



Speaking Out Forum

## GDPR Privacy Policy

Last Updated: May 2025

### 1. Introduction

Speaking Out Forum is committed to protecting personal data and respecting the privacy of all involved in its operations, and all participants attending our programmes, workshops, or events.

Speaking Out Forum takes the security of personal data very seriously and is committed to conducting its activities in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

This policy sets forth expected behaviours of Speaking Out Forum trustees, employees, contractors, and volunteers, as well as any Third Parties, in relation to the collection, use, retention, transfer, disclosure, and destruction of any personal data.

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### 2. Data Protection Officer (DPO)

In accordance with guidelines issued by the Information Commissioner's Office (ICO), it will not be necessary for the Speaking Out Forum to appoint a DPO.

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### 3. What Personal Data We Collect

We may collect and process the following personal data:

**From Supporters and Donors:**

- Name
- Contact details (email address, phone number, postal address)
- Donation history and preferences

- Gift Aid information (where applicable)

**From Contractors and Volunteers:**

- Name and contact details
- Proof of ID
- Proof of address
- References
- Disclosure and Barring Service (DBS) certificate information
- Information about criminal convictions or offences (where relevant to their role)
- Payment or invoicing information (for contractors)
- Emergency contact information (for volunteers)
- Records of any communication related to their work with the charity

**From programme, workshop, or event participants**

- Name
- Age
- Emergency contacts
- Details related to accessibility needs

**From Website Users:**

- IP address and browsing data (via cookies, if applicable – see section 8)

We only collect special category or criminal conviction data where it is necessary, proportionate, and legally justified.

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## **4. How We Use Your Personal Data**

We use personal data to:

- Manage communications with supporters, donors, and volunteers
- Administer donations, Gift Aid claims, and thank-you messages

- Organise events, volunteering, or outreach activities
- Assess suitability for roles involving vulnerable individuals or regulated activity (through references, DBS checks, and disclosures)
- Fulfil legal, financial, and contractual obligations
- Improve our website and digital services (if applicable)
- Provide any necessary accessibility adjustments (for programme, workshop, and event participants).

We will only use your data for the purposes for which it was collected and will not use it in any way that is incompatible with those purposes.

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## 5. Legal Basis for Processing

We rely on the following lawful bases to process your personal data:

- **Consent** – where you have given us permission (e.g., to receive our newsletter).
- **Contract** – where processing is necessary to fulfil a contract (e.g., with contractors).
- **Legal obligation** – for compliance with charity law, tax law, etc.
- **Legitimate interests** – where processing is necessary for our activities and does not override your rights.

For special category information, we process this data under:

- **UK GDPR Article 10** (processing of criminal conviction data), and
  - **Schedule 1, Part 2 of the Data Protection Act 2018** – specifically for safeguarding individuals at risk, and employment or volunteering vetting purposes.
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## 6. How We Store and Protect Your Data

We take appropriate technical and organisational measures to protect your data, including:

- Using secure, password-protected systems

- Limiting access to personal data on a need-to-know basis
- Keeping physical records securely

We retain personal data only for as long as necessary to fulfil our obligations or until you ask us to delete it, unless legally required to retain it longer (e.g., for Gift Aid records – 6 years).

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## **7. Sharing Your Information**

We do not sell or rent your personal data to third parties.

We may share data with trusted service providers who support our work (e.g., IT providers, accountants, mailing platforms), but only where:

- A data processing agreement is in place
- They follow UK GDPR requirements
- They only process data on our instructions

We may also share data when required by law (e.g., HMRC, Charity Commission, DBS, or other safeguarding authorities).

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## **8. Cookies and Website Analytics**

If we use cookies on our website, we will inform users and obtain consent where required.

Cookies may be used to:

- Understand how visitors use our website
- Improve website performance

Users can manage cookie preferences through their browser settings.

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## **9. Your Data Rights**

Under the UK GDPR, you have the right to:

- Access the personal data we hold about you
- Correct inaccurate or incomplete data
- Request deletion of your data (“right to be forgotten”)
- Restrict or object to processing
- Withdraw consent at any time
- Data portability (in certain cases)
- Complain to the **Information Commissioner’s Office (ICO)** at [www.ico.org.uk](http://www.ico.org.uk) if you are unhappy with how we use your data

To exercise any of these rights, contact us at [hello@speakingoutforum.org.uk](mailto:hello@speakingoutforum.org.uk)

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## 10. Changes to This Policy

We may update this Privacy Policy from time to time. Any changes will be posted on our website or communicated via email where appropriate.

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## 11. Data Breaches

We take data security very seriously. In the event of a personal data breach—where personal data is lost, stolen, accessed without authorisation, or disclosed—we will:

- Assess the nature and scope of the breach immediately.
- Contain the breach and recover any compromised data where possible.
- Evaluate the risk to individuals, including any potential harm.
- Notify the Information Commissioner's Office (ICO) within 72 hours, where the breach is likely to result in a risk to the rights and freedoms of individuals.
- Inform affected individuals without undue delay if the breach is likely to result in a high risk to their rights or freedoms.

All breaches must be reported internally to the charity's Data Protection Contact as soon as they are identified.

To report a data breach or suspected breach email [hello@speakingoutforum.org.uk](mailto:hello@speakingoutforum.org.uk)

We maintain a record of all personal data breaches, regardless of whether they are reported to the ICO.

For more information or to report a breach directly to the ICO, visit: [www.ico.org.uk](http://www.ico.org.uk)

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### **Contact Us**

If you have any questions or concerns about this policy or how we handle your data, please contact:

[hello@speakingoutforum.org.uk](mailto:hello@speakingoutforum.org.uk)