

1. PURPOSE

This privacy policy has been created to let you know how we use, share and store your personal information. Along with information about the rights you have in relation to the information we hold on you and the legal basis on which we are using it.

2. SCOPE

This policy applies to the Coalfields Regeneration Trust (CRT) and our subsidiary companies.

3. INTRODUCTION

The Coalfields Regeneration Trust (the group) is committed to data security and the fair and transparent processing of personnel data. Whenever you provide us with personal information we will treat your information in accordance with the law and this privacy policy. In particular we will:

- Collect information fairly
- Let you know how we will use it
- Keep your information secure

4. HOW DO WE COLLECT INFORMATION?

We collect and process personal data about you when you interact with us. This can be:

- Information you provide by filling in forms on our website or signing up to newsletters;
- Information you provide when enquiring in writing or verbally about our services / programmes / properties;
- Information you provide when using our services/programmes. For instance:
 - In applications for funding
 - When signing up to our organisational support service
 - When registering for a sports activity we deliver
 - When participating in one of our health, wellbeing & skills services
 - When registering for training
 - When taking part in an activity delivered at one of our Hub Houses
 - When referring others to one of our services
- Information we receive in correspondence that you send to us. For instance:
 - A recruitment application
 - A tender
 - A partnership opportunity
 - In response to a volunteering opportunity
- Information you provide when entering into a contract with us to:
 - become a provider for us
 - become a tenant

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- Information you provide when taking part in one of our steering groups;
 - Information you provide during partnership working;
 - Information you provide when joining one of our mailing lists;
 - CCTV images if you visit our Head Office or other properties with CCTV;
 - Photos/videos taken at events we deliver or taken to publicise our work;
 - Information you provide when completing a customer/stakeholder feedback survey/consultation or;
 - Information you provide when posting material on our social media accounts.

We also obtain information from publicly available sources for instance MP contact details from Parliament website.

5. WHAT INFORMATION DO WE COLLECT?

What information we collect can depend on how you have interacted with us. The personal information we mainly collect and process is:

- Your name
- Your home or work address, email address and/or phone number (landline/mobile)
- Your job title
- Your payment details, if you donate money to us.
- Photos/videos taken at events we deliver

If you are requesting funding or becoming a provider or supplier we will also collect:

- Your bank account details.
- Details of your management committee (where requesting funding)

Some sensitive and criminal data is captured for recruitment purposes, SQA training and our health, wellbeing and skills services. This data is securely stored and has restrictive access. We ensure all the data you provide remains confidential.

Our health, wellbeing and skills services use the information to provide you with the tailored support and to measure your progression.

SQA training uses the information you provide to determine if you are entitled to help or free courses.

N.B. Please note this list is not exhaustive and includes any other information you provide.

6. WHAT LEGAL BASIS DO WE USE TO PROCESS YOUR INFORMATION?

- We use **consent** to process information obtained through:
 - Funding applications (second contacts)
 - Joining mailing lists
 - Subscribing to newsletters
 - Taking photos/videos
 - Producing case studies/good news stories

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- Enquiries
 - Joining our WhatsApp Communities

We will not use your information in a way that would identify you personally, except where you have provided consent for your information to be used for a specific purpose.

If you give us explicit permission to do so we may send your name and contact details to third parties whom we consider might have services/products you would find useful.

We will continue to process your information until you remove your consent or you reach the end of the service.

- We use the **legitimate** legal basis to process information obtained through:
 - Job/Volunteering applications
 - Tenders
 - Tenancy
 - Funding applications (main contact and details of committee members)
 - CRT Support
 - Health, wellbeing & skills services e.g. Game On
- **Legal Obligation** - We are subject to the law and sometimes must process your information in order to comply with statutory obligation.
- We use **contract** as a legal basis where personal data is processed to comply with our obligations under the contract e.g. collect rent, inform providers of invoice payments, and retain grant records.

N.B. Please note these lists are not exhaustive.

7. HOW DO WE USE YOUR INFORMATION?

- **Visitors to our website**

When someone visits <https://www.coalfields-regen.org.uk> a proactive approach to user privacy and ensuring the necessary steps are taken to protect the privacy of its users throughout their visiting experience is taken.

- **Use of Cookies**

The website uses cookies to better the experience whilst visiting.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and

monitor your engagement and usage of the website but will not store, save or collect personal information. You can read [Google's privacy policy](#) here for further information.

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

- **Search engine**

We use a third party service to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the website.

- **External Links**

Although our main website only looks to include quality, safe and relevant external links users should always adopt a policy of caution before clicking any external web links mentioned throughout this website.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. You should therefore note you click on external links at your own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

- **Security and performance**

We use a third party service to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the website.

- **Enquiries**

We use personal data collected from enquiries to send you the information you have requested and sometimes to monitor the interest our services/programmes have received.

- **Mailing Lists / Newsletters**

The information you supply when signing up to our newsletters or mailing lists is used to email you the information you have asked to be sent. For instance emails about: specific Trust programmes, Trust events, training opportunities, information we think you might find useful given what we know about your organisation/group, networking opportunities etc.

All emails are sent using Blind Carbon Copy (Bcc) to ensure your contact details are not shared with external parties.

- **Customers (Applicants/Clients/Learners etc.)**

Personal information supplied for a service, programme, course or activity we deliver is used by us or third parties (where outsourced) to:

- contact you about the service / programme / course / activity
- bespoke the service to your needs e.g. CRT Engage, CRT Together
- register you with a training supplier (where outsourced), the Scottish Qualifications Authority (SQA) or Sports Leaders; where you have signed up for a training course
- award funding (where applicable)
- provide development support to organisations (where applicable)
- deliver and monitor the service / programme / course / activity

- **Other ways we use your information**

- Process a donation you have made
- Process a job/volunteering application
- Process a tender or provider application

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- Respond to correspondence you sent us
 - To create leases and contact you about your tenancy (CRT Property Investments Ltd)
 - To create publicity

N.B. Please note these lists are not exhaustive.

8. CHILDREN

We do deliver some services to young people. If you are under 13, please make sure you have your parent's/guardian's permission before you provide us with any personal information. Our forms have sections for you to obtain this permission. You must not provide us with personal information without this.

9. DISCLOSURE AND SHARING OF YOUR INFORMATION

We will never sell your personal data and will keep it confidential.

We may share your information in order to provide services to you, but shall obtain your consent before doing so.

However there are circumstances under which we may need to disclose data without explicit consent for that occasion.

These circumstances are strictly limited to:

- Where required by law.
- Data disclosed to authorised recipients related to education and administration necessary for us to perform our statutory duties and obligations.
- Registering learners onto training courses or with the Scottish Qualifications Authority or Sport Leaders; where you have signed up for a training course.
- Data disclosed to authorised recipients in respect of their child's health, safety and welfare.
- Learner data disclosed to parents in respect of their child's progress, achievements, attendance, attitude or general demeanour.
- Staff data disclosed to relevant authorities e.g. in respect of payroll and administrative matters.
- Where you are a tenant in a property managed by external agent.
- Unavoidable disclosures, for example to an engineer during maintenance of the computer system. In such circumstances the engineer would be required to sign a form promising not to disclose the data outside the Trust.
- Data disclosed to send agreements/contracts/forms for e-signature.

Only authorised and trained staff are allowed to make external disclosures of personal data. Data used within the Trust by administrative staff will only be made available where the person requesting the information is a professional legitimately working within the Trust who needs to know the information in order to do their work. The Trust will not disclose anything on learner/customer records

which would be likely to cause serious harm to their physical or mental health or that of anyone else – including anything which suggests that they are, or have been, either the subject of or at risk of abuse. Where there is concern of abuse the safeguarding policy will be followed.

10. DATA MAY BE PROCESSED OUTSIDE THE EUROPEAN UNION

We may use WhatsApp to give announcements on changes to our activities e.g. Football 5ives session cancelled. WhatsApp does store data in the USA however we do not collect personal data this way but a name and phone number are required to create a WhatsApp account, if you do not already have one. Individuals are made aware of where guidance on security and permissions can be found prior to signing up and announcements are also shared via other means.

11. HOW LONG DO WE KEEP YOUR INFORMATION?

Data held about individuals will not be kept for longer than necessary. Documentation will be retained and disposed of in accordance with the Trust's Retention Policy which is available upon request.

The retention period of records will be dependent on the relevant statutory, contractual, financial and operational requirements. Where there is a conflict between these requirements the one with the longest retention period and which meets legislation shall be adhered to.

Where processes/services are being delivered externally by third parties, we will ask them to safely destroy or return to us, any personal information they have received when we believe it is no longer required. For instance external tutors will be asked to return all learner records once the learner has finished/left the course.

12. HOW WE WILL SAFEGUARD YOUR INFORMATION?

The Trust undertakes to ensure security of personal data by the following general methods:

- Procedural security
- Logical security
- Physical security

Further information is provided in our Data Rights Policy.

Where information is shared with third party providers, you will be informed and we will have contracts in place with the providers to ensure they comply with data protection. We will also perform checks where necessary to ensure they have appropriate safeguards in place.

13. YOUR RIGHTS

• Access

You have the right to access your personal information at any time. All requests must be made in writing on a Data Subject Access form, which can be obtained from any member of staff. Once we receive a written request it will be dealt with in a timely manner.

• Edit

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

- **Erasure**

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

Where possible we can remove/delete any personal identifiable information that we hold. However, where a service is funded by an external party we may need to keep this information to comply with the funding agreement.

All of these rights are supported by our Data Rights Policy.

When we receive any request to access, edit or delete personal information we will take reasonable steps to verify your identity before granting you access or taking any other action. This is important to safeguard your information.

You also have the right to:

- **Object**

You have the right to request that we stop processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

- **Ask us to stop contacting you with marketing**

You have the right to request that we stop contacting you with direct marketing. On mailing list/newsletters emails we provide details on how to 'unsubscribe' which will unsubscribe you from that mailing service.

- **Complain**

You can make a complaint to us by contacting send a letter to our Head Office marked for the attention of our CEO and copied to our Quality Assurance Co-ordinator.

You can also make a complaint to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office.

14. CONTACT DETAILS

If you have any queries about this policy or need further information you can use the details below to contact us.

Quality Assurance Co-ordinator
The Coalfields Regeneration Trust
1 Waterside Park
Valley Way
Wombwell
Barnsley
S73 0BB

15. CHANGES TO THIS PRIVACY POLICY

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website or Trust services.