



Colchester Korban Project
Working with young people in crisis
Reg. Office: Bethany Place
St Anne's Vicarage
Compton Road
Colchester
CO4 0BQ

GDPR PRIVACY NOTICE

PRIVACY STATEMENT

Personal data is any information related to a natural person or 'Data Subject' that can be used to directly or indirectly identify that person, i.e. a name, an email address, a computer IP address, etc.

It is this charity's policy to take all necessary steps to ensure that any personal information is held securely, and processed fairly, lawfully, and transparently, and in accordance with the UK's Data Protection Act 1998, the General Data Protection Regulations and the Privacy and Electronic Communications Regulations.

This Privacy Notice also adheres to the guidelines laid down by the Information Commissioners Office, if further clarification is required, please see the ICO website: <https://ico.org.uk/>

HOW PERSONAL INFORMATION IS USED

Charity name: Colchester Korban Project, hereafter referred to as Korban.

This privacy notice aims to give you, the data subject, an understanding of what happens when we collect and process your personal data.

WEBSITE

Our website address is www.korban.org.uk
Third party service: Wix.com

When individuals access our website, a third-party service will be used to track and report on website traffic. This assists us to gather information about patterns of user behaviour.

The users cannot be identified, and we do not allow the third-party service to identify, or attempt to identify, individuals visiting our website.

If we intend to collect information that can identify an individual, we will let the user know at the time of collecting the personal information, along with an explanation of what we will do with this information.

COOKIES

Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site by placing small text files on your computer when you visit the website.

CHANGING COOKIE SETTINGS

Using browser settings usually allows some control of most cookies.

E-NEWSLETTER

Third-party provider: MailChimp

We use a third-party provider to deliver our e-newsletters. We use industry standard technologies to gather statistics around email opening and clicks, to help us monitor and improve our e-newsletter.

DONATIONS

Third-party provider: Donorbox

We use a third-party provider to manage our online financial giving. Donorbox is GDPR compliant and users of this service have to opt-in to give their consent.

SECURITY AND PERFORMANCE

We use a third-party service to assist in maintaining the security and performance of our website, which required the processing of website user's IP addresses to do so. www.support.wix.com/en/about-wix/privacy

SOCIAL MEDIA

Third-party provider: Facebook and Twitter

If you send us a private or direct message via social media, the message will be stored by a third-party provider. However, it will not be shared with any other organisations.

EMAIL

To encrypt and protect email traffic, we use Transport Layer Security (TLS), in-line with government recommendation. You should be aware that if your email service does not support TLS, any emails we send or receive may not be protected in transit.

We also monitor any emails sent to us for viruses or malicious software, including file attachments. Please be aware that you have a responsibility to ensure that any email you send is within the confines of the law.

COMPLAINTS

When we receive a complaint from an individual, we prepare a file containing the details of the complaint, which usually contains the identity of the complainant and any other individuals involved in the complaint.

Only the personal information collected to process the complaint and to check on the level of service we provide will be used. If we compile and publish statistics showing information, it will not be in a form which identifies any individual.

Usually the identity of the complainant will need to be disclosed to whoever the complaint is about. This is necessary where, for instance, the accuracy of a person's record is in dispute.

If a complainant does not want information identifying him/ her to be disclosed, we will try to honour that. However, it may not be possible to guarantee anonymity.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Furthermore, when dealing with enquiries, we will only use the information supplied to us to deal with the enquiry, and any subsequent issues, and to examine the level of service we provide.

If it is necessary to take enforcement action against someone, the identity of the defendant may be published in the Annual Report etc. However, complainants are not usually identified, unless the details have already been made public.

CHARITY SERVICE USERS

We may use a third party to deal with some publication requests, but they are only authorised to use the information to send out the publications.

To provide the service, it is necessary to hold the details of individuals who have requested it. However, the details will only be used to provide the service the person has requested, and for other closely related purposes., for example, a satisfaction survey.

When people do subscribe to our services, they have the right to object to the processing of their personal data.

Subscribers will be supplied with an easy method to cancel their subscription.

CCTV

The operation of CCTV requires care in the:

- use;
- recording;
- storage; and
- access to recorded material.

As provided under the:

- Data Protection Act 1998 (DPA 1998);
- Protection of Freedoms Act 2012 (POFA 2012); and
- Human Rights Act 1998 (HRA 1998).

The ICO have published data protection guidance: “In the picture: A data protection code of practice for surveillance cameras and personal information”.

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

Also, the Home Office has produced the surveillance camera code of practice, under the POFA, which includes operational obligations, and technical standards and systems.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/282774/SurveillanceCameraCodePractice.pdf

As we operate CCTV, we have sought training to enable us to comply with the ICO and POFA standards. Furthermore, separate procedures are in place to ensure that the rights of individuals recorded by surveillance systems are protected, and that the information is effectively used for its intended purpose.

GRANTS

Any personal information submitted are used only for reviewing the grant application, and the ongoing administration and management of any grants awarded, e.g.

- an application form;
- details of a proposal;
- potential costs; and (if awarded)
- progress reports;
- a final report; and
- final expenses.

We may also publish information about projects on our own website, and some information regarding grants that are awarded are also published on the Government grants register, which includes the name of the grant programme and funder's, a description of the grant's aims and objectives, the value and currency of the grant, the date it was awarded and the name of recipient/ recipient ID.

BREACHES

We are required by law to report any security breaches involving personal data to the ICO. Therefore, we have provided an online form.

This is hosted by: <https://www.korban.org.uk/documents>

The data collected by the form to record the breach and to make decisions about any possible action is only retained for as long as necessary to carry out these functions, and in line with our retention schedule (two years from receipt); longer where this information leads to regulatory action being taken.

We retain de-personalised information about organisations for only as long as is necessary, to help inform future actions.

The charity and the host have measures in place to ensure the security of data collected and transferred to the ICO via this form. The host is a data processor for the charity and only processes personal information in line with our instructions.

JOB APPLICANTS, CURRENT AND FORMER CHARITY EMPLOYEES

The charity is the data controller for the information you provide during the process, unless otherwise stated. If you have any queries about the process or how we handle your information, please contact us at our email address:

mark@korban.org.uk

All the information you provide during the process will only be used for progressing your application, or to fulfil legal or regulatory requirements, and will not be shared with any third parties for marketing purposes. The information you provide, whether in electronic or physical, will be held securely by us and/ or our data processors.

We will only use the provided contact details to progress your application. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than necessary.

The information we ask for is used to assess your suitability for employment. You do not have to supply it, but it might affect your application if you do not.

Application stage

If you apply online, this will be collected by a data processor on our behalf (please see below)., and our recruitment team will have access to all this information.

We will ask you for your personal details including:

- Name;
- contact details;
- previous experience;
- education;
- referees; and
- answers to questions relevant to the role.

You will also be asked to provide equal opportunities information; however, it will not affect your application, if you do not provide it. This information will not be made available to any staff outside of our recruitment team and will be used only to produce and monitor statistics.

Shortlisting

As a small charity our recruitment team shortlist applications for interview.

Assessments

We might ask you to participate in an interview or for assessments where information will be generated by you and by us, e.g:

- a written test;
- role play; or
- interviewer notes.

This information is held by the charity.

If you are unsuccessful, we may ask if you would like us to retain your details for six months. If you accept, we would proactively contact you if any suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks to confirm your identity, your right to work in the United Kingdom and to seek assurance as to your trustworthiness, integrity and reliability.

You will therefore be required to:

- provide proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- provide proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- complete a criminal records declaration to declare any unspent convictions.

We will:

- provide your email address to the Government Recruitment Service who will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- contact your referees directly to obtain references.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work

Post start date

Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held on your personnel file.

Use of data processors

We may use a data processor, who are third parties, who may provide elements of our recruitment service for us. If so, we have contracts in place and this means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Online vacancies (to be completed when applicable)

Data processor: _____

Link to their privacy notice: _____

If you use the online application system, you will provide the requested information to the data processor, who provides this online service for us. They will hold the information you submit, but we will have access to it.

Personnel Records

Internal HR record system: Microsoft, One Drive. Microsoft store data in the EU.

Link to their privacy notice: <https://privacy.microsoft.com/en-gb/privacystatement>

If you accept a final offer from us, some of your personnel records will be held on our internal HR records system.

Payroll Services

Supplied by: Community 360

If you are employed by the charity, relevant details about you will be supplied to our payroll provider service; including:

- your name,
- bank details,
- address,
- date of birth,
- National Insurance Number, and
- salary.

Pension

Pension Scheme: NEST

Dependent on your salary you will be auto-enrolled into the pension scheme and details provided include:

- your name,
- date of birth,
- National Insurance number, and
- salary.

Retaining Information

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes:

- criminal records declaration,
- fitness to work,
- records of any security checks, and
- references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

If applicable the online vacancy data processor will provide us with anonymised information about our recruitment campaigns, which tells us about the effectiveness of campaigns. This anonymised information will be retained for 6 years from the end of the campaign.

Decision Making

Final recruitment decisions are made by our recruitment team, taking into consideration all the information gathered during the application process.

You can ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing mark@korban.org.uk

Secondments

We also offer work with us on a secondment basis and accept applications from individuals or from organisations who think they could benefit from their staff working with us.

Applications are sent directly to us, and if we are interested in speaking to you further, we will contact you using the details you provided.

We might ask you to provide more information about your skills and experience or invite you to an interview.

If we do not have any suitable work at the time, we will let you know, but we might ask you if you would like us to retain your application so that we can proactively contact you about possible opportunities in the future. If you accept, we will keep your application for 6 months.

You will be expected to adhere to a confidentiality agreement and code of conduct which will be agreed with your organisation.

We might also ask you to complete our pre-employment checks, or to obtain security clearance via the National Security Vetting process. Whether you need to do this will depend on the type of work you will be doing for us.

We ask for this information so that we fulfil our obligations, to avoid conflicts of interest and to protect the information we hold.

It will be retained for the duration of your secondment, plus 6 years following the end of your secondment.

YOUR RIGHTS

Under the Data Protection Act 1998, you have rights as an individual, which you can exercise in relation to the information we hold about you.

COMPLAINTS OR QUERIES

We endeavour to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously and encourage individuals to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate, and welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of the charity's collection and use of personal information. However, we are

happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact www.ico.org.uk/concerns.

ACCESS TO PERSONAL INFORMATION

We aim to be as open as possible in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you, we will:

- verify your identity using "reasonable means";
- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request for any personal information you may need to put the request in writing addressing it to:

Mark Wood, Colchester Korban Project, Bethany Place, St Anne's Vicarage, Compton Road, Colchester, Essex CO4 0BQ

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes made by us.

DISCLOSURE OF PERSONAL INFORMATION

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, we may need to share personal information in order to properly investigate.

LINKS TO OTHER WEBSITES

This privacy notice does not cover the links to other websites. We encourage you to read the privacy statements on the other websites you visit.

CHANGES TO THIS PRIVACY NOTICE

We keep our privacy notice under regular review.

Date of last review: 10th October 2018

Next review due: 9th October 2019

HOW TO CONTACT US

If you want to request information about our privacy policy, you can email us at mark@korban.org.uk or write to:

Mark Wood, Colchester Korban Project, Bethany Place, St Anne's Vicarage, Compton Road, Colchester, Essex CO4 0BQ

PROCEDURE

We provide individuals with all the following privacy information:

- The name and contact details of our organisation.
- The name and contact details of our representative (if applicable).
- The contact details of our data protection officer (if applicable).
- The purposes of the processing.
- The lawful basis for the processing.
- The legitimate interests for the processing (if applicable).
- The categories of personal data obtained (if the personal data is not obtained from the individual it relates to).
- The recipients or categories of recipients of the personal data.
- The details of transfers of the personal data to any third countries or international organisations (if applicable).
- The retention periods for the personal data.
- The rights available to individuals in respect of the processing.
- The right to withdraw consent (if applicable).
- The right to lodge a complaint with a supervisory authority.
- The source of the personal data (if the personal data is not obtained from the individual it relates to).
- The details of whether individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to).
- The details of the existence of automated decision-making, including profiling (if applicable).

When we provide it

- We provide individuals with privacy information at the time we collect their personal data from them.

If we obtain personal data from a source other than the individual it relates to, we provide them with privacy information:

- within a reasonable of period of obtaining the personal data and no later than one month;

- if we plan to communicate with the individual, at the latest, when the first communication takes place; or
- if we plan to disclose the data to someone else, at the latest, when the data is disclosed.

How we provide it

We provide the information in a way that is:

- concise;
- transparent;
- intelligible;
- easily accessible; and
- uses clear and plain language.

Changes to the information

- We regularly review and, where necessary, update our privacy information.
- If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

Best practice – drafting the information

- We undertake an information audit to find out what personal data we hold and what we do with it.
- We put ourselves in the position of the people we are collecting information about.

Best practice – delivering the information

When providing our privacy information to individuals, we use appropriate techniques.

For Further Information:

- *ICO website*
- *Our data representative Robin Pagden by phone on 01206 869533 or email: datarep@korban.org.uk*

February 2022