

# BOYS & GIRLS CLUBS PRIVACY POLICY

## PRIVACY STATEMENT

Boys & Girls Clubs is a Regional Voluntary Youth Organisation that works to support, represent and promote the interests of young people and affiliated youth clubs and youth organisations. As such, we want to make sure you receive information and communications from us that are most relevant to you, be it through visiting our website, receiving emails, e-circulars, post or phone calls. As a valued member / colleague, we want to make sure you receive the best support, information and communications from Boys & Girls Clubs.

Boys & Girls Clubs is registered as a data controller with the Information Commissioners Office. Our registration number is Z1811913 and our registered address is: Boys & Girls Clubs, 22 Stockman's Way, Musgrave Park Industrial Estate, Belfast, BT9 7JU.

Boys & Girls Clubs recognises the importance of privacy of personal information. We are responsible for the personal information we collect, use, maintain and disclose. We are therefore committed to protecting the security and privacy of this information. To ensure this accountability, we have developed a set of privacy statements, and have trained our staff about our policies and practices.

This Policy may change from time to time and, if it does, the up-to-date version will be made available on our website and/ or we may contact you directly.

## COLLECTION OF PERSONAL INFORMATION

The type of personal data we may collect from you varies according to the nature of the engagement or activity with us in which you may be involved.

Some examples of the type of personal data we may collect and/or receive during the normal course of our engagement with you are:

- Identification and contact information (such as, but not limited to; name, address, email address, telephone number)
- Volunteering Experience (such as, but not limited to; current and past service or volunteering and work experience)
- Activities of daily living Information (such as, but not limited to, transportation availability, weekly diary of times available to volunteer)
- Health information\* (such as, but not limited to medical history and treatment)
- Own Insurance Cover
- Bank details

- Skills and Qualifications (such as, but not limited to; evidence of educational attainment; professional body registration relevant to the role you are undertaking).
- References
- Access NI ID verification
- Criminal convictions\* (if undertaking a regulated activity working with vulnerable adults and young people)
- Information relating to the reporting and monitoring of equality of opportunity and diversity in our organisation\*.

## **PURPOSE OF USE AND LAWFUL BASIS FOR PROCESSING**

The lawful reason that allows Boys & Girls Clubs to process your personal information is called ‘legitimate interests’. This means that the reason that we are processing information is because there is a legitimate interest for Boys & Girls Clubs to process your information to ensure the role you undertake is suitable to you and enables us to achieve our vision and ensuring that everyone engaging in our activities gets both respect and support.

Whenever we process your personal Information under the ‘legitimate interest’ lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

\* This is known as special category data and is held by Boys & Girls Clubs for several reasons including:

- making adjustments to your role to accommodate health conditions
- where we have a legal obligation to ensure suitability for role
- Where it is needed in the public interest, such as for equal opportunities monitoring

Where we collect special category data, we will ask for your informed consent as the lawful basis for processing.

## **PROTECTING PERSONAL INFORMATION**

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Electronic information processed by Boys & Girls Clubs is stored in a secured cloud database to which only our staff team has access and is authorised to view and process your personal information. Access to all our cloud data is by named licensed users only and is password protected. Our data is hosted in a secure server environment which uses a firewall and other advanced technologies to prevent interference or access from outside intruders.
- Electronic hardware is either under supervision or secured in a restricted area at all times. In addition, all IT equipment and mobiles are password protected.
- Paper information is kept secured in a locked or restricted area and/or cabinet.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or is anonymised or encrypted.

- Our personnel are trained to collect, use and disclose personal information only as necessary to fulfil their duties and in accordance with our privacy policy.
- External consultants, agencies or suppliers with access to personal information must enter into privacy agreements with us.

## **SHARING YOUR PERSONAL DATA**

Where we use an external service provider to act on our behalf, we will disclose only the personal information necessary to deliver the service and will have a contract in place that requires the provider to comply with Boys & Girls Clubs data protection and information security requirements.

As a funded organisation, Boys & Girls Clubs may be required to share the contact information of our Board Members and others in order to meet the aims and objectives of the organisation. Circumstances include but are not limited to sharing details in funding applications, bank account applications, Charity Commission and Companies House annual reporting.

We also regularly share anonymised information with our funders, however at times we are also subject to a funder's audit requirements, requiring Boys & Girls Clubs to provide evidence and personal information.

We will never share, sell or swap your details with any third parties for the purposes of their own marketing or the monetising of your data.

## **IF YOU GIVE US SOMEONE ELSE'S DATA**

Sometimes, you might provide us with another person's personal data – e.g. parental / guardian consent forms, details of emergency contact or references. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

## **RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

We retain your personal information as per Boys & Girls Clubs data retention policy and data processing register which is guided by requirements related to law and professional regulations. Your information will be stored in Boys & Girls Clubs offices. We destroy paper files containing personal information by licensed shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

## WHERE DO WE STORE YOUR INFORMATION

For technical reasons we may, on occasion decide to use the services of a supplier outside the European Economic Area (EEA), which means that your personal information is transferred, processed and stored outside the EEA.

By submitting your personal data, you agree to this transfer, storing and processing at a location outside the European Economic Area.

At Boys & Girls Clubs we have taken all steps reasonably necessary to make sure that your data is treated securely and in accordance with this privacy policy. We have done our best to protect your personal data, and ensure that it will be held in compliance with European data protection regulations.

## OBTAINING ACCESS TO AND CORRECTING YOUR PERSONAL INFORMATION

We make every effort to ensure that all of your information is recorded accurately. We ask that you help us keep your information accurate by contacting us at [post@boysandgirlsclubs.net](mailto:post@boysandgirlsclubs.net) should any of the details we have belonging to you change. Individuals can ask to see personal data about themselves that is being held by Boys & Girls Clubs. If an individual wants to exercise this subject access right, there is a procedure to follow. You will be provided with the information only if you have provided satisfactory proof of your identity.

We invite a Subject Access Request (SAR) to be made by:

- Writing to Head of Corporate Services, Boys & Girls Clubs, 22 Stockman's Way, Musgrave Park Industrial Estate, Belfast, BT9 7JU marked Subject Access Request on the outside of the envelope
- By email to [post@boysandgirlsclubs.net](mailto:post@boysandgirlsclubs.net) – Subject: Subject Access Request.

Individuals have the right to have incorrect information held about them changed.

## COMPLAINTS PROCESS:

If you believe that Boys & Girls Clubs has not replied to your access request or has not handled your personal information in a reasonable manner, please contact Boys & Girls Clubs.

If you still feel the situation has been dealt with unsatisfactorily by Boys & Girls Clubs, you can contact: The Information Commissioner's Office, Water Lane, Wycliffe House, Wilmslow – Cheshire, SK9 5AF Tel: 0303 123 1113.

For a copy of Boys & Girls Clubs complaints process please contact [post@boysandgirlsclubs.net](mailto:post@boysandgirlsclubs.net).

#### **FURTHER CONTACT INFORMATION:**

We have tried to ensure that our privacy policy is clear and concise, however, it does not provide exhaustive detail of every aspect of how we collect or use personal data. If you require further information please write to our Head of Corporate Services who will attempt to answer any outstanding questions or concerns.

**Contact:** Head of Corporate Services, Boys & Girls Clubs, 22 Stockman's Way, Musgrave Park Industrial Estate, Belfast, BT9 7JU

Email: [post@boysandgirlsclubs.net](mailto:post@boysandgirlsclubs.net)