

Young Devon Privacy Policy

This policy applies to the work of Young Devon, to all websites operated by Young Devon or Young Devon Trading Ltd, our use of emails and text messages for marketing purposes and any other methods we use for collecting information on users of our services, their parents or carers. It covers:

1. Who we are
2. Why we process information
3. The information we collect
4. Our commitment to you
5. How we use and share your information
6. Where we get information from
7. How long we will keep information and how we keep it safe
8. Website cookies
9. Your rights
10. Concerns and complaints
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1. **Who we are**

Young Devon is a charity committed to changing the odds in favour of young people. We help young people with a variety of needs who often need support from more than one of our services.

We support some of the most vulnerable and at risk young people within our county across our four themes of

- accommodation,
- wellbeing,
- skills,
- participation.

Our trading subsidiary, Young Devon Trading, runs a social enterprise restaurant, Market Street, based in Newton Abbot with any profits being re-invested in the charity.

2. Why do we process information?

We wouldn't be able to do our job without processing some information. In general there are six reasons organisations can process your personal information and we may use these in different cases. They are:

| | |
|-----------------------------|---|
| Consent: | You have told us it's OK. |
| Contractual: | We have an agreement or contract with you or are working with someone, like a college, who does. |
| Legal Obligation: | We have to comply with the law and so there may be times we process information for statutory reasons. |
| Vital Interests: | In extreme cases it might be necessary to process your information to protect your health and well-being. |
| Public Task: | Your personal information might be processed to carry out a legal public duty (it's unlikely we would do this – it's more for the police and local authorities). |
| Legitimate interest: | We might process your information if we believe there is a lawful reason to do so and that it's appropriate to use the information in that way. It could be as simple as using your information to reply to a question you have sent us or processing information to make sure our records are accurate or protect legal interests. |

3. What we need and why we need it

We need to process information to carry out our work, meet our objectives and comply with the contractual obligations placed on us by our funders. We will only ever collect the information that we need to do this from you. This includes information that we need to help us improve our services.

The information that we collect is needed to help us fulfil any requests that you make, enable us to provide you with a personalised service that best meets your needs and to let us keep track of the impact that our support has on a young person's life

We collect different kinds of information:

- Personal information such as name, postal address, phone number, email address, date of birth (where appropriate), information about the support you need from us.

- Records of our work with you including any conversations or correspondence which is used in delivering our services to you.
- Special category information such as race, ethnic origin, religion etc.

Sometimes we need emergency contact information and ask for this as part of our sign-up process. If we support a young person under 13 we require parent/carer consent. GDPR allows young people over 13 to consent to us keeping their information and processing it themselves.

Under UK law young people aged 13 and above are entitled to confidential support and guidance (which by definition will sometimes be without parental knowledge or consent). Using information in this way is known as 'Legitimate Interests'.

To protect information we use reference numbers (pseudonymise) to make it harder for others to identify who you are from these records. We may not be able to provide you with certain services if you choose to withhold information that we are required by law or contract to collect.

You do not have to disclose any of this information to browse our website or view our social media platforms.

Non-personal information such as IP addresses (the location of the computer on the internet), pages accessed and files downloaded. This helps us to determine how many people use our site, how they use it and how often. The information doesn't tell us anything about who you are or where you live. This simply allows us to monitor and improve our services.

4. **Our commitment to you**

- We'll always ask your permission before using personal information for purposes other than it was collected for, unless we have to carry out a legal duty.
- Only share it with others as we are allowed to by law or as has you have approved.
- Do everything that we can to make sure that the information that we hold is accurate and update records if you tell us it is inaccurate.
- Only hold the information that we need to.

- Not keep information for longer than needed.
- Treat all information confidentially and store it securely

5. How we use and share your information

We will use your information to:

- Record the services that you have used, what we have done for you, how we helped and how you are when you stop using our services. We use this information to make sure we are delivering the best services that we can and we will share it with the places, such as councils, colleges, charities and funders, so we can report back to them on the work that we have done.
- Record any contact that we might have with you.
- Fulfil any requests that you might make. This could be job applications, donations, participation in campaigns or providing you with information that you have asked for or have agreed to receive.
- Send you information that we think will interest you but only if you have agreed that we can do this.
- Provide personalised services to you when you visit our websites. This could be giving you access to specific content that is helpful to an individual user.
- Carry out analysis of the demographics, achievements and behaviour of our beneficiaries so that we can get a better understanding of what works for them so that we can improve our services. We may do this research ourselves or we could ask an outside company to do this work on our behalf.
- Process sales transactions, donations or any other payments and verify financial transactions.
- Detect or prevent fraud or abuse on any of our digital platforms and to all third parties who carry out technical and other functions for us.
- Communicate with our beneficiaries, donors and commissioners

We will only use your information for marketing if you have agreed to it. For us to do this you must have opted-in. This means that we only send information to people who have specifically agreed and we will only send information in the ways that that have agreed to. Marketing information includes information about Young Devon Trading and the good and services that they sell. We will also tell you about our

fundraising activities and the services that we offer to our beneficiaries and other organisations.

If you want to receive information like this but haven't opted-in you can by emailing info@youngdevon.org. You can stop receiving information from us whenever you want to. We will include a link to opt-out of receiving all future message in everything that we send to you. You can change how or if we communicate with you by emailing info@youngdevon.org.

We only share your information when:

- We are required to by law e.g. by an enforcement agency that is legitimately exercising a power or if we are compelled to by a Court Order.
- We need to protect or defend our rights, property or the personal safety of our beneficiaries, visitors to our buildings and website or the people who work for us.
- We work with partner organisations who support us in delivering our programmes and they may carry out work on our behalf. These partners may include marketing agencies, mailing houses and IT specialists. The work they do for us includes sending mail by post or electronically, carrying out research or processing payments. We are very careful in the organisations who do this for us and will only pass personal information to them if they have signed a contract that requires them to:
 - abide by the requirements of the Information Protection Act
 - treat your information as carefully as we would
 - only use the information for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation)
 - allow us to carry out checks to ensure they are doing all these things.
- We will share information with organisations who commission us to work for them and deliver services.

The software programmes that we use are:

- Views
- Outcomes Star
- IAPTUS

6. Where we get information from

We collect personal information from different groups of people. We get your information in different ways depending on the group you are in:

Beneficiary information: Some information is shared with us through referrals to our services by other agencies. We also get your information through referral forms that you or your parent/carer has filled out and sent to us. This can either be on paper or through a form on our website. You may have shared this information with us yourself when you signed up for a course like NCS or Prince's Trust. It could have been by completing a form on paper or online but also if you came into one of our buildings and completed the form with us.

Marketing information: We collect this information through specific activities such as newsletter requests, buying something from us, making a donation, completing a feedback form, or entering a competition.

We also use cookies on our website. See below for further information (section 8).

7. How long we hold your information and how we keep it safe

We will keep your information only for as long as we need it to provide you with the services or information that you have come to us for; for us to administer our relationship with you; to inform our research; to comply with the law or contractual requirements placed on us; or to ensure we do not communicate with people who have asked us not to. When we no longer need it we will dispose of your information securely and may use specialist external companies to do this.

We use robust and appropriate, physical, technical and managerial controls to make sure we protect personal information provided to us, whether it's electronic or physical. Any 3rd party providers we use have a long history of accredited operations and are used by many national and international organisations.

In the unlikely event of a breach of our measures to keep personal information safe we will inform individuals 'without undue delay' where the breach could result in ID theft or fraud; physical harm; significant humiliation and/or damage to reputation. Such breaches will also be reported to the Information Commissioner's Office.

8. Our website cookies

Our website uses cookies to enhance user experience. Your use of our website and any disclosure of personal information via the website signifies your consent to us collecting and using personal information about you in accordance with this privacy policy. You acknowledge that the Internet is not a 100% secure medium for communication and, accordingly, we cannot guarantee the security of any information you send to us (or we send to you) via the Internet. Young Devon is not responsible for any damages which you, or others, may suffer as a result of the loss of such information. Details of our cookies use can be found in our Cookies' Policy.

9. Your rights

GDPR and The Information Protection Act give you certain rights over your information and how we use it. These include:

- Under certain circumstances to have inaccurate personal information rectified, blocked, erased or destroyed
- Preventing us from using your information for direct marketing
- Access to a copy of the data that we hold about you (this is a Subject Access Request)

It's important that you know your legal rights when it comes to the processing and control of your personal information. You should read the information provided at www.knowyourprivacyrights.org, it will tell you what you need to know. Your rights regarding processed information will be different depending how it's been collected:

| <i>Reason for processing</i> | <i>Right to erase</i> | <i>Right to portability</i> | <i>Right to object</i> |
|-------------------------------------|------------------------------|------------------------------------|-----------------------------------|
| Consent: | | | No – but you can withdraw consent |
| Contractual: | | | No |
| Legal Obligation: | No | No | No |
| Vital Interests: | | No | No |
| Public Task: | No | No | |

Legitimate interest:

No

If you wish to exercise any rights please contact the Information Protection Officer at the address below.

Please note that it is our policy to charge the statutory maximum fee of £10 for a Subject Access Request.

For more information about your rights under GDPR and the Information Protection Act go to the website for the Information Commissioner's Office at www.ico.org.uk.

10. Concerns or complaints

If you need to raise a concerns or register a complaint you can contact us in any of the following ways:

Phone: 01752 691511

In writing: Information Protection Officer,
Young Devon,
10 Erme Road,
Ivybridge,
PL21 0AB

Email: info@youngdevon.org.

Website: <http://www.youngdevon.org/contact>

Twitter: @YoungDevon

Facebook: www.facebook.com/youngdevonofficial/?fref=ts

11. Changes to this policy

Changes will be made to this notice from time to time without directly informing you, so please check it regularly. It will be reviewed annually by our information control lead and trustees.