

**Empowering Families**

**Privacy Notice**

**Version 1 - June 2024**

**Introduction**

Empowering Families is the business name which is used by sole trader Paul Davies.

We are committed to protecting your privacy. At all times we aim to respect and keep safe any personal information you share with us, or that we receive from other organisations.

This privacy policy (‘Privacy Policy’) describes how we collect and use personal information about you during and after your relationship with Empowering Families in accordance with the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018 and other applicable UK and EU laws that regulate the collection, processing and privacy of your personal information (together, ‘Data Protection Laws’).

Please read this privacy statement carefully and revisit this page from time to time to review any changes that we may have made.

The provision of your personal information to us is voluntary. However, without providing us with your personal information, your use of our services or your interaction with us may be impaired.

**When we collect information about you:**

We collect information about you:

1. When you give it to us directly

For example, personal information that you submit to us through our referral form or by completing an application to provide a service to us; or personal information that you give to us when you communicate with us by email, phone, letter or face to face.

2. When we obtain it indirectly

For example, your personal information may be shared with us by third parties such as schools or other partner agencies.

3. When it is available publicly

Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services (such Facebook). Please refer to the privacy policies that these sites use for details of how to change your settings.

**What information do we collect?**

Personal information is any information relating to an identified or identifiable individual. We may collect, use, store and transfer different kinds of personal information about you when we engage with you, including, but not limited to:

* Your name (and, where appropriate, previous names) and contact details, including postal address, home and mobile telephone numbers and email address.
* Your date of birth, gender and nationality.
* Your national insurance number.
* Information contained in identification documents such as passports or utility bills.
* Details of your qualifications, experiences and/or interests.
* Your financial information, such as bank details.
* Information about our services which you use/which we consider may be of interests to you.
* Photos, videos or audio recordings used as part of our work with you.
* School information, including schools attended and additional needs.
* Information about your organisation and its employees and stakeholders including, where applicable, your directors, trustees, office addresses, email addresses, phone numbers and bank details. In some cases, we may need further details such as date of birth or home address of key persons. If we request further details of beneficiaries or volunteers, we will discuss this with you and ensure that this is obtained in accordance with Data Protection Laws.
* Any other personal information which we receive as per section 1.

We may also collect, store and otherwise use the following ‘special categories’ of sensitive personal data which need more protection. We would only collect sensitive personal data if there is a clear reason for doing so. Such special categories of personal data include:

* Information about your race or ethnicity.
* Philosophical or religious beliefs.
* Sexual orientation.
* Political opinions.
* Trade Union membership.
* Information about your health.
* Information about criminal convictions.

 We will not use any special categories of personal data without justified reason.

**How will we use your personal information?**

Your personal information, however provided to us, will be used for the purposes specified in this Policy. We may use your personal information in a number of ways including, but not limited to, the following:

* To provide you with services or information you have requested.
* To provide further information about our work, services, activities or events (where necessary, only where you have provided your consent to receive such information).
* To answer your questions/requests and communicate with you in general.
* To analyse and improve our work, services, activities and events (including our website), or for our internal records.
* To report on the impact and effectiveness of our work.
* To run/administer our website, keep it safe and secure and ensure that content is presented in the most effective manner for you and for your device.
* To process your application for a mentor role.
* To register and administer your participation in events or for other administrative purposes.
* To confirm your identity.
* To satisfy legal obligations which are binding on us, for example for volunteers who will work with children on our behalf (including Safeguarding Concerns) under the Police Act 1997.
* To audit/administer our accounts.
* To analyse and improve our internal business processes.
* For the prevention of fraud or misuse of services.
* For the establishment, defence and/or enforcement of legal claims.

**Lawful bases**

The UK GDPR requires us to have a “legal basis” for processing (using) your personal information. The following are the likely grounds on which we may use your information:

**Consent –**Where you have provided your consent for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you email newsletters, and we may ask for your explicit consent to collect special categories of your personal information).

**Mentor Applications–** We may process your personal data as part of an agreement or arrangement you have with us. For example, to administer your application to deliver some mentoring on behalf of Empowering Families.

**Legal Obligation –** We may process your personal data If it is necessary to comply with a legal or regulatory obligation that applies to us.

**Vital interests –**Where it is in your or someone else’s vital interests. For example, in case of medical emergency or safeguarding emergency.

**Legitimate interests –** The UK GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others’ legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). We will only then proceed where we believe our interests are not overridden by the impact on you. When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you, and your rights under Data Protection Laws.

**Information about Criminal Convictions**

We will only collect information about criminal convictions where it is appropriate given the nature of a mentoring role and we are legally permitted to do so. If it is appropriate and legal, this information may be collected as part of the contract for services but may also be provided to us directly by you in the course of you delivering an agreed service for us.

We have a legitimate interest for processing criminal offence data and is further authorised to process this data under the Data Protection Laws. The key reason behind this authorisation is:

* To determine, without discrimination, your initial and continued suitability for delivering the contract for services.
* To ensure compliance with your statutory rights.
* To ensure effective HR, personnel management and business administration.
* To comply with legal requirements.

We collect and process information about criminal convictions for the above purposes relying on one or more of the following lawful grounds: your consent or to protect your vital interests (or someone else’s interests) when you are not capable of giving your consent; where you have already publicised such information or where we need to use such information in connection with establishment, exercise or defence of actual or potential legal claims.

**Communications for marketing**

We may use your contact details to provide you with information about our work, events, services and/or products which we consider may be of interest to you (for example, about services you have previously used)

Where we do this via email, SMS or telephone, we will not do so without your prior consent.

Where you have provided us with your consent previously but do not wish to be contacted by us about our services in the future, please let us know by email at empoweringfamiliesuk@gmail.com

**Children’s personal information**

When we process children’s personal information, where required we will not do so without their consent or, where required, the consent of a parent/guardian. We will always have in place appropriate safeguards to ensure that young people’s personal information is handled with due care.

Personal information of children which has been collected, and which causes reasonable concern for the child’s safeguarding, is processed and managed in accordance with our safeguarding policy.

**How long do we keep your personal information?**

We keep your personal information in line with our Data Retention Policy and we will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

With appropriate justification, documentation can be retained for longer than the suggested retention periods in our Data Retention Policy, but will be regularly reviewed thereafter and destroyed as soon as it is no longer required (as set out below).

At the end of the relevant retention period, your information will either be securely and confidentially destroyed or anonymised. Anonymisation is the process of either encrypting or removing personal information from data sets, so that it is not possible to identify individuals from the data.

You have a right to ask us to delete personal information (right of erasure) we hold about you in some circumstances, for example, where it is it is no longer required for processing, you no longer consent to the processing or where you object to processing. If you validly exercise your right of erasure, we will delete or anonymise your personal data.

If you request to receive no further contact from us, we will keep some basic information about you in order to comply with your request and avoid sending you unwanted materials in the future. Third party processors will be required to provide sufficient guarantees for their data security measures and compliance with them. Checks will be made to ensure that secure data disposal facilities are in place and regular monitoring will take place

**Will we share your personal information?**

We do not share, sell or rent your personal information to third parties for marketing purposes.

**Data Security**

We have put in place appropriate measures to protect the security of your information and we have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

**Your rights to your personal information**

Under certain circumstances, you have rights under data protection laws in relation to your personal information:

* **Request access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
* **Request erasure**of your personal information. This enables you to ask us to delete or remove personal information in certain circumstances e.g. where it is no longer necessary for us to retain it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* **Object to processing**of your personal information where we are relying on the legitimate interest basis (or those of a third party) or where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal information which override your rights and freedoms.
* **Request restriction of processing** of your personal information in certain circumstances.
* **Request the portability**of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
* **Withdraw consent at any time** where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you decide not to provide us with your data or to withdraw consent (where we are relying on consent to process your personal information), we may not be able to provide certain information or services to you.

If you wish to exercise any of these rights, please contact us via email on empoweringfamiliesuk@gmail.com. You usually will not have to pay a fee to access your personal information (or to exercise any of the other rights above). If requested, we will provide you with a copy of your personal data undergoing processing. This will be in electronic form, unless you agree otherwise. If you want additional copies of your personal information, we may charge a fee, which will be based on the administrative cost to us of providing the additional copies. We may also charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. A request is likely to be manifestly unfounded or excessive where it repeats a request to which we have already responded.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We will normally respond to all legitimate requests within a period of one month from the date it is received. Occasionally it may take us longer than one month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

For more information about your rights or if you are not happy with the way your information is being processed or our response to a request, you can contact the Information Commissioner’s Office (ICO) – for more details, see [https://ico.org.uk/.](https://ico.org.uk/)

**Changes to this Policy**

We will review this policy annually.

**How to contact us**

Please let us know if you have any questions or concerns about this Policy or about the way in which Empowering Families processes your personal information by contacting us via the following channel:

empoweringfamiliesuk@gmail.com