



Privacy Notice

We want young people who come to us for support, their families, our volunteers, staff, fellow professionals, supporters and donors to feel clear and confident about how any personal information you share with us will be looked after or used.

This Privacy Notice summarises how we collect, use and store your personal information (this means any information that identifies or could identify you).

This Privacy Notice may be updated in line with published regulations or changes to our service, so please check back regularly. We will let you know if we make changes via our usual communications with you.

1. Who we are

Mentoring Plus Bath & NE Somerset Ltd is committed to protecting your personal information and ensuring that your personal information is processed fairly, openly and transparently.

We are a "data controller" for the purposes of the Data Protection Act 2018 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, the personal information you share with us.

For further information about our privacy practices, please contact our Data Protection Officer by:

- Writing to us at Riverside Youth Hub, York Place, Bath BA1 6AE
- Calling us on 01225 429694

2. How we collect information about you

Our purpose is to ensure we can help vulnerable children and young people receive support and respect. We want to make sure you receive the communications that are most relevant to you, whether through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you volunteer, join us for an event, make a donation or ask to hear about our work.

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities, register with us for training or an event, make a donation to us, ask a question about mentoring, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, get in touch by mail or email, or in person.

When you choose to receive a service directly from us: When an organisation or individual refers a young person to us; when a young person (and their parent/carer if under 18) consents to mentoring; when a volunteer agrees to mentor within the guidelines of our programme; and in all cases share personal and sometimes sensitive information with us to allow us to fulfil our obligations to you.

When you interact with us through partners or professionals working on our behalf: This could be if a young person accesses an activity or service provided by a trusted supplier working on our behalf and always under our instruction.

When you interact with us through third parties: This could be if you provide a donation through a third party such as Just Giving and provide your consent for your personal information to be shared with us.

When you visit our website: We gather general information which might include the pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We use anonymous information which does not identify individual visitors to our website.

3. Information we collect and why we use it

Personal Information

Personal information we collect includes your name, date of birth, email address, postal address, telephone number and financial details (if you are making a donation, or for volunteers, have provided details to have your expenses reimbursed), as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event, or any of the other ways to interact with us.

We will mainly use this information:

- To manage our mentoring provision safely in the best interests of all young people in our care
- To process your donations, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services you have requested.
- To update you with relevant administrative messages.
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event, provide a mentoring service to a young person, or work with you as a volunteer.

We may also use your personal information:

- To contact you about our work and how you can support us.
- To invite you to participate in surveys or research.

Sensitive Personal Information

Sensitive personal information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

We collect relevant sensitive information about the children and young people in our care, both from professional referrers and from themselves and their parent/carer to allow us to provide a safe, individualised and beneficial mentoring experience, to safeguard volunteers and work in the best interests of all service users.

We collect relevant sensitive personal information from volunteers to enable us to ensure Safer Recruitment guidelines are followed, and to safeguard their own wellbeing too.

If any correspondent shares any sensitive personal information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Notice and our full Data Protection Policy.

We seek specific consents from service users and their parent/carers for the use of photography, film or audio recordings.

We will only use this information for the purposes of providing a safe, individualised mentoring experience to our children and young people.

We will not pass on your details to anyone else without your express permission except in exceptional circumstances. This might include anyone reporting issues which could represent an immediate risk of harm to themselves or others.

4. Legal basis for using your information

In some cases, we will only use your personal information where we have your consent, or because we need to use it in order to fulfil an agreed contract with you (whether or not this is a formal legal contract). The latter includes our staff, our service users, our referrers and our volunteers.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Mentoring Plus to process your information to help us to achieve our aim of inspiring our communities to help our young and most vulnerable to thrive.

Whenever we process your personal information under the 'legitimate interest' lawful basis we take into account your rights and interests and will only process your personal information if we feel that there is a balance.

Some examples of where we have a legitimate interest to process your personal information are where we use personal information for data analytics, measuring our impact, dealing with complaints, or for complying with guidance from the Charity Commission.

In addition to these legal bases, we seek specific consents for holding and processing data from our service users and volunteers to ensure they fully understand how we use their data.

5. Marketing

We will only contact you about our work and how you can support us if you have agreed for us to contact you.

You can update your choices or stop us sending you these communications at any time by replying to or clicking the 'unsubscribe' link at the bottom of the relevant communication.

6. Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers under staff supervision) to fulfil our obligations to you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

We may share information we judge to be necessary for providing a safe and reliable service with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction.

We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. An example of where we may share information is with professional activities providers who need health and risk assessment information about young people accessing those activities.

We enter into contracts with service providers that require them to comply with Data Protection regulations and ensure that they have appropriate controls in place to secure your information.

We may disclose your information if required to do so by law, for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority.

7. Keeping your information safe

We take keeping your information secure very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

We use proprietary communications tools to share service user data with statutory authorities, where relevant. Unfortunately the transmission of other information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to us.

8. How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity. For example, for supporters this may be to fulfil statutory obligations like the collection of Gift Aid.

For individuals we work with, the nature of our relationship and the contractual obligations we have to fulfil to them require keeping data for longer. For children and young people, we keep data up until their 25th birthday, which is in line with the data requirements of our local authority, Bath & NE Somerset Council, to ensure we stay accountable for the work we do, and can answer requests from people about their own data and decisions made about their care.

9. Your rights

You have rights in respect of the personal information we hold about you, summarised below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at the address above.

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for promotional purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for impact communications), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Mentoring Plus Bath & NE Somerset Ltd
A charity registered in England no. 1112534