

# Salford CVS Full Privacy Notice

## About Us

Salford CVS is the city-wide infrastructure organisation providing support for the voluntary, community and social enterprise sector (VCSE). Our support services include providing specialist information, advice and development support.

We are incorporated as a Company Limited by Guarantee (registration number 1948293) and registered as a Charity (registration number 519361).

Salford CVS is registered with the Information Commissioners Officer (registration number Z6689753) and you can find out more about work through the about us section of our website

Further information about our work can be found in the [about us](#) section of our website.

## What data do we collect?

A large majority of our work is supporting VCSE organisations but we do also support individuals and volunteers through the work of our development team, volunteer centre and specific projects. This means we hold a range of personal data including:-

- personal information (such as name, employee or teacher number, national insurance number)
- characteristics information (such as gender, age, ethnic group)
- contract information (such as start date, hours worked, post, roles and salary information)
- Employment related information (such as job applications and Human Resources Information e.g. qualifications, sickness absence, working hours)
- Payment Details ( including individual payroll details as well as individual payment and donation information)

## How do we collect your information?

Salford CVS collect your personal information from a range of contact points including paper based forms, telephone and the Salford CVS website. Each collection point contains a brief privacy notice relating to its specific use and signposting to this overall statement.

## What do we do with your information?

The data we collect and how we use it depend on which of our services you have accessed. These sections will be made available to individuals when they sign up to use those services. Further details on each service can be accessed below or by clicking the link to the appropriate service.

1. Salford CVS Membership
2. Development Team Support
3. Salford CVS Volunteer Centre
4. Salford CVS Administered Grants Programmes
5. Little Hulton Big Local
6. Salford CVS Training and Events
7. Disclosure and Barring Service (DBS)
8. Salford CVS Payroll Services
9. Salford CVS Mailing Lists
10. Salford CVS Website
11. Research and Monitoring
12. Photography
13. Staff and Volunteers

## Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. Depending on the service you are accessing these will change. We consider the following grounds to be relevant:

- Specific Consent - Where you have provided specific consent to us using your personal information in a certain way, such as to send you email or newsletter
- Performance of a contract – To enable us to provide products or services to you such as our development team support or receiving grant.
- Legal obligation - Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example as part of our payroll services we have to legally provide information to HMRC.
- Vital interests - Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue which requires us to share your information with the emergency services.
- Legitimate interests - Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights). Example of this include:
  - Sending you specific related opportunities or events such as new funding or training opportunities.
  - Letting you know about research we conducting to help us improve our services or the lives of people in Salford.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our own interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route that is lawfully available (for example, if we need to process

it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

### **Who do we share your information with?**

Salford CVS will only share information with those that need to know it. Further information on who we share information with is within each service area.

We do shared anonymised statistical information and case studies with our funders and commissioners including Salford City Council and Salford CCG – no personal individual can be identified from this data.

Personal information will only be shared with those that need to know it in order to complete our service to you. Examples of this include processing DBS applications, our payroll services and specific projects and services.

Where your information is being shared it will stated clear at the point of collection whether that is a paper based form or through our website.

If you have any queries regarding if your data is shared and the sharing processes we undertake please speak to the member of staff you are working with or alternatively contact Kirsten Blackwood [data@salfordcvs.co.uk](mailto:data@salfordcvs.co.uk)

### **Additional Information sharing**

Your information may also be shared with other people and organisations where the organisations are required by law to do so or with appropriate justification under the Data Protection Act (2018), for example where the disclosure is necessary to a public body or another organisation to exercise its statutory functions. Examples of this include the sharing of data with HMRC regarding payroll functions or where we have a duty of care such as a safeguarding concern.

### **Detection and prevention of fraud or crime**

By law we are required to protect public funds that we are responsible for (e.g. our grants programme). This means we may also use any of the information you provide to prevent and detect fraud. This may involve sharing this information with organisations responsible for auditing or administering public funds including the local authority and the clinical care commission.

When necessary and appropriate information held will be shared with organisations such as the Police to prevent or detect crime, apprehend or prosecute offenders or prevent the risk of harm to an individual e.g. safeguarding.

### **What do we do to make sure your information is secure?**

We take our obligations under to look after your data very seriously. The information you provide will be subject to rigorous measures and procedures to make sure it can't be seen, accessed or disclosed to anyone who shouldn't see it.

All staff that can see your information will have undergone specific training around how to handle information properly and have to comply with Information technology and data protection policies and procedures. These set out how your information is protected.

Relevant paper based information is processed only by the relevant members of the Salford CVS team and kept securely within our Salford office. Additionally we have self-assessed our IT systems and they meet the current requirements of the governments Cyber Essentials Schemes. Also access to your information is password protected to unique staff accounts and access is limited by the role of the person. This means if they are not the appropriate person they will not be able to see your information.

### **Transfer of data outside of the European Union**

Salford CVS main data based in hosted in the UK and technical our main support contract are provide by a UK based organisation. We may on occasions utilise contractors that are based outside of the European Union for technical support but we guarantee not to move your data out of the UK.

### **How long will you hold onto my information?**

Information has to be kept for different lengths of time that is often dictated either by law or funding terms and conditions. This can vary from 1 year up to 75 years. Your information will be held for the minimum length of time that these various law and legal regulations state they must be held for.

Where laws do not specify how long information must be kept for the organisation will use recommendations from legal advisors and how long other specialists in the organisations decide it is necessary to keep it for. All decision that are not based on legal requirement have to be explained.

Due to the many different types of information that are used by Salford CVS it would not be practical for us to list all of them and the periods they will be held for here. However if you wish to know the length of time particular information regarding yourself or your organisation is held please contact Salford CVS for further information.

### **What are my rights of access to my information?**

You have the right to ask for access to any of the personal information that Salford CVS hold about you. If you want to ask for this information please contact our data protection lead – Kirsten Blackwood [data@salfordcvs.co.uk](mailto:data@salfordcvs.co.uk)

### **Your Right to Complain / Object**

You have the right to complain if your feel your information is not being used in the right way. To begin with it may be better to speak with the member of staff that is working with you to talk through your concerns.

If you do not want to do this details of our complaints procedure can be found [here](#)

Alternatively you can simply contact our data protection lead – Kirsten Blackwood [data@salfordcvs.co.uk](mailto:data@salfordcvs.co.uk) / 0161 787 7795

If you are still not satisfied with your response from Salford CVS you also have the right to raise a complaint with the Information Commissioner's Office. For further details on this and your information rights please visit the Information Commissioner's Office Website [HERE](#)

## **Changes to policy**

Salford CVS will review this statement on a regular basis and the updated document will be made available on our website.

## **What do we do with your information? (Services)**

### **Salford CVS Membership**

Salford CVS is a membership organisation. Membership is only open to voluntary, community and social enterprise organisations. The above is considered by Salford CVS to be business contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information.

The information provided enable us to administer our membership service offer including keeping organisations and groups informed about our services as well as news, events and activity that effects them and their work.

### **Development Team Support**

Development Team Support is provide to VCSE organisations within Salford. As a result a large amount of the data we handle is considered by Salford CVS to be business contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information. The information provided enables us to deliver and monitor our services to groups.

We do record details of the support we give through our referrals process including the nature of the support, how we have helped, what the outcome was etc. Although the majority of this information is about the organisation we may also be occasionally given personal information. Our case files are kept securely on our CRM system. The system is password protected and access to that section is limited only to staff involved in providing development support. Our files are kept for a minimum of seven years to meet our legal and funding obligations.

Our core development work is funded through Salford City Council and we provide statistical information and case studies to them regarding the delivery our services. This information is anonymous and no individuals can be identified from it.

## *Safeguarding Support*

Salford CVS provide safeguarding support to organisations within Salford this includes dealing with potential disclosures, complaints and allegation. Due to the nature of this information we may share it with a range of partners to ensure the safety and wellbeing of the individuals concerned and to fulfil our legal obligation. This may include the Salford City Council, the Police and depending on the nature of the allegation the Charities Commission.

We do not keep electronic records of our safeguarding support and hard copies are currently kept securely within our office with only the relevant staff able to access them. At present these records are kept indefinitely in line with professional advice and guidance given from the Salford Safeguarding Board.

## **Salford CVS Volunteer Centre**

### *For Organisations / Volunteer Managers*

In order to use our volunteer centre services (including our online portal) organisations are required to register for an account with the volunteer centre and provide a named lead / volunteer manager. The above is considered by Salford CVS to be Business Contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information. The information provided enables us to deliver and monitor our volunteer services (including training, support and brokerage) to groups.

### *Volunteers*

We collect a range of information to enable us to provide the best possible service and volunteering experience for you. Personal information collected includes:

- Personal contact information (such as name, address, telephone and email address)
- Demographic characteristics information (such as gender, age, ethnic group)

Demographic data is classed as “special categories of personal data “and this is optional to complete.

We use your data in four key ways:-

- Brokerage service - Your contact details will be used to communicate with you about volunteering opportunities, particularly those that you have expressed an interest in or chosen to pursue. Information is recorded and retained in order to fulfil the organisational and contractual objective of matching local people with volunteering roles.
- Monitoring our service - Special Categories of personal data are collected in order for us to understand the demography of people who are interested in volunteering in the local area. This information is collated into an anonymised report which may also be shared with our funders (Salford City Council). This data is optional and you can choose not provide this data when registering.

- Information relating to the work we carry out with you including content of emails, volunteering roles you enquire about and are placed with is also stored to help us to monitor our service.
- As mentioned above you have the right to access any information we hold you (hyper link back to the policy section) and if you have provided this information but would like it to be removed, please let us know.
- Sharing data - Individual contact details may be shared with a third party namely a local volunteer involving organisation in order to facilitate the brokerage of a volunteering role. This will only happen once you have given consent for your information to be shared. The information that is shared will be no more than the information provided on your original registration. Consent is obtained when you sign up with the Volunteer Centre and information is only shared with organisations you have actively expressed an interest in either in person or via our volunteer portal.

As mentioned above Statistical Data regarding the volunteer centres services is also provided to our main funder Salford City Council. This data is anonymous and no individuals can be identified from these reports.

Staying in touch - From time to time we send out information on the Volunteer Centre, this includes new opportunities, events and volunteering news. To receive this information you must opt into our mailing lists when you register with us or you can let us know subsequently by email or phone.

### *Do-It*

Salford CVS utilise Do-It (<https://do-it.org/about/privacypolicy>) to additionally promote opportunities and recruit volunteer for some organisations. Organisational data as per our own volunteer centre portal is considered business contacts and personal information. Individual data we received from Do-It is treated as per our own volunteer information above.

## Salford CVS Administered Grant Programmes

### *Online Grant Portal - Organisations*

In order to apply for our organisational grants online organisations are required to register for an account with Salford CVS and provide key organisational details including contact details. The above is considered by Salford CVS to be business Contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information. The information provided enables us to deliver and monitor our grants programme.

### *Grant Applications – Organisations*

In order to apply for a grant via Salford CVS we are required to ask for key contact information. We appreciate that this may be on occasion personal information.

We require this information to provide this service and to meet our legal and contractual obligation as a funder. We will also use this information to communicate

with you about your grant with us and related funding opportunities. How long we keep this information depends on our funder but this is usually for a minimum of seven years.

We will share information about your organisation and its activities to the funder of the programme (e.g. NHS Salford CCG). However, no personal information will be shared. The details of the funder are advertised with each programme and in the grant terms and conditions.

We will share information about the organisation and the grant to be published online (on our website) and shared with 360 Giving. [www.threesixtygiving.org](http://www.threesixtygiving.org) No personal or contact information is shared through this process.

As part of our grants terms and conditions you are required to assist in the evaluation of the programme. A selection of applicant are selected annual to support this process. This means that is selected your contact details provided will be shared with programme evaluation – currently CLES (<https://cles.org.uk/>). For further information about the grants evaluation process please do not hesitate to contact us.

### *Ambition for Aging*

Salford CVS currently delivery the Ambition for Aging investments in partnership with Salford Age UK and Inspiring Communities Together. As part of this process we receive application details from Age UK to enable us to process payments and purchase equipment for VCSE groups and organisation. For un-constituted groups this may include personal contact details. Your information is only used to enable us to complete this service and for legal and audit purposes is usually retained for a period of seven years.

### *Little Hulton Big Local*

Salford CVS is the local trusted organisation for Little Hulton Big Local. This means that although it makes its own decision as an organisations its staff are employed by us and it forms part of our broader work as a charity and its staff follow the information within this privacy notice.

### *Big Local Grants*

In order to apply for a grant we are required to ask for key contact information for groups and organisations. We appreciate that this may be on occasion personal information particular as we fund a number of un-constituted groups. We are committed to ensure your data is treated with the same processes and security as we do personal information.

We require this information to provide this service to you and to meet our legal and contractual obligation as a funder. We will also use this information to communicate with you about your grant with us and related funding opportunities. Due to financial and legal obligation we will keep your information for a minimum of seven years.

We will share information about your organisation and its activities to the funder of the programme (i.e. Big Local). However, no personal information will be shared.



We will share information about the organisation and the grant to be published in our annual reports and online (on our website) and shared with 360 Giving. [www.threesixtygiving.org](http://www.threesixtygiving.org) No personal or contact information is shared through this process.

### Salford CVS Training and Events

When you register to attend an event we will collect contact information this may be on a booking form, over the telephone or on an online form.

Depending on the event we will collect information that will enable us to contact you with information relating to the event and ensure that any special needs are provided for. This may include:

- Your Name
- Your email address
- Your phone number
- Any access or mobility issues
- Any dietary requirements

Data will be used to communicate with you about the event you are booking into only. This will include sending confirmations, joining instructions and post event feedback requests.

Your details may be shared in advance with the trainer / facilitator of the event to ensure the best possible course delivery. We also produce statistical reports on our training and events programme using feedback and evaluation forms which are shared with key funders and partners including Salford City Council, training providers and in the case of Information Governance Training (GMCA). Your personal details will not be shared with anybody else for marketing or promotional purposes without your prior consent.

Any hard copy booking forms are securely disposed of once data has been transferred onto our database system. Data relating to our training and events programme is kept for 12 months to enable event administration and to enable the competition of annual reports.

### Disclosure and Barring Service (DBS)

#### *For Organisations*

Data about organisations using our DBS service includes named people within the organisation who carry out the role of evidence checker. This data is collected when organisations sign up to use our services. The above is considered by Salford CVS to be business contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information.

#### *For Applicants*

In our role as a DBS Umbrella body, personal data about individuals is processed on behalf of the Disclosure and Barring Service. As a registered umbrella body with the DBS we follow the [DBS code of practice](#) which outlines and ensures the safe and effective processing of data including its collection, retention and storage.

The only information Salford CVS keeps regarding your application is your name, date of birth, your organisation, job title and the tracking details of your application – DBS form number and postal services reference. This information is required for us to provide an effective service to you and to enable us track your application as it is processed by the Disclosure and Barring Service. We do not keep copies of your application or the supporting information.

If you are an applicant who we have processed a DBS check for and you have a query about how the data submitted to the Disclosure and Barring Service is used please visit the DBS directly for more information (<https://www.gov.uk/government/collections/your-data-and-how-we-use-it>)

## Salford CVS Payroll Services

### *For Organisations*

Data about organisations using our Payroll service includes named people within the organisation who act as the lead within the organisation and provide the relevant information for the competition of this service. This data is collected when organisations sign up to use our services. The above is considered by Salford CVS to be business contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information. Through the process of signing up to use our service organisations sign a Data Processing Contract with us outlining our commitment to our obligations as a data processor.

### *For Individuals*

In order to complete our role as a payroll service we are required to process personal data about individuals on behalf of customers (organisations). Collection, retention and storage of this data are covered under the Data Processing Contract in place with each customer / organisation.

If you are an employee / data subject who we have processed personal data on for an organisation (processed payroll for) and you have a query about how this data is used please contact the organisation directly. Salford CVS will comply with any requests from your organisation in relation to your individual rights but can only act on the written request from your organisation.

Salford CVS holds personal data on payroll services employees in order to process payroll, it's obligation in relation to paying National Insurance, PAYE and Pension and keep relevant employment records. Payroll information is stored electronically and has restricted access to the staff delivering the service and Salford CVS Senior Management. All records are retained for at least the minimum period required by law.

Information to process Payroll is shared with our Payroll provider ([Quick Books](#)) with whom we have a intend to have a data processing contract in place in time for the GDPR enforcement date of 25th May 2018

### Salford CVS Mailing Lists

Salford CVS operates a number of thematic mailing lists for a number of purposes e.g. our VOCAL mailings. Some of these are sent to our members and to organisations as part of our services deliver whilst others are also open to individuals.

Where mailings are to organisations and members then this information is considered by Salford CVS to be Business Contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information.

When an individual signs up to a mailing list they will receive a confirmation request email to confirm their subscription. Our mailing lists are never shared or sold with any third party and we make sure that everything we send is relevant to our work including our support offer to organisations.

If you no longer wish to receive a specific mailing all our mailings contain an unsubscribe option to enable people to stop receiving them at any time or alternative contact [data@salfordcvs.co.uk](mailto:data@salfordcvs.co.uk)

### Salford CVS Website

Like many organisations our website is a key tool in providing services to you and as a result it does process a range of personal identification in order to provide you with a positive experience and service. For further details of the information our website collects please visit our [specific website privacy notice](#)

### Research and Monitoring

We will use the information you provide to:

- analyse statistical data so we can plan how we provide services;
- create anonymised data to help improve services and to be published in various reports that will also be publically available.
- create anonymised reports for our funder and commissioners to demonstrate effective delivery and to enable us to continue service delivery.

By anonymising the data that is used in this way it means that it will not contain any personal information. So you, your family or any individual person cannot be identified from this information.

As Salford CVS we also periodically conduct a range of research programmes and projects – the full details of how this information will be used will be include in specific project privacy notices.

## Photography

Salford CVS recognises that a photograph where an individual is uniquely identifiable is categorized as a “special category of personal data”. Photographic consent is collected during both event registration and event sign in processes. We also have processes in place to ensure your photograph is not taken if you object / don't want it to

Photographs/video taken and any reproductions may be used by Salford CVS for any advertising purposes or for the purposes of illustrating wording. The photographs/video may be used in promotional material including, but not limited to, promotional flyers, website, posters, social media and display boards, with any reasonable retouching or alteration.

If you wish to withdraw your consent you may do so at any time by contacting Salford CVS.

Photographs are stored on the Salford CVS server and IT systems and access is restricted to only relevant Salford CVS staff and volunteers.

## Staff and Volunteers

### *Salford CVS Staff*

Salford CVS holds personal data on its employees in order to process payroll, it's obligation in relation to paying National Insurance, PAYE and Pension and to keep employment records. Employee records are stored both electronically in password protected documents and in hard copy. In both cases this data is accessible to the Salford CVS Senior Management and can be made available to the Salford CVS trustee board as appropriate. All records are retained for at least the minimum period required by law.

Information to process Payroll is shared with our Payroll provider ([Quick Books](#)) with whom we have a intend to have a data processing contract in place in time for the GDPR enforcement date of 24th May 2018

Information that enables us to provide the Workplace pension is shared with our Pension Provider NEST. Details of their commitment to data protection legislation and privacy can be found online [here](#)

### *Salford Volunteers including trustees*

Salford CVS values its volunteers (including its trustees). Volunteer records are kept and retained in the same manner as our employee records.

Volunteer records are stored both electronically in password protected documents and in hard copy. In both cases this data is accessible to the Salford CVS Senior Management and can be made available to the Salford CVS trustee board as appropriate.