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**General Data Protection Regulation (GDPR) Privacy Notice**

This Privacy Notice tells you what to expect when Hessle Road Network collects and uses your personal and sensitive information when you use our services, the lawful basis as to why we collect and use your information, and your rights under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We will at all times process your personal data lawfully in accordance with the GDPR and Data Protection Act 2018. We take the security of your personal data very seriously and have internal policies and controls in place to ensure that your data is stored securely on a database and in paper files in a locked office, and to make sure it is not lost, accidentally destroyed, misused or disclosed, and is accessed by only those authorised and trained to do so. If you have any questions about our practices, please contact us

**Personal Data** means any information relating to a person ('data subject’) which would enable their identity to be identified, directly or indirectly. In particular it covers information such as as a name, address, an online identifier, or one or more factors specific to the medical, mental, economic, cultural or social identity of a person, which taken together could allow the person to be identified.

**Sensitive Personal Data** relates to bank account details, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition, data concerning a person's sex life or sexual orientation, the commission or alleged commission of any offence, and any proceedings for any such alleged or committed offence, the disposal of such proceedings or the sentence of any court on such proceedings.

It is important that the information contained in our records is both accurate and current. If your personal data happens to change, please keep us informed of such changes.

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| **Data Controller** | Hessle Road Network |
| **Our Contact Details** | 1 Massey Street, Hull, HU3 3LA.  Telephone: (01482) 606077  Email: [info@hesslerdnetwork.karoo.co.uk](mailto:info@hesslerdnetwork.karoo.co.uk) |
| **What personal data do we collect?** | We collect data through the completion of registration forms, consent forms, signing in sheets, outcome star assessments, survey questionnaires, enquiry forms on our website, and through conversations/meetings with young people.  We collect personal data on service users name, address, date of birth, age, telephone numbers, school/training provider, gender and emergency contact details (name, address, telephone numbers and relationship to service user) on registration and consent forms.  We collect sensitive personal data on disability, ethnicity and medical condition through registration and consent forms.  Through conversations/meetings with young people we collect sensitive personal data on medical and safeguarding issues. |
| **Purpose for processing your personal data.** | To provide services and activities for our service users (young people aged 9-25 and members of the wider community across all ages predominately from the West Hull locality) covering: evening youth clubs; school holiday activities; Play Rangers, outreach and detached work; community projects including drop ins, walking group, employability programmes, adult education sessions and young parents group; programmes around domestic abuse awareness; distribution of food parcels/affordable food; volunteering/student/work placements; sports projects including the community gym; events such as pantomimes and talent shows; specific issue-based sessions; intensive 1-2-1 support.  For safeguarding of people using our services and activities.  For health and safety and insurance reasons we collect emergency contact details and medical information of people using our services and activities.  To promote our organisation and our activities and services, we take photographs, audio and film recordings to use on social media, TV, radio and in the press.  To carry our surveys and questionnaires to find out how our services are viewed by our young people, other service users and parents/legal guardians.  To monitor take up of our services and activities to help us reach out to people not using them.  To monitor the outcomes of our activities against our contractual obligations with funders. |
| **Will we use your personal information for other purposes?** | We will not process your personal data for any other purpose than that for which it was collected, without first providing you with information on that other purpose and seeking your consent if applicable, except where we are required to disclose your personal data in accordance with legislation for example in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect the interests of you or another. |
| **The legal basis we have for processing your personal data.** | **We process your data under the following articles of the GDPR.**  **Article 6 (a) Consent**: the data subject has given consent for you to the processing of their personal data for one or more specific purposes.  When accessing our services, you or your parent/legal guardian need to complete a registration and consent form to collect and store your personal data and consent for it to be shared with our funders, we will only share this data with your consent. You also consent to us taking photographs and audio recordings for publicity purposes. The only time we would share your personal data without your consent is if there was a concern you or someone else was at risk of harm, of which we would always inform you. We are required to do this by law.  **Article 6 (b) Contract**: processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract.  Various services at Hessle Road Network are funded under contract by external organisations such as Hull City Council and Humber Learning Consortium. Personal information is supplied to these bodies as part of our contracts, and as statistical monitoring information.  **Article 6 (e) Legitimate interests**: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.  We act as a Data Processor on behalf of Kingston Upon Hull City Council who are the Data Controller for our Targeted Early Health Youth provision contract and the Head Start Play Rangers Service as well as Humber Learning Consortium who are the Data Controller for our Employability Programmes and we share personal and sensitive data with them.  You can read their privacy notices on their websites.  Hull City Council  <http://www.hull.gov.uk/help/privacy-notices/privacy-notice-–-targeted-youth-support>  Humber Learning Consortium <https://www.hlc-vol.org/about-us/gdpr/>  Your sensitive personal data is processed under Article 9 (c) of the GDPR because it is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent. This is to safeguard your health and safety and to prevent harm to you. |
| **Am I required to provide you with my personal data?** | No. But to use our services and take part in our activities you must complete a registration and consent form and sign into sessions for insurance, health and safety and contractual reasons. If you do not you cannot use our services. |
| **Does your processing of my personal data involve automated decision-making, including profiling?** | No. |
| **Who do you share my personal data with?** | We act as a Data Processor on behalf of Kingston Upon Hull City Council who are the Data Controller for our Targeted Early Health Youth provision contract and the Head Start Play Rangers Service as well as Humber Learning Consortium who are the Data Controller for our Employability Programmes and we share personal and sensitive data with them.  We also share monitoring data with our Board of Directors and funders including The Sir James Reckitt Charity, Marsh Christian Trust, The National Lottery, NHS CCG, The Henry Smith Charity, The Brelms Trust and Lloyds Bank Foundation this data is anonymised meaning you cannot be identified. This is for the following reasons:   * To be paid for the services we provide * To ensure we meet local needs and provide accessible services * To inform service development and produce local statistics.   We will respect your confidentiality as much as possible. But we will share your information if we feel that you are at risk of harm. Depending on the circumstances and the level of risk, this could be one or more of the following: our Directors, your school/training provider, your parents/legal guardian, your doctor, hospital, Hull City Council Adult and Children Social Care and Humberside Police. |
| **Do you transfer my personal data to a country or territory outside the UK.** | No transfers outside of the UK. |
| **How long do you retain my personal data for?** | We will keep your personal data whilst you continue to use our services for as long as is necessary to fulfil the purposes we collected it for. In general, we will not keep your personal information for longer than seven years after you last use our services before we securely delete it. We keep it this long for insurance, health and safety and safeguarding reasons. This applies to information collected on registration and consent forms, signing in sheets, questionnaires, monitoring information, safeguarding information and young people files/logs.  Photographs/video and audio recordings are held indefinitely but after seven years since you last use our services are anonymised. |
| **What are my rights in relation to my personal data?** | You have:  a) The right to know what information is held about you and to request a copy of this.  b) The right to have your data corrected or completed, if there are mistakes or gaps in it.  c) The right to have your data deleted, unless there is a legal reason to retain it.  d) The right to object on personal grounds to how we use your data, and to ask us to show that this use is legally justified.  e) The right to have the use of your data restricted, for example while you challenge its accuracy, or while you object to our use of your data.  f) The right to be told who we have shared your data with and for what purpose.  g) The right to have your data in a standard format, and to send it to someone else.  i) The right to complain to the Information Commissioners Office.  These rights may be subject to exceptions that would need to be considered on a case by case basis, for example we cannot delete data that we are required to keep by law, and we could not share data with you if it would expose data about another person without their permission.  For further details of your rights, please the sheet ‘Your rights as a Data Subject under GDPR’ on our website or available on request.  To exercise you rights you must formally write to our Data Controller and we will reply within one month of receipt of your request. We will be required to verify your identity before supplying your personal data. No fee will be charged to access your data, although a reasonable administration fee will be charged if the request is unfounded, excessive or repetitive |
| **Who can I complain to?** | If you are dissatisfied with how we have processed your personal data you can contact our Data Controller to request an Internal Review (Information Complaint).  If you are dissatisfied with the outcome of the internal review, you have the right to appeal directly to the Information Commissioner for an independent review. <https://ico.org.uk/concerns/> |
| **Contact details for our Data Controller.** | Julie Robinson, Chief Officer, Hessle Road Network,  1 Massey Street, Hull, HU3 3LA.  Telephone: (01482) 606077  Email: [info@hesslerdnetwork.karoo.co.uk](mailto:info@hesslerdnetwork.karoo.co.uk) |

Hessle Road Network is registered in England and Wales as a Company Limited by Guarantee (No 04360117) and a Registered Charity (No 1097519).

September 2019