

G-06 Privacy Policy

Version	Date of change	Changed by	Trustee approval	Notes
1.0	22/06/2018			First issue
2.0	5/07/2024	LMW		Transferred to new template
2.1	6/1/2025	LMW		Updated CCTV paragraph

Privacy Notice (including use of Cookies)

Haxby & Wigginton Youth & Community Association (HWYCA) promise to respect the confidentiality of any personal data you share, or that HWYCA has access to, to keep it safe, and will always take every effort to protect your privacy.

HWYCA takes pride in being honest and openness and will always be clear how, when and why personal information will be collected and processed. HWYCA promises to never do anything with your details that you wouldn't reasonably expect.

Developing a better understanding of employees, volunteers, and members is crucial to the work carried out by HWYCA, and your personal data allows HWYCA to manage your employment, volunteering and membership and provide the services you are entitled to.

Your information is collected in the following ways:

When you provide it DIRECTLY

There are many ways you may provide HWYCA your information. For example, when you join as a member, begin volunteering, make a donation or communicate with HWYCA either by phone, in writing, including email or in person. HWYCA is responsible for your data at all times.

When you provide it INDIRECTLY

There may be occasions when your information may be shared with HWYCA by independent organisations, for example sites like Virgin Money Giving or BT MyDonate or other such services. These independent third parties will only share your information when you have consented. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

Via Social Media

Depending on your settings or the privacy notices for social media and messaging services like Facebook or Twitter, you may give HWYCA permission to access information from those accounts or services.

Cookies

Like most websites, HWYCA uses “cookies” to help make the HWYCA website, and the way you use it, better. No personal data is stored in these “cookies”.

Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you’re using to access HWYCA website or apps and the settings on that device may provide information about your device, including what type of device it is, what specific device you have, what operating system you’re using, what your device settings are. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

The type and quantity of information collected by HWYCA and how it is used depends on why you are providing it. You are able to control what cookies are placed on your device through your browser settings. Go to www.aboutcookies.org to find out more about cookies, including how to see what cookies have been set and how to manage and delete them.

Google Analytics is used to analyse the use of the HWYCA website by generating statistical and other information.

Details captured during your visit to the HWYCA website will include, but is not limited to, traffic data, location data, weblogs and other communication data and the resources you access. However, all data collected is anonymous and will not identify you as an individual.

Google, not HWYCA, stores this activity information. You can view Google’s privacy notice here: <http://www.google.com/privacypolicy.html>

To opt out of being tracked by Google Analytics across all websites visit their website at <https://tools.google.com/dlpage/gaoptout>.

What personal information is collected and how it is used

HWYCA will only capture the minimum amount of information needed in relation to your membership, donation or services provided to you and this information will be kept secure. The personal data usually collected includes:

- Your name
- Your contact details
- Your date of birth
- Your bank or credit card details (as relevant to the service provided)

- Details of the enquiry or service
- Where it is appropriate additional information may also be requested

How your data will be used

Your personal data will be used for the legitimate interest of conducting core business activities, these will include:

- Administering your membership or donation, including processing Gift Aid
- Providing you with the services, products or information you request
- Providing services, products, guidance or information including obtaining Disclosure and Barring Service (DBS) checks where relevant and necessary
- Communicating organisational messages and information to employees, volunteers and members
- Facilitating meetings and other special event planning
- Providing information and updates
- To present the HWYCA website and its contents to you and to allow you to use it's interactive features
- For HR/Employment records for staff
- Keeping a record of your relationship with HWYCA
- Understanding how to improve the services, products or information provided by HWYCA
- In any other ways that may be described when you provide the information
- For any other purposes with your consent

Sensitive information

HWYCA does not collect any personal information on volunteers or members classified as 'sensitive' under GDPR.

Employees

HWYCA will collect all personal information required to comply with employment legislation, including where necessary sensitive information. This may include medical information and, where additionally appropriate, a criminal record search. To prevent discrimination and to ensure diversity, information from the employee on religion, sexuality and ethnicity may be requested.

Under 18's data

HWYCA has a legitimate interest in holding personally identifiable information about those under 18 who have contact with the youth provision service, as necessary to protect the vital interests of the young person. Where possible consent for holding this information will be requested from the parent/caregiver of the young person.

CCTV

HWYCA operates a CCTV system. Two cameras are positioned at the front of the building and data from these cameras is stored on a secure cloud. More information about this can be found in the P-20 CCTV Policy.

Recording Telephone Calls

HWYCA does not use a voice-telephony system.

Data Sharing

1) Service and host providers

In the course of legitimate business activities, there may be a need to share or provide access to your personal data, to third parties that provide services or host HWYCA applications/software, for instance:

- Banking organisations – those that provide banking/payment services
- HMRC – for Gift Aid, tax and employment details

All data processing agreements will be compliant to GDPR and will be in place before sharing with or giving access to your personal data with any third party.

2) Sharing with third parties

Your data will never be sold commercially to any one else.

Your personal data will not be shared in circumstances other than those listed above, unless you provide your explicit and informed consent at the time of collection. However your details may be disclosed if required to the police, other agencies, for example HMRC, regulatory bodies or legal advisors.

How your information is kept safe and who has access to it

There are appropriate physical and technical controls in place to protect your personal details. For example, confidential paper records are securely stored, the network used by HWYCA is protected and routinely monitored. Confidential paper waste is shredded at the premises.

Reviews of who has access to information are undertaken regularly to ensure that your personal information is only accessible by appropriate staff and service providers. Should the need to engage third party companies arise, HWYCA will carry out comprehensive checks on the third party before working with them. HWYCA will emphasise the requirements and expectations of third parties, regarding how they manage and collect personal data they have access to in accordance with the above. This will be enforced through an appropriate contract between HWYCA and the third party.

HWYCA has a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, will do this within 72 hours of becoming aware of the breach. If a

breach is detected and likely to result in a high risk of adversely affecting you, you will be informed without undue delay.

Where your information is stored

Your personal information will be hosted securely within the UK by HWYCA.

How long your information is retained and how it is kept up to date

Your information is only needed for as long as to assist you with your enquiry, process your membership, donation, or other services associated with your employment, volunteering or membership. There are statutory timescales for how long information of different natures can be stored by HWYCA. For example, gift aid transactions must be retained indefinitely, employment records for 6 years after an employee leaves, financial records must be kept for 7 years, information associated with Health & Safety for three years after an event. Your information shall be deleted in accordance with these statutory limits or according to guidance issued by the Information Commissioner.

Where necessary, your information will be kept accurate and up-to-date.

Your rights

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the Information Commissioner's website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- You have a right to be informed when your personal data is being collected, what is collected and how it will be used or shared.
- You have a right of access to your personal data: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal data. You can also request a copy of your information held by HWYCA. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive then a reasonable fee will be charged. The application should be made in writing, by letter or email, and addressed to the Manager HWYCA, at the address below, enclosing two proofs of identification. Applicants should be aware that where requests are manifestly unfounded or excessive, in particular because they are repetitive, HWYCA can:
 - charge a reasonable fee taking into account the administrative costs of providing the information; or
 - refuse to respond.
- You have a right in certain circumstances to have inaccurate personal data rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.
- You have a right in certain circumstances to object to the processing of your personal data for such reasons as direct marketing, automated decision making, profiling; although HWYCA does not use an automated process to make decisions.
- You have a right in certain circumstances to data portability.

In certain situations, these rights may not apply, for example: if you are a valid member HWYCA is required to communicate with you about your membership and those services afforded to you as part of that membership; you hold a key volunteer role and HWYCA needs to communicate with you in relation to that role, in which case you will not be able to unsubscribe from these communications.

HWYCA will only collect and process your personal data through legitimate interests or because you have provided it in order to receive a service from HWYCA. Your personal data will only be processed as you would reasonably expect it to be. You can opt out of general member mailings at any time.

If you are unhappy with how HWYCA has processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

Changes to this privacy notice

HWYCA reserves the right to amend this privacy notice at any time. If any significant changes are made to how your personal information is treated, you will be notified directly.

HWYCA Contact details

Haxby & Wigginton Youth & Community Association
Oaken Grove Community Centre
Reid Park,
Oaken Grove,
Haxby,
York
YO32 3QW

Tel: 01904 769176
Email: info@hwyc.co.uk

Complaints

If you are unhappy with how HWYCA have processed your personal information, please firstly contact the HWYCA Manager, details above. If you are still unhappy you may contact the following:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or ++44 1625 545 745