

## Dalgarno Trust Fair Processing Policy (GDPR)

**The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.**

We will keep this policy updated to show you all the things we do with your personal data. This policy applies if you are a volunteer, tenant, participant in activities, employee or use any of our services, visit our website, email, call or write to us.

We will never sell your personal data and will only share it with organisations we work with when it is necessary, and the privacy and security of your data is assured.

### Who are 'we'?

In this policy, whenever you see the words 'we,' 'us,' 'our,' 'the Trust,' it refers to the Dalgarno Trust, we are a charity (reg. no. 1105119) and a company (reg. no 05093320) registered as the Dalgarno Neighbourhood Trust.

The Trust is a charitable organisation and runs a community centre serving North Kensington and the wider area. We collaborate with the local communities offering a wide range of activities, projects and services that promote health, wellbeing, and inclusion for both the young and the not so young.

We work in partnership with the Royal Borough of Kensington and Chelsea delivering core services and our youth programme.

Our services include managing and delivering activities including events.<sup>4</sup> If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to [esma@dalgarnotrust.org.uk](mailto:esma@dalgarnotrust.org.uk) or addressed to the Data Protection Officer, Dalgarno Trust, 1 Webb Close, London W10 5QB.

### What personal data do we collect?

Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address) will be collected and used by us. We will only collect the personal data that we need.

We collect personal data in connection with specific activities such as registration or volunteering, conducting research, monitoring attendance, employment etc.

You can give us your personal data by filling in feedback forms, registering as a participant in our projects, registering with our foodbank, using our services, or completing a survey or by corresponding with us (by phone, email).

This personal data you give us may include name, title, address, date of birth, age, gender, employment status, demographic information, email address, telephone numbers, personal description, photographs, attitudes, and opinions).

## Personal data provided by you

This includes information you give when interacting with us, for example joining or registering for a project or activity or communicating with us. For example:

- Personal details (name, date of birth, email, address, telephone, and so on) when you join as a volunteer or become a participating an activity or project.
- Your opinions and attitudes about the Dalgarno Trust, activities and interests, and your experiences of the Dalgarno Trust

If you register as a volunteer, a participant in our activities, a service user or with our foodbank, your details will be recorded and your association with that relationship will be recorded.

## Personal data created by your involvement with us

Your activities and involvement with us will result in personal data being created. This could include details of how you have helped us by volunteering or being involved with our projects and activities.

## Information we generate

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we may be able to build a profile which helps us decide which of our communications are likely to interest you.

## Sensitive personal data

At times we will collect sensitive personal data for Equal Opportunities monitoring, as well as researching whether we deliver great experiences for everyone, but this is only ever analysed at an aggregate level – this means it is anonymous.

## Volunteer

If you are a volunteer then we may collect extra information about you (e.g., references, criminal records check, details of emergency contacts, medical conditions etc.). This information will be retained for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

## Children's personal data

Data on children aged under eighteen is collected for monitoring purposes and health and safety purposes only.

## How we use your personal data

We will only use your personal data on relevant lawful grounds as permitted by the UK Data Protection Act and Privacy of Electronic Communication Regulation.

Personal data provided to us will be used for the purpose outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data.



Your personal data may be collected and used to help us deliver our charitable activities, help us raise funds, or complete the monitoring forms as requested by the Royal Borough of Kensington and Chelsea.

Below are the main uses of your data that depend on the nature of our relationship with you and how you interact with our assorted services, website, and activities.

### Marketing communications

Your privacy is important to us, so we will always keep your details secure. We would like to use your details to stay connected about things that may matter to you.

If you choose to hear from us, we may send you information based on what is most relevant to you or things you have told us you like. We may also show you relevant content online. This might be about upcoming activities, volunteering with us, events, and fundraising.

We will only send these to you if you agree to receive them and we will never share your information with companies or organisations outside the Dalgarno Trust for inclusion in their marketing. If you agree to receive marketing information from us, you can change your mind later.

However, if you tell us, you do not want to receive marketing communications, then you may not hear about events or other work we do that may be of interest to you.

We may sometimes use third parties to capture some of our data on our behalf, but only where we are confident that the third party will treat your data securely, in accordance with our terms and in line with the requirements set out in the GDPR.

We will always act upon your choice of how you want to receive communications (for example, by email, post, or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a participant, volunteer, or user of services from the Trust.

### Fundraising, donations, and legacy pledges

Where we have your permission, we may invite you to support our work by donating, buying a ticket for a fundraising event or a raffle ticket, getting involved in fundraising activities or leaving a gift in your will.

If you donate, we will use any personal information you give us to record the nature and amount of your gift, claim gift aid where you have told us you are eligible and thank you for your gift. If you interact or have a conversation with us, we will note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause, we will use the personal information you give us to record your plans and contact you to support your fundraising efforts.

If you have told us that you are planning to, or thinking about, leaving us a gift in your will, we will use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this.

If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we will note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you wanted.

Charity Commission rules require us to be assured of the provenance of funds and any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation, and ethical principles of donors who have made, or are likely to make, a significant donation to the Dalgarno Trust.

As part of this process, we will conduct research using publicly available information and professional resources. If this applies to you, we will remind you about the process when you make your donation.

## Management of volunteers

We need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include contacting you about a role you have applied for, or we think you might be interested in, expense claims you have made, shifts you have booked and to recognise your contribution.

It could also include information about your volunteering, including asking for your opinions on your volunteering experience.

We may also share this with funders to help them monitor how their funding is making a difference.

## Research

We conduct research with our supporters, customers, staff, and volunteers to get feedback on their experience with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.

If you choose to take part in research, we will tell you when you start what data we will collect, why and how we will use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g., ethnicity). You do not have to provide this data and we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g., equal opportunities monitoring). This is anonymous and only with your consent.

We may give some of your personal data (e.g., contact information) to a research agency who will conduct research on our behalf. Again, we only do this with your consent.

## Profiling

We know it is important to our supporters to use our resources in a responsible and cost-effective way. So, we may use automated profiling and targeting to help us understand our supporters and make sure that:

- our communications (e.g., emails) and services (e.g., our website) are relevant, personalised, and interesting to you
- our services meet the needs of our supporters
- we only ask for further support and help from you if it is appropriate
- we use our resources responsibly and keep our costs down

To do this we will analyse how you interact with us (e.g., when signing into the centre) and understand your interests.

We use specific tools to profile how you interact with us online, for example, Google Analytics. We use Google Analytics to collect information on the use of the Dalgarno Trust website. Much of the information we collect is aggregated, however we may also collect some personal data for the use of personalising your experience, optimising our marketing campaigns, and to ensure the site is functioning as intended.

We do not collect personal information from our website unless you contact us by email using the email addresses provided as we will have your email address.

## Recruitment and employment

To comply with our contractual, statutory, and management obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees.

Such data can include, but is not limited to, information relating to health, racial or ethnic origin, and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it is processed is given below.

**Contractual responsibilities:** Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to payroll, bank account, postal address, sick pay, leave, maternity pay, pension, and emergency contacts.

**Statutory responsibilities:** Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

**Management responsibilities:** Our management responsibilities are those necessary for the operational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to recruitment and employment, training and development, absence, disciplinary matters, e-mail address and telephone number.

## Sensitive personal data

The Act defines 'sensitive personal data' as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual orientation, criminal allegations, proceedings, or convictions.

In certain limited circumstances, we may legally collect and process sensitive personal data without requiring the explicit consent of an employee.

(a) We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

(b) We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation, or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

(c) Data about an employee's criminal convictions will be held, as necessary.

### Disclosure of personal data to other bodies

To carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs.

To fulfil our statutory responsibilities, we are required to give some of an employee's personal data to government departments or agencies e.g., provision of salary and tax data to HM Revenue & Customs.

### Updating your data and marketing preferences

We want you to remain in control of your personal data. If, at any time, you want to update or amend your personal data or marketing preferences please contact us via **email: [esma@dalgarnotrust.org.uk](mailto:esma@dalgarnotrust.org.uk)**

#### **Call us:**

0208 969 6300.

#### **Visit us:**

9.00am - 5.00pm on weekdays

#### **Write to:**

Dalgarno Trust, 1 Webb Close, Dalgarno Way, London W10 5QB

Verification, updating or amendment of personal data will take place within 30 days of receipt of your request.

### Your data protection rights

Where the Dalgarno Trust is using your personal data based on consent, you have the right to withdraw that consent at any time. You also have the right to ask the Dalgarno Trust to stop using your personal data for direct marketing purposes. **Tell us using the details above.**

### Subject access rights

If you would like further information on your rights or wish to exercise them, please write to us [esma@dalgarnotrust.org.uk](mailto:esma@dalgarnotrust.org.uk).

You will be asked to provide the following details:

- The personal information you want to access.
- Where it is likely to be held.
- The date range of the information you wish to access

We will also need you to provide information that will help us confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

Once we have all the information necessary to respond to your request, we will provide your information to you within one month. This timeframe may be extended by up to two months if your request is particularly complex.

## What to do if you are not happy

In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO) if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at [www.ico.org.uk](http://www.ico.org.uk).

## Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This privacy policy applies solely to the personal data collected by the Dalgarno Trust.

## Keeping your information

We will only use and store your information for as long as it is required for the purposes for which it was collected. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

## How we secure your data

Information system and data security is imperative to us to ensure that we are keeping our participants, service users, volunteers, employees, and contractors safe.

We operate a robust and thorough process for assessing, managing, and protecting new and existing systems which ensures that they are up to date and secure against ever changing threats.

Our staff complete mandatory information security and data protection training on employment and annually thereafter to reinforce responsibilities and requirements set out in our information security policies.

When you trust us with your data, we will always keep your information secure to maintain your confidentiality. By utilizing strong encryption when your information is stored or in transit, we minimize the risk of unauthorized access or disclosure; when entering information on our website, you can check this by right clicking on the padlock icon in the address bar.

## Disclosing and sharing information

When we allow third parties acting on behalf of the Dalgarno Trust to access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal information for other organisations to use.

Personal data collected and processed by us may be shared with the following groups where necessary:

- Dalgarno Trust employees and volunteers
- Monitoring and market research platforms on our behalf – namely, Salesforce (internal Database Management System), WSH (NHS database), IYSS (RBKC monitoring database for Children's Commissioning Grant).
- Third party cloud hosting and IT infrastructure providers who host the website and provide IT support in respect of the website.

Also, under strictly controlled conditions:



- Service Providers providing services to us
  - Contractors
  - Advisors
  - Agents

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation; or to protect the rights, property, or safety of the Dalgarno Trust, our participants and service users, volunteers, employees, and visitors. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

## Storage of information

The Dalgarno Trust operations are based in London, and we store our data within the United Kingdom.

## In case of a Data Breach

Action in case of a breach in the security of Trust data. Calls should be made in the following order:

- Inform the Chief Executive or other senior staff member on site  
The CEO will:  
Call Police: Action Fraud
- Inform ICO of the breach within 72 hours
- Inform the Charity Commission
- Inform the regulator and funders as necessary

## Changes to this privacy policy

We will amend this privacy policy from time to time to ensure it remains up to date and reflects how and why we use your personal data and new legal requirements. Please visit our website to keep up to date with any changes. The current version will always be posted on our website.



Signed

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Esma Dukali - Chief Executive, The Dalgarno Trust

Date September 2023

Review Date September 2024