

## Privacy Notice

### Who are we?

Oxfordshire Youth - Charity no. 1151723

Address: 4150 Chancellor Court, Oxford Business Park South, Oxford OX4 2GX

Phone number: 01865 767899

Email address: [admin@oxfordshireyouth.org](mailto:admin@oxfordshireyouth.org)

Data Protection Lead: Pippa Trench, Research and Impact Manager

Oxfordshire Youth is a boundary-breaking, youth development charity, passionate about creating a future for and with young people aged 11-25 that gives them the best possible opportunity to realise their potential.

### Oxfordshire Youth's commitment

We are committed to protecting and respecting your privacy. This privacy notice explains when and why we collect personal data about you, how the information is used, the conditions under which it may be disclosed to others and how it's kept secure.

We may review and update this privacy notice and will update you when any amendments are made. If you have any questions regarding this privacy notice and our privacy practices, you can contact [admin@oxfordshireyouth.org](mailto:admin@oxfordshireyouth.org).

We are committed to these principles of data protection:

- **lawfulness, fairness and transparency** we process data lawfully, fairly and in a transparent manner
- **purpose limitation** we use personal data for specific, explicit and legitimate purposes. We don't further process data in a manner that is incompatible with those purposes
- **data minimisation** we are committed to only processing data that is adequate, relevant and limited to what is necessary **accuracy** personal data is kept accurate and kept up-to-date
- **storage limitation** we are committed to storing personal data for no longer than necessary
- **integrity and confidentiality** we process data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- **Secure handling** we ensure that appropriate technical and physical security measures are in place to prevent unauthorised access to personal data
- **We maintain records of our processing activities** to ensure we can be held accountable for the way we handle data

- **Data retention** we ensure we retain personal data only for the period necessary for the purpose we have identified.

### The type of information we collect

Oxfordshire Youth may collect personal information from different groups of data subjects:

- young people
- volunteers
- job applicants
- web and social media data subjects
- attendees of Oxfordshire Youth events
- freelancers
- donors
- employees
- trustees

Personal information may include:

- records of correspondence
- identifiers such as ethnicity, sexual history, behavioral records, demographics, medical and health history
- knowledge and beliefs, authenticating, preference
- historical (life history)
- financial (account records, transactions)
- social (professional, criminal, public life, family, communication)
- special categories of data (e.g race, ethnicity, data concerning health, sexual orientation)

Depending on your relationship with us, we collect different personal information. Here are some examples:

If you are a **young person** taking part in one of our programmes, we may collect information such as name, date of birth, contacts, emergency contacts and special categories of data

If you are an employee, we may collect information such as bank accounts, professional and educational background, and special categories of data

If you are a trustee or volunteer, we may collect information such as contacts, emergency contact, DBS information

If you are donating to us, we may collect information such as identifiers and contacts

If you are attending one of our events, we may collect information such as your email address, postcode, interests.

If you are visiting our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to various parts of the website. The information is only processed in a way which does not identify anyone. To opt-out of being tracked by Google Analytics across all websites visit

<http://tools.google.com/dlpage/gaoptout>.

### **How do we collect information about you?**

Most of the personal information we process is provided to us directly by you, via completed transactions, completion of forms, letters, emails or verbally. However, if you are a young person involved in one of our programs, we may collect information from third parties. Local authorities, professionals, schools and other charities may refer you into a programme via a referral form or may help us evaluate the outcomes of a program by providing us with regular updates involving your personal information.

### **Why do we collect information about you?**

We need to collect information to fulfil the following needs:

- to carry out our work, meet our objectives and comply with the contractual obligations placed on us by our funders
- to help us fulfil any requests that you make (e.g. job application, donation, participation to an event or a programme), to best meet your needs and to deliver the best services that we can
- to keep track of the impact of our work
- to record the services that you've used
- to record any contact that we might have with you
- to send you information that we think will interest you
- to carry out evaluation, monitoring and analysis of the demographics and achievements of our beneficiaries so that we can get a better understanding of what works for them and continually 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.

### **Lawful basis**

Oxfordshire Youth processes personal data by identifying a 'lawful basis':

- with consent of the data subject - in conjunction with the Data Protection Act (2018), we can gather consent directly from minors if they are 13 years old or older. If we support a young person under 13, parent/carer consent may be required
- for a contract involving the data subject
- to meet a legal obligation
- to protect any personal vital interests
- in our legitimate interests provided that your interests are respected.

### **Data sharing**

We may share personal information with external organisations. This may be done based on

legitimate interest, contractual or legal obligation. For example, if you are a young person taking part in one of our programmes, we may share some information with a delivery partner. Whereas, if you are an employee, we have a legal obligation to disclose information to HMRC and contractual obligations to share key HR information to the insurance provider and to the pension service.

If there's no legitimate interest, contractual or legal obligation to share your data, we'll share your personal information only if we identify the need to do so and only with your written and explicit consent.

### **How long we hold your information for 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 and/ 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.

When we are provided with personal information about you, steps are taken to ensure that it is treated securely. All information we collect about you is stored securely in the head offices in locked cabinets, the keys for which are also stored securely in a locked cabinet. Electronic data is stored on a secure server and is accessed via password-protected computers that are used only by our staff members.

Any personal information that is shared with third parties will be communicated via secure email systems. We have put appropriate systems in place to enable third parties to communicate information securely, and third parties are provided with information regarding how to do so. We cannot, therefore, be held accountable for the security of any personal information sent from a third party that is not sent via secure arrangements. Whilst we make every effort to protect your personal information we cannot guarantee the security of any information you transmit to third parties, and you do this at your own risk. When we receive information about you, best efforts are made to ensure its security on our systems.

We may retain personal data outside of the UK using various electronic means including but not limited to our CRM and cloud storage. We are required to assess the risk of such transfers of data in accordance with the UK data transfer regime. This includes undertaking a transfer risk assessment and establishing appropriate safeguards such as the UK addendum or the international data transfer agreement.

### **Data breaches**

In case of a data breach, we take immediate steps in order to ensure that the breach is not still occurring and to reduce the impact of the breach. If the data breach is likely to result in a high risk to your rights and freedom (e.g. where the breach could result in ID theft or fraud; physical harm; significant humiliation and/or damage to reputation), we will inform you without undue delay and you'll be informed on how you can log a formal complaint to the Information Commissioner's Office (ICO) if you wish to do so.

## **Cookies**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Unless you have set your browser to block cookies, this site will place the following cookies on your computer.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Data subject's rights**

You are not required to pay any charge for exercising your rights. If you make a request, we may have one month to respond to you. Please contact [admin@oxfordshireyouth.org](mailto:admin@oxfordshireyouth.org) if you wish to make a request.

### **How you can update your information**

The accuracy of your information is important to us. If any of your contact details change, or if you believe that any of the information we hold about you is inaccurate or out of date then please contact [admin@oxfordshireyouth.org](mailto:admin@oxfordshireyouth.org) in order to update your information or highlight any inaccuracies.

### **How you can access your information**

You have the right to access your personal data that we hold about you. Such requests will be handled in accordance with the guidance of the Information Commissioner's Office.

### **The right to have your personal information erased**

You have the 'right to be forgotten'. This enables you to request the deletion or removal of personal data where there is no ongoing reason for its continued processing. All requests for erasure will be fully considered and responded to by the Senior Leadership Team.

### **The right to object to the processing of your personal data**

You have the right to object to the processing of your personal data even when the processing of data is based on 'legitimate interest'. To do so you must have 'grounds relating to your own particular situation'. All objections to processing should be made by stating very clearly what your grounds for objection are. All objections will be fully considered and responded to by the Senior Leadership Team.

### **The right to withdraw consent**

If we choose consent as the lawful basis for the processing of your personal data, you have the right to withdraw your consent at any point.

### **The right to restrict processing**

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

### **The right to data portability**

You have the right to ask us to transfer the personal information you gave to us to another organisation, or to you, in certain circumstances.

### **The right not to receive direct marketing**

You have the right not to receive direct marketing if that is your choice.

### **Complaint procedure**

You have the right to complain about the way Oxfordshire Youth processes your personal data. For further details about this please go to the Regulator of Information rights in the UK, the Information Commissioner's Office website here:

<https://ico.org.uk/make-a-complaint/>. If you reside outside of the UK, you may need to speak to the relevant regulator in that country.

If you wish to make a complaint directly to Oxfordshire Youth, please email:

[chair@oxfordshireyouth.org](mailto:chair@oxfordshireyouth.org) – this is only accessed by Oxfordshire Youth's Chair of Trustees who will act accordingly – you will receive a response within five working days and complaints should be resolved within 28 days. You can remain anonymous if you wish.

### **Young people and privacy notices**

Considering we work on different programs for our young people and we process specific type of personal data, we have identified the need to create specific privacy notices to better inform those young people who are involved in specific programs that we run:

- privacy notice for young people engaged in Youth Voice Network (accessible version also available)
- privacy notice for young people engaged in the Chances Programme (accessible version also available)
- privacy notice for young people engaged in the Compass Partnership (accessible version also available)
- privacy notice for young people engaged in the Young People's Supported Accommodation (accessible version also available)

### **Privacy notice review**

This privacy notice is kept under regular review. This privacy notice was last updated in December 2022.