

National Portage Association
DATA PRIVACY POLICY (22nd May 2018)

1. About this policy

- 1.1 This policy explains when and why we collect personal information about our members, customers, staff and contractors; how we use it; how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [www.portage.org.uk] or our mailings regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

- 2.1 We are the National Portage Association

We can be contacted at: Kings Court, 17 School Road, Hall Green, Birmingham B28 8JG.

Tel: 0121 244 1807

E-mail: info@portage.org.uk

- 2.2 We control official NPA communication (like the Portage website, NPA emails, the NPA’s Facebook page and Twitter feed). We have no control over other websites or social media (whether unofficially linked to the NPA or not) and cannot take responsibility for what appears on them, including re-posts of items from our official channels.

3. What information we collect and why

Information collected, its purpose and the legal basis for processing are given below for the different categories of people we deal with. You may fall into more than one category. The categories are:

- All NPA office /events / website visitors
- Service members
- NPA members / lapsed members
- Training Customers – such as Workshop training, Development Days, Conference, Regional Days and NVQ students.
- Suppliers
- Staff / trainers / contractors

3.1 All NPA Office / Events / Website Visitors

Type of information	Purposes	Legal basis of processing	Retention Period
Accident information	To record accidents for our own review & as per the requirements of the First Aid & RIDOR Regulations.	For the purposes of our legitimate interests in operating the Association	15 years
Photos & videos of members / customers See also: - Section about Board members' images in Members' section. - Section about Staff /trainers/ contractors' images in Staff / trainer / contractor section.	For use in the NPA's internal & external publicity & promotional materials including press, websites & social media platforms.	Most images would not be classified as personal data. To be personal data it must be possible to identify an individual from information within the image or text associated with the image, being recognised by family or friends is not the same as being identified. Where images are personal data, consent will be obtained before use. In such cases the individual may withdraw their consent at any time by contacting us by e-mail or letter but should be aware that: - It may not be possible for printed material to be taken out of circulation or altered until the next printing. - We can only remove images from the websites and social media that we control (see 2.2).	Indefinite
<u>Those making a payment:</u> Bank account details	Managing the member's membership and / or the provision of services & events provided by the NPA.	Performing the NPA's contract with the member / customer.	
<u>Data about use of website:</u> IP address Geographical location Browser type & version Operating system Referral source Length of visit Page views Website navigation paths Timing, frequency & pattern of use	To allow us to analyse use of the website.	For the purposes of our legitimate interests in operating the NPA, specifically monitoring & improving our website.	Indefinite

3.2 Service Members / Lapsed Service Members

Type of information	Purposes	Legal basis of processing	Retention Period
Service: Name Address Telephone number(s) E-mail address(es) Contact names Contact Job titles Qualifications of team members Bank account details Correspondence	Creating & managing the NPA's service membership database	Performing the NPA's contract with services members.	Lapsed members- within 12 months of service m'ship ending.
	Managing the trainers database	Performing the NPA's contract with services members	
	Communicating with service members about their membership & training events held by the NPA.	Performing the NPA's contract with services members	
	Providing service members contact details on the NPA website for public use	With consent for the purposes of our legitimate interests in operating the NPA	
	Maintenance of service quality standards	For the purposes of our legitimate interests in operating the NPA.	

3.3 NPA Members / Lapsed Members

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Member:</u> Name Address Telephone number(s) E-mail address(es) Bank account details Correspondence	Managing the member's membership of the NPA.	Performing the NPA's contract with member(s).	Lapsed members- within 12 months of m'ship ending.
	Creating & managing the NPA's membership database	For the purposes of our legitimate interests in operating the NPA.	
	Managing the trainers database.	For the purposes of our legitimate interests in operating the NPA.	
	Communicating with members about their membership & training events held by the NPA.	For the purposes of our legitimate interests in operating the NPA.	
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the member's vital interest.	
Those owing the NPA money: Name Amount owed	For the collection of debt & the enforcement of the NPA's Rules & Regulations.	For the purposes of our legitimate interests in operating the NPA.	Until the debt has been paid
<u>Board Members</u> Telephone number(s) Home addresses E-mail address(es) Photos & videos	Information published on the NPA's website, Operating Procedures, newsletters & other publications & marketing materials. Compliance with Charity regulations and provision of audited accounts.	For the purpose of our legitimate interests in operating & promoting the NPA.	12 months after cease in role
<u>Board Members</u> Meeting minutes	To maintain a record of committee discussions & decisions.	For the purpose of our legitimate interest in operating the NPA.	Indefinite

3.4 Training Customers (Workshops, Regional meetings, Development Days, Conference, Trainers Forums other NPA training)

Type of information	Purposes	Legal basis of processing	Retention Period
Name Address Telephone number(s) E-mail address(es) Correspondence	Managing the provision of training & events provided by the NPA.	Performing the NPA's contract with the customer. For the purposes of our legitimate interests in operating the NPA, its services & events.	End of financial year
	For marketing the NPA & its activities.	Informed consent. We will seek the customer's consent on their registration / entry form.	Until consent withdrawn
Health and dietary information	For risk assessment and DDA adjustments & in case of emergency.	For use with explicit consent. Protecting the visitor / customer's vital interest.	End of financial year
<u>Those taking part in training courses:</u> Courses passed Date of course Certificate number	To keep a record of qualifications held for checking when required.	For the purpose of our legitimate interests in running training courses.	Indefinite
<u>Those taking part in trainers forums, development days:</u> Name Service Date of event	To keep a record of attendance to manage compliance with NPA criteria for trainer accreditation	For the purposes of our legitimate interests in operating the NPA.	6 years after date of attendance

3.5 Suppliers

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Employees & representatives:</u> Name Address Telephone number(s) E-mail address(es) Bank account details Correspondence	Entering & managing arrangements with suppliers.	Entering into & performing contracts with suppliers.	2 years after cease to be a supplier

3.6 Staff / Trainers / Contractors

Type of information	Purposes	Legal basis of processing	Retention Period
Name Address Telephone number(s) E-mail address(es) Relevant qualifications DBS certificates Correspondence	Managing employment, staff & contractors.	Performing the NPA's contract with the employee / contractor.	6 years after cease to be employed
	Managing employment, training & other activities at the NPA.	For the purposes of our legitimate interests in operating the NPA and managing staff, training & other NPA activities.	
	Communicating with employees & contractors about their work & activities at the NPA.	For the purposes of our legitimate interests in operating the NPA.	
	Information published on the NPA's website, Operating Procedures, newsletters &	For the purpose of our legitimate interests in operating & promoting the NPA.	

	other publications & marketing materials.		
Date of birth / age	Managing employment, staff & contractors.	Performing the NPA's contract with the employee / contractor.	
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the employee / contractor's vital interests & those of their dependants.	
Health information	For risk assessments, DDA adjustments & in case of emergency.	For use with explicit consent. Protecting the employee / contractor's vital interest.	
Record & outcome of disciplinary hearings	For the enforcement of the employment contract.	Performing the NPA's contract with the employee / contractor.	
Bank account details NI details	Managing employment, staff & contractors.	Performing the NPA's contract with the employee / contractor.	
Photos & videos	For use in the NPA's internal & external publicity & promotional materials including press, websites & other social media platforms.	For the purpose of our legitimate interests & the staff's role in promoting the NPA.	12 months after cease in role
<u>Committee Attendees</u> Meeting minutes	To maintain a record of committee discussions & decisions.	For the purpose of our legitimate interest in operating the NPA.	Indefinite

4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the EEA without your consent.
- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

- 5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law.

6. How long do we keep your information?

- 6.1 We will hold your personal data on our systems as indicated in the tables above or for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of

legal claims. The NPA is expected to keep information for 6 years for: claims in contract; tort (excluding personal injury); tax and VAT; payroll and employment. For personal injury there is a 3 year limitation and for negligence up to 15 years limitation.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Office Administrator by contacting info@portage.org.uk