



Policy Title	Ely Centre Data Protection and Privacy Policy
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The Ely Centre Privacy & Data Protection Policy

Introduction

The Ely Centre is a Northern Ireland based Charity. Our mission is to provide multi-disciplinary support services for civilians, security force personnel and their families, who have experienced bereavement and injury as a result of the “Troubles” through evidenced based treatment, prevention and support services that address issues of declining physical and psychological health, social and financial difficulties which have arisen as a result of the “Troubles”

The Ely Centre values everyone who engages with us by whatever means, and we do all we can to protect your privacy and to make sure the personal data you provide us is kept safe.

The data that we do hold is relative to your relationship with us. It will only include personal information if you have voluntarily provided that to us (for instance, a contact method such as home address, phone number and/or email).

By visiting our website, using our services or participating in our activities, you agree to your personal information being collected and used in the manner set out in this Privacy Notice as updated from time to time.

This policy explains how we collect data, how we use and store information and what it means for you. We also have **specific Terms and Conditions for the use of our website, which you should read as well.**

The EEC have implemented the GDPR regulations which will come into effect in the UK from 25 May 18, the regulations strengthen the existing laws covered by the UK Data Protection Act, but it puts a legal obligation on for the processing, holding of data. This new regulation will supersede previous data protection and privacy policies of the Ely Centre.

We treat all our clients in line with our values and we welcome any feedback on any of our actions.

Please contact the Data Protection Officer on 02866320977 or email info@elycentre.co.uk

This Policy explains the privacy and the data protection practices in connection with:

- The Ely Centre
- What personal information is collected
- How we use your information
- What information we disclose to other parties
- For our beneficiaries
- How you are in control
- Where we store your data and steps taken to ensure its security.
- Online security
- Links to other websites
- AX1 : GDPR Explained

Who we are

The Ely Centre are a charity registered in Northern Ireland (number NIC101144). Our company number is ni43785 and our registered office is at 60 Forthill Street, Enniskillen, Co Fermanagh, BT74 6AJ

For the purposes of this Policy, 'us', 'we' and 'our' refer to The Ely Centre.

What information do we collect?

Directly with us

We collect personal information each time you deal with us, For example when you make a referral /donation, sign up for an event or service , provide comments, complete surveys or otherwise provide your personal details we collect the information you provide. This may be anonymised to increase your personal privacy.

From website interaction with us

We may collect non-personal data such as IP addresses, details of pages visited and files downloaded. Website usage information is collected using cookies.

Indirectly from 3rd parties

We collect information from 3rd parties such as event organisers or fundraising sites like Just Giving or eg. SSAFA, you have agreed to support Ely Centre Projects or Campaigns and have given your consent. You may wish to check their privacy policy to find out more information on how they will process your data.

Where you give your permission to other organisations

We may collect information that you make available on, for example, Twitter, Facebook, LinkedIn or similar organisations. You may wish to check their privacy policy to find out more information on how they will process your data.

From publicly available data

We may collect information from Companies House, Charity Commission and information published in articles, newspapers or blogs.

Sensitive data

Where you provide the information, we may collect sensitive personal data, including, but not limited to, your religious beliefs, age, date of birth, your physical or mental health, incidents pertaining to the Northern Ireland Troubles, your previous military/security force history.

IF you have any requests concerning your personal information or our practices,
please contact our Data Protection Officer

Data Protection Officer

The Ely Centre

52 Forthill Street

Enniskillen

Co Fermanagh

BT74 6AJ or email to: info@elycentre.co.uk

What do we do with it?

Processing of requests / donations / calls to action

We may use the personal data we collect to:

- Keep you up to date on news, events and stories about our work;
- Onward referral with your consent to appropriate referral agencies.
- Help deal with your enquiry, request or application
- Process your purchase or a donation
- Provide further information about our causes, work, activities or products
- Seek your ideas and feedback, via research or surveys
- Analyse and improve our work and services
- Aid fraud prevention
- Provide a more personalised service
- Provide it to a professional body if required by law or to comply with a legal process to register you with our web site and to administer our web site services for assessment and analysis
- Notify you about changes to our Services
- Ask for financial and non-financial support, such as volunteering/befriending
- Process donations you give us, or to support your fundraising for us, including gift aid;
- Provide information or packs, for example service referral welcome packs you have requested;
- Keep records of your relationship with us e.g. questions you have asked or complaints you have made;
- Analyse the personal information we collect about you and use publicly available information to aid our understanding of our clients, understand the level of potential service users, profile clients into categories and to help provide the right information at the right time to the right service users; and
- Conduct market research to aid our understanding of our beneficiaries and their views.

We may use publicly available information such as newspaper articles, or information you have given permission to other organisations to share such as LinkedIn, to identify supporters and non supporters, including trustees, who have expressed an interest in having a public profile with charities like The Ely Centre

If you make a major gift to our work, and where you agree to such a relationship with us, you will be given a relationship manager who will discuss and agree with you any sensitivities you may have about the personal data we hold and the

methods of contact suitable for you. We will do this at the earliest convenient opportunity. Where you do not wish to pursue such a relationship with us, we will not retain any additional publicly sourced personal data about you we have used for this purpose.

Basis of processing your data

• **Consent** : If you are a new supporter coming on board for the first time, on or after 20th April 2018 we will process your personal data on the basis of the consent you provided us with. When registering with the organisation you will be required to complete a consent form along with your registration form. You are free to change your preferences at any time by contacting us by telephone, post or email.

• **Legitimate interest : Contacting you;** If you are an existing service user as at 20th April or join the organisation after the 20th April we may continue to contact you by email where you have previously given us your consent. We may also contact you by post or telephone where we have a legitimate interest to do so. For example, where you have previously required service support, we may continue to send you information about services/events you have expressed an interest in. Where you have previously asked us not to contact you in this way we will continue to respect your contact preferences. You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email

Applying for a job or volunteering (befriending) with us

Where you provide personal data and sensitive personal data when applying for a job with us, such as the information on your application form / CV we will process, store and disclose the personal **data we collect to:**

- Support the recruitment process;
- Enable you to submit your CV, apply online for jobs and to subscribe for alerts about job types of interest to you;
- Answer any questions you may have;
- Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

Where you provide personal or sensitive personal data, such as dietary, mobility requirements or health information, to volunteer or travel on a trip with us we will store, process and disclose the personal information we collect to:

- Deliver the volunteering opportunity, including the disclosure of sensitive data, such as medical information, to our partner(s) where necessary to deliver a safe trip or event for all involved;
- Provide information including fundraising materials or equivalent of the volunteer role description;
- Provide the administration of events or opportunities to serve;
- Monitor the quality of the volunteering opportunity or trip provided;
- Answer any questions or feedback you may have;
- Provide anonymised data to monitor compliance with our equal opportunities policy

How and where we store your information

How long?

We will keep your personal information only for as long as we consider it necessary to carry out each activity.

We have a data retention and destruction policy to implement this. We take account of legal and funding authority obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

For example we will retain details of donations/ funding for 7 years to meet tax and accounting requirements, but we will only hold sensitive medical personal information provided to participate in an overseas trip until the trip is completed.

If you have any questions about our Data Retention & Destruction Policy please contact us in writing at

Data Protection Officer

The Ely Centre

52 Forthill Street

Enniskillen

Co Fermanagh

BT74 6AJ

Or email to: info@elycentre.co.uk

Security

We ensure that we have in place appropriate technical controls in place to protect any personal data you provide. For example, we ensure that our computers are encrypted and our network is protected and routinely monitored.

We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

Where we store your personal information

We follow the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information. We make every effort to securely store any data. All data is kept within the EU and our storage of it adheres to the EU Data Protection Directive 95/46/EC.

All information you provide to us is stored in a number of ways

- 1: Cloud based systems
- 2: Encrypted password controlled computers
- 3: Server based systems administered by funding authorities and are fully compliant with GDPR
- 4: All hard copy material and computer hardware are secured within offices with Key Coded Entries and lockable storage cabinets.
- 5: Within the centre all staff operate a clear desk policy and no personal data is left on office desks during office closure times.
6. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Organisational Systems.

The Ely Centre complete an audit of what data we hold and who has ownership of it within the various business areas ie Financial, General Membership, Health and Well Being, Welfare and social support.

The Ely Centre review our risk register and conduct a risk analysis on an annual basis or as and when required.

The Ely Centre have appointed a data controller.

The Ely Centre provide internal training to staff in data processing and opportunities to refresh this training when available.

The Ely Centre review on an annual basis our data protection and privacy polices to reflect changes in legislation or as and when required.

All Directors/staff and volunteers are briefed them on the regulations surrounding data protection and steps to ensure privacy and how to assist in the information audits.

When we share your information

In line with our beliefs, we do not share/sell or swap your information with any other charities.

Legal duty

We may need to pass on information if required by law, company policy or by a regulatory body. For example, service beneficiary numbers /case queries or in exceptional circumstances such as harm to yourself or other, serious criminality or protection of a child, young person or vulnerable adult we may consider passing on your information without obtaining consent. risk to yourself or another, or if asked for details by a law enforcement agency.

Our service providers and third parties (counselling team)

The Ely Centre employ sessional therapists to carry out expert roles in mental health on our behalf to achieve our goals. The sessional team of Mental Health Therapists are bound by Regulatory Bodies such as BACP/IACP/UKCP or similar and are responsible for their actions. Their responsibility for protecting the information you provide is outlined within The Ely Centre Psychological Practitioner Manual and their Regulatory Authority Ethical Guidelines.

We may provide third parties with general information about users of our service, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

How we treat children and vulnerable persons

Aged 16 or under

We do not actively seek to collect children's data, and are most likely to do so when children are travelling on a trip with their parents' or guardian. If at any time we create any materials which may lead to someone aged 16 or under providing their details, we make it clear that they should make sure that they have your parent's /guardian's permission first, before giving us their personal information.

Vulnerable Adults and Beneficiaries in vulnerable circumstances

We recognise the importance of identifying and supporting beneficiaries in vulnerable circumstances. Staff who send or respond to member emails, mailings or calls are trained to be aware of, to identify signs of vulnerable circumstances and to deal with the client appropriately in accordance with our vulnerable adults and circumstances policy and referral pathways policy.

Personal information will be recorded so that we may respond more effectively and appropriately in future.

Your choices and telling us when things change

Preferences

You can change your preferences on what you receive from us, including marketing events, services or how we contact you, by mail, phone or email, at any time.

You can do so by:

Calling us on: 02866320977

Email us on: info@elycentre.co.uk

Write to us at:

The Ely Centre

52 & 60 Forthill Street,

Enniskillen

Co Fermanagh

BT746AJ

Updating your details

We do appreciate it if you keep your details up to date. You can do so by completing our service referral form or in the same way as updating your preferences (above).

We may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form.

We will not use these sources to create data that you have chosen not to provide, for example, if you have left a telephone number blank; nor will we automatically update changes of address, we will normally only update your address when you tell us it's changed. However, if you are a regular service user given we may use external sources to update your address details so that we may update you on current services which are in line with your preferences or expressed needs.

Telling us to stop processing

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at:

Data Processing Officer
The Ely Centre
52 Forthill Street
Enniskillen
Co Fermanagh
BT74 6AJ
Or email to: info@elycentre.co.uk

Access to your information

Your rights under DPA 1998 & GDPR 2018

You have the right to request details of the information we hold about you. To receive a copy of the personal information we hold please write to our Data Protection Officer. We will respond within 30 days of receiving your letter. We may process a charge for requests if deemed excessive. Furthermore, we may refuse a request and if so, we will provide a written explanation for this outcome.

For more information about your rights under the Data Protection Act you can visit the website of the Information Commissioner's Office.

Changes to the Ely Centre Privacy & Security Policy

Changes to this Policy

This policy was last updated in April 2018. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy we will show this clearly on our website, or in our publications or by writing to you directly. By continuing to use our website you will be deemed to have accepted these changes.

ANNEX 1 : GDPR

Who does the GDPR apply to?

- The GDPR applies to ‘controllers’ and ‘processors’.
- A controller determines the purposes and means of processing personal data.
- A processor is responsible for processing personal data on behalf of a controller.
- If you are a processor, the GDPR places **specific legal obligations on you**; for example, **you are required to maintain records of personal data and processing activities. You will have legal liability if you are responsible for a breach.**
- However, if you are a controller, you are not relieved of your obligations where a processor is involved – the GDPR places further obligations on you to ensure your contracts with processors comply with the GDPR.
- The GDPR applies to processing carried out by organisations operating within the EU. It also applies to organisations outside the EU that offer goods or services to individuals in the EU.
- The GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household activities.

What information does the GDPR apply to?

- Personal data

The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Personal data that has been pseudonymised – eg key-coded – can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

- Sensitive personal data

The GDPR refers to sensitive personal data as “special categories of personal data”

The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual.

Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing. In summary data has to be:

“a) processed lawfully, fairly and in a transparent manner in relation to individuals;

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Processing Data at a glance

- You must have a valid lawful basis in order to process personal data.
- There are six available lawful bases for processing. No single basis is ‘better’ or more important than the others – which basis is most appropriate to use will depend on your purpose and relationship with the individual.

- Most lawful bases require that processing is 'necessary'. If you can reasonably achieve the same purpose without the processing, you won't have a lawful basis.
- You must determine your lawful basis before you begin processing, and you should document it. Take care to get it right first time - you should not swap to a different lawful basis at a later date without good reason.
- Your privacy notice should include your lawful basis for processing as well as the purposes of the processing.
- If your purposes change, you may be able to continue processing under the original lawful basis if your new purpose is compatible with your initial purpose (unless your original lawful basis was consent).
- If you are processing special category data you need to identify both a lawful basis for general processing and an additional condition for processing this type of data.
- If you are processing criminal conviction data or data about offences you need to identify both a lawful basis for general processing and an additional condition for processing this type of data.