

# Howbury Tumblers Privacy Policy

This privacy policy sets out how Howbury Tumblers uses and protects any information that you give us.

Howbury Tumblers is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement.

As we collect data from you, that makes us as staff your data processors, and the Howbury Charity Tumblers trustees the Data Controllers, and Parents & Carers, staff, and trustees are all Data subjects.

Howbury Tumblers may change this policy from time to time and will update the Privacy Policy link on our webpage, and notify you of these changes in our newsletter. You should check these from time to time to ensure that you are happy with any changes.

## What we collect

We may collect the following information:

- Name, contact details – address and telephone number
- Child's name and date of birth
- Medical advice – eg medical conditions , allergy information for your child
- Emergency contact names and telephone numbers
- Photo consent , for using photographic evidence

## Where we collect information about you from

When you give it to us directly:

- Tumblers registration form
- Crèche registration form
- Student placement contact form
- Accident / Incident forms
- Party booking forms
- Trustee Data consent form
- Staff personal data – names address, contact details, NI numbers, record of training, DBS number

When you give permission to other organisations to share or it is publicly available:

- When you 'like' or comment on our Facebook Group or page
- When you are referred to us for a service by another organisation e.g. Netmums
- When information is found in Charities Commission website

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and for:

- Caring for your child's needs as an individual and being aware of things that may harm your child or be detrimental to their welfare
- Internal record keeping – numbers of attendees , daily attendance records ( for Health & safety )
- Using information provided to review, plan and improve our services

- To give Feedback to Grant funders
- To Fulfil our requirements to The Charity Commission ( Trustee details only)
- For ensuring we can deliver or signpost you to an appropriate support services

## **How we keep your data safe and who has access**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

- All sensitive personal data is ONLY held on the form that the Data subject has completed. It is not stored electronically, nor any details on it duplicated anywhere else without explicit prior consent.
- Clerical records (as above) are held securely, in a locked cabinet in a controlled area at Howbury Tumblers, and only accessed by Lead staff members.
- The Data is never transferred to another location.
- Staff details are kept securely as above, Ni numbers are not stored, only passed on to the Payroll provider. DBS remain in the keeping of the owner; only the number is stored by us, and date of DBS.
- emails are encrypted ( trustees and staff only are contacted by Email)
- Network is protected and routinely monitored.
- We use external companies to support us in processing some of our data eg our Payroll provider, and our website host, Sitebuilder. We have confirmed that these companies are GDPR compliant or working towards compliance by 25<sup>th</sup> May 2018.
- We may need to disclose your details if required to police, regulatory bodies e.g. safeguarding concerns or legal advisors
- We will not share your data with any third Party for marketing or sales purposes
- We will only ever share your data in other circumstances if we have your explicit and informed consent

## **Fair processing**

We have carried out Data mapping and Privacy Impact assessments, data breach risk assessments, and made changes in the amount of data, and the way we collect data from you, how we keep it safe , how long we keep it for and how it is destroyed so that we are 'fairly processing' your data . We will only share data in the ways explained on the privacy notices we have given to each different way in which we collect Data – on the registration forms, Crèche forms, other paperwork and on our Website – (we do not collect Data from users of our website but our website hosts use cookies to track ITP locations and give us information on user numbers of our site) - so that you are aware of this prior to you giving data to us or accessing a service. We have adopted a 'privacy by design' approach to handling your data, so that we are fully compliant in handling your data, keeping it safe, and so you have confidence in us to trust us with such personal information as we require to care for you and your child.

## **Data Retention**

We will not hold data about you any longer than we need to for processing purposes. Exceptions to this are legal requirements that we are obliged to comply with for example; contracts, employment records and financial records, accident & incident forms.

## **Data Breach**

If there is a breach of data protection, we will always record it here at Howbury Tumblers. If the breach is serious, we are required to report it to the Information Commissioners Office within 72 hours of the breach. If we assess the breach will cause any risk to you or your organisation, we will also inform you within 72 hours.

## Controlling your personal information

Our legal basis for collecting your personal data is a legitimate interest. The only exceptions to this are : (1) Photographic Consent forms (2) Trustee data consent forms.

We have assessed that in order to provide you and your child with the best care, support, advice, and information, we need to collect your personal data. We will not use any direct marketing, sales or fundraising promotions under our legitimate interest. You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g., registering for an event) we will do so. Contact us at [howburytumblers@gmail.com](mailto:howburytumblers@gmail.com) if you have any concerns. Or you can speak to **Clare Tyrrell our Data Lead Officer on 07950 911324**

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so.

If you have consented to the use of Photos as in the consent form, or are a Trustee, and have consented to us holding contact data about you, you can withdraw this consent at any time. This will not affect your rights to access our services, nor the standard of services that are provided for you or your child.

You may request details of personal information which we hold about you under the Data Protection Act 1998 (due to be updated in May 2018) which describes the right for an individual to apply for a Subject Access Request at no cost. If you would like a copy of the information held on you please contact Clare as above or email [howburytumblers@gmail.com](mailto:howburytumblers@gmail.com) and we will provide you with a Data Subject access form.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

If you have any concerns about how we are processing your personal data and we have not been able to adequately answer your concern, you should contact the Information Commissioners Office to raise a concern on their website [www.ico.org.uk](http://www.ico.org.uk) or telephone 0303 123 1113