

## **Bath Area Play Project GDPR Compliant Privacy Notice**

This Privacy Notice is as a result of the 2016 General Data Protection Regulations Articles 13 & 14

**Bath Area Play Project** are a voluntary organisation and registered charity who employ staff to provide a range of services for children, young people and families across B&NES. We also provide support and training for those working with children and young people in B&NES through advice, training and Network meetings. Our Data Protection Lead is the Director

**Information We Collect** - We obtain personal information about people, children and adults, who use our services which are essential in order to meet the needs of that person. This includes Registration and Booking Forms for services including Holiday Playschemes, Pre-school and Family Support as well as personal information from employees, volunteers and adults wishing to use our services.

**How We Use Your Personal Data** – The information we ask for helps us to care and support the children who are using the service and will only be used for the purpose of providing the service. The information we ask for from employees, volunteers and other adults which is legally required, and we will never disclose, share or sell this information without your consent, unless required to do so by law.

**The purposes and reasons for processing your personal data are detailed below:** We collect **personal data** as part of the requirements of the contract we have with you, either as a service user, employee, volunteer or Trustees who are all Data Subjects.

We process information in order that we can either care for or support children, young people and families or store your data, so we can send you information about our services. We collect and store personal data as part of our legal obligation for the paid or voluntary work you do for us and for accounting and tax purposes.

**Data Subject's Rights** – all service users have the right to access the personal information we hold which is primarily supplied by you, have any inaccurate data corrected, data portability, objecting to, or restricting how we use or process your data.

**Sharing and Disclosing Your Personal Information** – we share anonymised personal data with funders and commissioners of contracts we deliver through a secure electronic transfer. This is so they have evidence of service usage and the difference the service has for children and families. All data is stored on encrypted, password protected data processing systems which only certain staff have access to as part of our safeguarding measures. The personal data of employees, volunteers and Trustees is shared with our Accountants in order that any salary or expenses can be paid correctly.

**Dunkley's Chartered Accountants** Woodlands Grange, Woodlands Lane, Bradley Stoke, Bristol, BS32 4JY

Registered in England | Company No. 2994930 | VAT No. 927 518 209

Telephone (01454) 619900 [www.dunkleys.accountants](http://www.dunkleys.accountants)

We use Dunkley's to do our payroll, book-keeping and tax returns and they act in the capacity of a processor on our behalf. The only information we provide them with is employee / volunteers' name, address and other details to meet employment and legal requirements. This is only shared via an electronic secure file transfer system.

For more information about Dunkley's, please read their Privacy Notice at <https://www.dunkleys.accountants/privacy-statement-and-cookie-policy>

**Transfers Outside the EU** – we do not send/store any personal data outside the EU;

**Safeguarding Measures** – All access to computer systems are secured by Microsoft Azure Active Directory connected to a Microsoft Office Business account, with all users being given Azure user accounts by the administrators. All administrator accounts require two-factor authentication for every login attempt to secure against system-wide breaches. We also use ESET Security on all devices to guard against malware and hacking based attacks. Our System is also protected using ESET Security which uses FIPS 140-2 Validated 256 bit AES encryption which Safely encrypt hard drives, files and email between locations. The DE Stock Encryption includes Outlook plug-in, clipboard encryption compatible with all mail clients including webmail, file and folder encryption and encrypted

**Consequences of Not Providing Your Data**– where we do not have correct and up to date data, we may not be sufficiently aware of the care and support needs including any allergies, medical conditions or special requirements needed in order to provide the right level of care under that legal basis

**Legitimate Interests** – where we do not have consent, we can store and process data based on the legitimate interests for processing, which are being able to care and support for the service user as an integral part of the service we provide

**How Long We Keep Your Data** – Personal sensitive information will be retained for the period in law that we are legally required to keep information.

Accident Records 22 years and 8 months, Financial Records 7 years, Staff and Volunteer Records for a maximum of 8 years after they have left employment, Children / Young People's Registration Forms for one year after they have finished using the service. Child / Young Person Support Records for at least 7 years after they have finished using the service. Records for support for any child subject to a statutory plan, until their 18<sup>th</sup> Birthday. Staff / Volunteer Disciplinary Records are retained for a maximum of 2 years.

**Marketing** – we will only send information about the service that you are using or have used as this is in your legitimate interest as you use the service however, most will also have signed a registration form including your consent where you have to tick boxes to opt-in to receiving information about services & have the right to opt-out

**Lodging A Complaint** –Where you feel that we have not handled your data correctly and are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioners Office <https://ico.org.uk/concerns/> 0303 123 1113

**Source** – the original source of the personal data is provided by the child, young person, parent/carer, applicants, employees and volunteers

**Consent** – generally we collect personal data with consent and by its nature, personal information relies on consent and is an affirmative, clear action and therefore the right to withdraw consent exists.