. If consent is withdrawn we will stop using the photos/videos/audio content for future purposes but may not be able to retract publications already in the public domain.

Retention of information

We retain your information for as long as required either by UK or EU law and/or as long as we need it to provide you with services or information you have requested or signed up to, in line with our archiving policy.

Use of QDT website(s)

Within our website, we link to other useful organisations' websites that may be of use to you; however we do not endorse the information on these websites and are not responsible for the websites' content. QDT cannot be held responsible for the privacy of data collected by these sites. You should review their privacy policy before sending them any personal data.

We make every effort to ensure that viruses, malware and other malicious software is excluded from our website, however we advise that you take appropriate precautions to protect your device.

QDT cannot be held responsible for any consequential damage from malicious software or any other use of our website, products or services.



Your information and rights

You have a number of rights under the GDPR, which include:

- The right to request a copy of the data that QDT holds about you
- The right to prevent processing for the purpose of direct marketing and profiling
- The right to be forgotten
- The right to have data rectified/updated

Accessing your data

- You are entitled to make a request to gain access to a copy of the data we hold and to find out how we use your data.
- You may make a request at any time by contacting us at privacy@quaggychildrenscentre.org.uk for a Subject Access Request Form
- Your request will be processed free of charge. In the event of repeated/excessive requests QDT reserve the right to charge a fee.
- When making a request, we will verify that you are who you say you are by checking appropriate forms of identification

The right to be forgotten

If you no longer wish for QDT to store and process your data, you have the right to request that it be deleted. You can request this verbally or in writing and we will respond within one month of the request.

Under the GDPR QDT must respond to a request to have your data erased, however there are circumstances where we will be unable to erase data due to other obligations. For example:

- Where there are financial transactions on your record (where part of the data must be kept for a set period of time). In this instance, we will keep the data that must be held for financial and audit purposes and will erase all data not required for this purpose
- Where there has been a disciplinary/safeguarding issue etc

Full details and an explanation of our decision will be communicated to you.

The right to rectification

Individuals about whom we collect, process and store data have the right to have inaccurate data rectified or incomplete data completed.

If your data is inaccurate or incomplete, you have the right to request that we rectify it. QDT will respond to a request within one month of receipt. However, in certain circumstances we reserve the right to refuse a request (e.g. where there has been a disciplinary or safeguarding issue and the recorded information is a record of findings of an investigation).

Complaints

If you have any concerns or questions about your data, the information contained within this notice or our Data Protection Policy, or you wish to make a complaint please contact us.

If you are dissatisfied, or if you believe your data has been processed in a way that is not compliant with the GDPR, you have the right to complain to the Information Commissioners Office (ICO) by visiting their [website](#) or by calling [0303 123 1113](tel:03031231113).