

Data Protection & Privacy Policy

The Altering Group is committed to ensuring that all personal data held by us is processed lawfully, fairly, and transparently, and that the rights of data subjects are protected. This policy applies to all individuals working on behalf of The Altering Group, including staff and volunteers.

Directors are responsible for overseeing data protection and leading on any incident investigation and reporting. They will also ensure that all staff and volunteers are provided with training regarding GDPR and made aware of their data protection responsibilities.

When dealing with personal information, we comply with the UK Information Commissioner's Office (ICO) guidelines on data protection, the Data Protection Act 2018 and any other relevant legislation.

By providing us with personal information or using our website, you are agreeing to this policy.

Data Protection

Data protection is the practice of safeguarding personal information by applying data protection principles and complying with the Data Protection Act. The Data Protection Act is a UK law that regulates the processing of personal data.

UK GDPR: The UK General Data Protection Regulation, which outlines the rules for processing personal data in the UK.

Data Processor: An individual or organisation that processes personal data on behalf of a data controller.

Data Controller: An individual or organisation that determines how and why personal data is processed.

Data Subject: An individual whose personal data is being processed.

Processing: Any operation performed on personal data, including collection, storage, use, and disclosure.

Personal Data: Any information that can identify a living individual, such as name, address, or email address.

Sensitive Personal Data: Personal data that requires extra protection, such as health information or ethnic origin.

Direct Marketing: Any communication aimed at promoting a product or service directly to an individual.

Valid Consent: Consent given freely, specifically, and informed, and can be withdrawn at any time.

Legitimate Business Purpose: A lawful reason for processing personal data that is necessary for the legitimate interests of the data controller or a third party.

Data Collection

The Altering Group collects various types of data to allow us to deliver our services and operate effectively. The data collected may vary depending on the services accessed and may include, but is not limited to:

- Personal Information, such as name, contact information, date of birth & address

- Emergency contact details, medical history, and special requirements necessary for participation in services
- Information related to mental health, wellbeing, session attendance, session notes, assessment information, outcomes, and reports from relevant professionals
- Consent records
- Data collected from registration forms and feedback surveys
- Billing details, donations, payment processing information, and financial records to verify eligibility for subsidised services
- Correspondence through emails, phone call logs, messages, or other forms of communication with service users or partners
- Digital and Web Activity Data, such as account information, IP addresses, activity on our website and patterns via cookies and server logs
 - You can manage or disable cookies by adjusting your browser settings. Please note that disabling cookies may affect website functionality.

We will only collect data that is relevant and necessary. Data collected for a specific purpose will not be used for any other purpose without obtaining explicit consent from the data subject.

Data collected is also only accessed by or shared with those who need this information. This includes employees and volunteers at The Altering Group and third parties, who must all adhere to confidentiality standards and applicable data protection laws.

Security measures such as using encrypted databases and secure data storage systems, regular audits of data storage, back up and recovery systems, access controls, keeping data anonymised where applicable, password protections, and ongoing training for staff and volunteers are in place to minimise the risk of unauthorised access or disclosure of personal data, or data breaches. In the event of a data breach, we will follow notify affected individuals and report this to the Information Commissioner's Office (ICO) within 72 hours, if required to.

We may also collect and process special category data, such as your race or ethnicity, religion, political opinions, health and genetic data, gender identity, sexual orientation and sex life and other sensitive data. This data is gathered to ensure we are creating, delivering and monitoring tailored services, provide equitable access and fulfil contractual and legal obligations.

We use anonymised or aggregated demographic data for statistical analysis to identify service gaps, support funding applications, and improve service delivery. Anonymised or aggregated demographic data may be shared with referral partners or service funders to support outcome monitoring and reporting. When referring clients to external organisations, we seek consent to complete these, unless we are required to complete a referral under legal obligations (such as safeguarding concerns), and necessary demographic details may be included.

Where this data is not anonymised, it will be treated as personal and sensitive data and handled with confidentiality in line with this policy and GDPR legislation.

In some instances, data we collect may be to comply with legal obligations or to fulfil the terms of a contract or service agreement (e.g. providing counselling or workshop services). If the required information is not provided when requested, this may limit our ability to deliver the service effectively. In such cases, we will inform you of the potential implications and any cancellation of services at the time.

We collect data through various means, including consent forms, referral and registration forms, assessments, outcome measures, feedback surveys, and direct communication, and the type of data collected depends on the service accessed.

When interacting with our website, we may collect technical data such as IP addresses, browsing actions, and patterns via cookies and server logs.

- You can manage cookies by adjusting your browser settings. Please note that disabling cookies may affect website functionality.

Our Client Database

We use a client database, Kiku to record and manage client information. This system holds personal and clinical data, including client contact details, emergency contacts, session notes, and appointment history. This system is UK GDPR compliant.

Not every service requires a full digital record. Only specific services will have data stored in Kiku, depending on what is necessary and proportionate, such as our counselling or youth mentoring services.

Only authorised members of The Altering Group's team, such as counsellors, supervisors, mentors, safeguarding leads, administrators and managers, can access Kiku, and only for legitimate service-related purposes. Only relevant members of the team can access individual client records.

Please see Kiku's Privacy Policy for more information at <https://www.wearekiku.com/privacy-notices>

Data Use

The Altering Group collects and uses data to:

- operate effectively, delivering high-quality services tailored to the community's needs
- manage client accounts and provider customer support
- ensure appropriate support for all service users
- contact service users and external organizations, including emergency services or medical professionals, when necessary, if there is a suspected risk of harm to the individual or others
- monitor and evaluate effectiveness of our services, identifying areas for improvement and service gaps
- measure and enhance accessibility of our services
- inform service users and stakeholders about updates and alerts
- support funding applications and perform statistical analyses
- fulfil contractual and legal obligations, including safeguarding responsibilities or legal requests
- report on outcomes and service delivery to stakeholders
- enhance service delivery through research, evaluation and service user feedback

How we use data may also depend on the service accessed.

Our counselling service collects data for purposes such as, but not limited to, making clinical decisions and allocating service users to counsellors, delivery of tailored therapeutic interventions, compliance with ethical and professional standards and safeguarding of service users, staff and the public where necessary.

Our workshop and project services collect data for purposes such as, but not limited to, obtaining consent for children and young people attending workshops, ensuring that workshops and projects meet the specific needs of participants, identify skills and knowledge gaps and measure improvements and informing future project planning.

Our mentoring service delivered in schools collects data for purposes such as, but not limited to, obtaining and recording parental and school consent, allocating mentees to appropriate mentors, understanding the individual needs, goals and contextual factors affecting children and young people, delivery of targeted and developmentally appropriate mentoring support, monitoring engagement and progress, supporting safeguarding and child protection responsibilities, and meeting statutory, contractual and professional obligations in educational settings.

Our organisational training service collects data for purposes such as, but not limited to, registering participants and managing attendance, understanding organisational context, training needs and learning objectives, tailoring training content and delivery, measuring learning outcomes and training impact, meeting contractual, quality assurance and professional standards, and informing evaluation, reporting and future training development.

Lawful Basis for Processing

The Altering Group processes personal data in accordance with the lawful bases outlined in UK GDPR. Depending on the nature of the service, personal data may be processed under one or more of the following lawful bases:

- Consent - where individuals have given clear permission for us to process their data
- Contract - where processing is necessary to deliver a service requested by the individual
- Legal obligation - where processing is required to comply with legal or regulatory requirement
- Legitimate interests - where processing is necessary for the legitimate interests of The Altering Group or a third party and does not override the rights of the individual
- Vital interests - where processing is necessary to protect someone's life or safety

Special Category Data Processing

Where The Altering Group processes special category data, this is done in accordance with Article 9 of the UK GDPR. Processing may take place under one or more of the following conditions:

- Explicit consent from the data subject
- Provision of health or social care, including counselling, mentoring and wellbeing services
- Safeguarding of children or individuals at risk, where there is a substantial public interest
- Establishing, exercising or defending legal claims where necessary

Data Records

Data retention periods are determined based on service type and legal requirements. Personal data, including consent forms, is retained for seven years.

Counselling records are retained for seven years after the final session. Workshop and training records are retained for seven years following the session.

Where records relate to children or young people under the age of 18 (for example mentoring or workshop participation), records will be retained until the individual reaches the age of 25, or for seven years after they turn 18, in line with safeguarding and legal guidance.

Financial records are retained for six years to comply with legal obligations.

After the retention period, all data is either securely deleted, or anonymised (where data that can be linked back to an individual is removed) and retained for statistical analysis, funding applications, and service improvement purposes.

The Altering Group regularly completes audits to ensure compliance with the above retention requirements and that no data that is no longer needed is destroyed.

Your Legal Rights

Under the UK GDPR and Data Protection Act, you have the following rights regarding your data:

1. Right to Access: Request access to the personal data we hold about you. You have the right to ask us what, if any, personal information we hold about you, why we hold that information, who we may be sharing your information with, where the information came from and to explain any technical or complicated terms relating to the information.
2. Right to Rectification: Request correction of any inaccurate or incomplete data.
3. Right to Erasure: Request deletion of your data, subject to legal or safeguarding obligations.
4. Right to Restriction: Limit processing of your data in certain circumstances.
5. Right to Data Portability: Receive a copy of your data in a structured, commonly used format.
6. Right to Object: Object to processing based on legitimate interests.
7. Right to Withdraw Consent: Withdraw consent for data processing at any time, where consent is the lawful basis.

To exercise your rights or raise concerns, please contact us at on contact@thealteringgroup.co.uk or 020 3538 5877.

To access your personal information, you must make a request in writing, which is called a subject access request. To do this, please write to us at contact@thealteringgroup.co.uk.

We have a maximum of one month to respond to any subject access requests, however we will respond to any queries or requests as soon as possible.

If you are dissatisfied with our response, you have the right to raise a complaint with the Information Commissioner's Office (ICO).

There are some specific situations where we are allowed to withhold personal information from you. These include:

- if your request is 'manifestly unfounded or excessive'
- if the data includes third-party information, meaning personal information about someone else

- if sharing it would likely cause serious harm to you or another person
- if sharing it would make preventing crime or prosecuting criminals harder for the police.

If we feel we need to withhold personal information from you, we will write to you outlining the reason and why.

Use of Imagery/Video

All images and videos are protected under copyright law. Permission will be obtained from the copyright owner, typically the person who captured the image, before use.

We may use images or videos taken during the delivery of our services, events, or workshops for promotional purposes and reporting on our website, social media platforms, and other relevant channels. When photographing large groups, individuals, or parent/guardians where appropriate, will be given the opportunity to opt out of any images or videos taken.

Consent will be obtained before the use of any images of, or containing individuals or groups or any sensitive personal data. This consent is usually obtained from the subjects featured in the image.

Consent will be obtained from a parent, guardian, or legally authorised representative, before the use of any images of, or containing children and young people children or vulnerable individuals. In addition, the use of such images should not pose any risk to the individuals.

Fundraising and Donations

We will respect the privacy and contact preferences of our donors and supporters at all times, including requests to opt out of receiving marketing communications. We may contact donors for administrative purposes, such as resolving a payment issue or providing updates related to your donation.

Data Protection Lead

The Altering Group's Data Protection Lead is Lucy Knight. They should be contacted at contact@thealteringgroup.co.uk or on 020 3538 5877.

Data Controller

The Altering Group acts as the Data Controller for the personal data collected through our services, website and organisational activities. This means we determine the purposes for which personal data is processed and how it is processed.

In some circumstances, we may work with external organisations who act as Data Processors, processing personal data on our behalf under appropriate data processing agreements.

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