



## Inspiring Communities Together Privacy Policy October 2021

### Review dates:

Date of review	Amendments/Updates made	Reviewed & accepted	Proposed next review
May 2018	Policy adopted		May 2020
October 2021	Policy review		
November 2021	Policy reviewed and updated		November 2023
December 2023	Updated AFS website		December 2025

### Introduction

This Policy explains when and why we collect personal information about people who use our services and visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure. It explains an individual's data protection rights and how to make a complaint. Any questions about this policy can be made using the contact details at the end of this policy.

### Who are we?

Inspiring Communities Together is a local community anchor organisation working with local communities across Salford and particularly in Charlestown, Lower Kersal and Seedley, Langworthy and Weaste. We provide early years, learning and training, neighbourhood based work, activities for older people all with the aim of promoting individual health and well being and healthy and thriving neighbourhoods.

### What type of personal data does ICT collect?

The personal information we currently collect from individuals includes:

- Contact details – name, address, telephone number, email address
- Computer IP address when you access our website

### Who do we collect personal information about?

We need to collect and use personal data if an individual contacts us for any reason, including:

- Beginning or requesting to be a member of Inspiring Communities Together
- Attending our community activities
- Accessing our programme of activities
- Employees or prospective employees of Inspiring Communities Together
- Volunteering or prospective volunteering with Inspiring Communities Together



## How do we collect personal information?

Most of the personal information we process is collected directly from individuals, when filling out electronic or paper forms, over the telephone, by e mail, writing to Inspiring Communities Together, or contacting Inspiring Communities Together on social media.

Sometimes we may collect personal data indirectly, from a third party, for example a funder or a partner organisation who makes a referral to one of our programs of work.

## How is personal information used?

We may use personal information to:

- process an application for membership
- Update about local activities you have told us you are interested in, if you have given us permission to do this.
- provide you with Yogurt Pots childcare services
- provide you with Age Friendly Salford services
- provide you with social prescribing (community connector) services
- provide you with information or advice services
- provide you with training / learning services
- respond to your enquiry or request for information
- keep a record of any contact we have with you
- process sales or donations and verify financial transactions
- send you our email bulletins
- to carry out our obligations arising from any contracts entered into by you and us
- seek your views or comments on the services we provide
- notify you of changes to our service
- process applications for jobs, internships, apprenticeships and placements (where applicable see also privacy notice for staff and volunteers)
- prevent or detect fraud
- provide a personalised service to you when you visit our websites. This includes the use of cookies if you agree to their use. This could include customising the content and / or layout of our pages for individual users.
- To carry out research on the demographics, background and interest of users of our service, our partners and stakeholders. This is to get a better understanding of you and to improve our services.
- Communicate with you as a user of our programmes of work, partner or stakeholder.

## Who do we share your information with?

We may share your information with other people and organisations where we are required to do so by law or with appropriate justification under the Data Protection Act (2018). Examples of this include the sharing of employee data with HMRC regarding payroll functions or where we have a duty of care such as a safeguarding concern.

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.



### **Third Party Service Providers working on our behalf:**

We may occasionally work with 'third party service providers', agents or subcontractors who may provide services on our behalf (for example to evaluate and improve the quality of our work). However, if and when we use third party service providers, we only disclose the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. We will not release your information to third parties for any other reason unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you use our secure card payment facilities, these transactions are processed by a third party payment processor 'Sum up' who specialise in the secure online processing of credit and debit card payments. SumUp is certified as compliant under the Payment Card Industry Data Security Standard (PCI-DSS). If you have any questions regarding secure transactions please ask us.

Inspiring Communities Together may at times deliver our program of work under contract (for example to Salford City Council) If for any reason any of our contracts were transferred to another provider we will take steps to ensure that your privacy rights continue to be protected and we will inform you of our plans in line with this policy.

### **Lawful Processing**

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- We have a contractual obligation.
- We have a legal obligation as an employer.
- To protect your vital interests or those of another person.
- The performance of our public task.
- We have a legitimate interest.

### **Special category data**

Inspiring Communities Together may process special category data (sensitive data), for example details about your health or ethnic origin. We will only do this when it is necessary for delivery of the programme of work and when we can show we have an additional basis for processing this data under the UK GDPR. This information can be found in the individual project privacy notices or in our staff or volunteers privacy notice. In the vast majority of cases Inspiring Communities Together collects such data from you separately and on an anonymous basis. This is so we can improve our work and measure our impact and does not identify you.

### **How do we store your information?**

Your personal information will be stored securely. It may be stored in different places within Inspiring Communities Together, including in our core IT systems, in our HR Management system and accounting / finance package. All of our systems are secure cloud based with appropriate access controls and individual user password protection.



## How do we keep your information safe?

We take our obligations to look after your data very seriously and abide by the principles of data protection. We have put in place appropriate technical and organisational measures to meet the requirements of accountability. These include:

- The appointment of a data protection lead who reports directly to the Board of Trustees
- Taking a 'data protection by design' approach to our activities. This means thinking about data protection at the very beginning of our planning and throughout our work.
- Keeping records of our processing activities.
- Adopting and implementing data protection policies and ensuring we have written contracts in place with our data processors.
- Implementing appropriate security measures in relation to the personal data we process.
- Carrying out data protection impact assessments for our high risk processing.
- Making sure staff that can see your information have undergone specific training around how to handle information properly
- Relevant paper based information is processed only by the relevant members of the Inspiring Communities Together team and kept securely, in locked filing cabinets, within our Salford registered office and at Yoghurt Pots Childcare facility.
- Our electronic systems and physical storage have appropriate access controls applied. This means that only team members will have access to information on a need to know basis. If a team member is not the appropriate person they will not be able to see your information.
- Electronic information is processed within our secure network and systems.
- Any sensitive information (such as credit or debit card details) is encrypted and protected by the third party companies we use, for example Sum Up. Inspiring Communities Together do not see or hold your credit / debit card details.
- The systems we use to process personal data allow us to erase or update personal data at any point in time where appropriate.

We strive to protect your personal information, whether provided digitally or in paper format, however we cannot guarantee the security of how you transmit this information to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. For further information please read our Data Protection policy, Complaints Procedures and Confidentiality policy.

## Your choices

You have a choice about whether or not you wish to receive information from us. If you want to receive direct marketing communications from us about our program of work, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will contact you for marketing purposes by post if you have indicated that you wish to be contacted. You can change your marketing preferences at any time by contacting us by email at: [office@inspiringcommunitiestogether.co.uk](mailto:office@inspiringcommunitiestogether.co.uk) or telephone on 0161 743 3625.



## Note on email marketing

Emails and text messages are also covered by the Privacy and Electronic Communications Regulations. Every time your email address is recorded, you will be offered email updates about our work programmes. You will have to tick a box to agree to your details being used for these marketing emails.

Also, any marketing emails sent by Inspiring Communities Together will include the opportunity to unsubscribe from future emails.

## How long will you hold onto my information?

Information has to be kept for different lengths of time that is often dictated either by law or funding terms and conditions. Where this is not the case we use recommendations from legal advisors and industry best practice to make a decision based around our business needs. Full details are in our retention policy. This is available on request from Inspiring Communities Together.

## Transfer of data outside of the European Union

Inspiring Communities Together database is hosted in the UK and our IT support contract is provided by a UK based organisation.

We don't routinely transfer personal data overseas but when this is necessary, we ensure that we have appropriate safeguards in place.

## Our website

ICT currently has the following websites:

[www.inspiringcommunitiestogether.co.uk](http://www.inspiringcommunitiestogether.co.uk)  
[www.agefriendlyalsford.org.uk](http://www.agefriendlyalsford.org.uk)

If you use any of the email facilities or forms on our website, we will capture your email address phone number and name. This means we can respond to your request, enquiry or order. We will ask if you want to opt in to being contacted in the future by mail, telephone, email or text.

Information is automatically provided on your browsing behaviour through the use of cookies on our sites. This information does not enable us to identify you personally. However, it does allow us to track usage of our sites so that we can improve them.

We use standard third-party web analytics services (such as Google Analytics) to collect anonymous information about your computer, including your IP address, operating system and browser type. This includes for example the number of users viewing pages on the site, but it does not identify you individually. This means we can monitor and report on the effectiveness of the site and help us improve it.

We may temporarily retain any data that you provide on the website, even if you do not complete your enquiry. Such contact details and data may be used to contact you to enquire if you require any assistance but for no other purpose.



## **E-newsletters**

We use a secure contact management database (CiviCRM) to deliver our e-newsletters. For example, our Age Friendly Salford e-newsletter. We gather statistics around email opening and clicks using industry standard technologies. We do this to help us monitor and improve our e-newsletter.

## **Website hosting**

We use a third-party service to host our websites. The sites are hosted with: Ionos a company registered in the UK: registration no. 03953678. The site is hosted in Ireland in the EU.

## **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our Inspiring Communities Together website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you link to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## **People who contact us through social media**

If you send us a private or direct message through social media, the message will be stored in line with our data retention policy. It will not be shared with any other organisations. Please bear in mind that direct messages sent through social media are not private.

## **What are my rights of access to my information?**

You have the right to ask for access to any of the personal information that Inspiring Communities Together hold about you. If you want to ask for this information please contact our data protection lead Antonia Dunn [office@inspiringcommunitiestogether.co.uk](mailto:office@inspiringcommunitiestogether.co.uk) We will normally respond within one month.

## **Your Right to Complain / Object**

You have the right to complain if you feel your information is not being used in the right way or is incorrect. In the first instance you can contact our data protection lead – Antonia Dunn. If you do not wish to do this, details of our complaints procedure can be found on our website.

If you are still not satisfied with the response from Inspiring Communities Together you have the right to complain to the Information Commissioners Office. For further details about this and your information rights please visit the Information Commissioners website here: <https://ico.org.uk/your-data-matters/>



## How you can access and update your information

The accuracy of your information is important to us. If you would like to review and / or correct the information that we hold about you please contact us at: [office@inspiringcommunitiestogether.co.uk](mailto:office@inspiringcommunitiestogether.co.uk) or write to us at Inspiring Communities Together, Salford Innovation Forum, Frederick Rd, Salford, M6 6FP or telephone: 0161 743 3625

## 13 or under

We are concerned to protect the privacy of children aged 13 or under. If you are aged 13 or under, please get your parent/guardian's or school/college's permission beforehand whenever you provide us with personal information.

## The remit of this statement

This privacy statement does not cover information gathered on other websites outside our control. Our website includes links to other sites, including our partners these sites will all have their own privacy policy.

## Changes to this statement

Inspiring Communities Together will review this statement regularly. The updated document will be circulated to staff and made available on our website.

This document was last updated on 2<sup>nd</sup> November 2021

Our contact details:

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