

**Privacy Notice**

**Introduction**

This document explains how we, Comics Youth CIC serving children and young people in the Liverpool City Region, use data about individuals.

At Comics Youth CIC, we are committed to maintaining the trust and confidence of the people we work with. In particular, we want you to know that we are not in the business of selling, renting or trading email lists. In this Privacy Policy, we’ve provided detailed information on when and why we collect your personal information, ho we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

Individuals have a legal right to be informed about how our organisation uses any personal information that we hold about them. To comply with this, we provide a ‘privacy notice’ to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about children and young people who participate in our various youth activities/projects. We, Comics Youth CIC, Centre 63, Old Hall Lane, L325TH, are the ‘data controller’ for the purposes of data protection law. Our data protection officer is Jhe Taylor-Brown (see ‘Contact Us’ below).

**Types of data we collect**

We collect and hold data on our Directors, staff, young people we work with and youth clubs/organisations we support.

This data includes:

* Names, addresses, e0mails, phone numbers, date of birth and emergency contact details.
* Photos and video’s
* Banking details and tax information

**Appendix 1** lists of what kind of information is held, the legal reason why we hold it, where we hold it and for how long.

**The personal data we hold**

We hold some personal information about children and young people and their parents/carers in order to provide accessible, appropriate and safe activities.

This information includes:

• Contact details

• Date of birth and gender

• Next of kin and emergency contact details

• Details of any behaviour issues

• Safeguarding information

• School information

• The name and address of the family GP

• Photographs

We may also collect, store and use information about that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

• Race, ethnicity, sexual orientation and religious beliefs

• Health, including any medical conditions and medication currently being prescribed

**Google Analytics**

When someone visits [www.comicsyouth.co.uk](http://www.comicsyouth.co.uk) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to find out things such as the number of visitors to the various parts of the site.

This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

**Mailing lists**

As part of the registration process of our e-newsletter, we collect personal information. We use that information to tell you about stuff you’ve asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you’re happy and satisfied.

We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see MailChimp’s privacy notice. You can unsubscribe to general mailings at any time by emailing our data protection officer Jhe-Taylor Brown at [jhe@comicsyouth.co.uk](mailto:jhe@comicsyouth.co.uk)

**Our legal basis for using this data**

We only collect and use your personal data when the law allows us to. Most commonly, we process it where:

• Fulfil a contract we have entered into with you

• We have obtained consent to use it in a certain way

• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example:

* Funders may be provided with information on the numbers of children and young people within a certain age range participating in activities to show appropriate use of funds;
* Information relating to numbers of young people within certain minority groups may be used to demonstrate a need for targeted projects.

Less commonly, we may also use personal data in situations where:

• We need to comply with a legal obligation

• We need it to perform an official task in the public interest

• We need to protect your interests (or someone else’s interests)

Where we have got permission to use your data, children and young people (or parents/carers where appropriate) may withdraw this at any time. We will make this clear when we ask for permission and explain how to go about withdrawing consent.

Some of the reasons listed for collecting personal data overlap, and there may be several grounds which justify our use of this data.

**Why we use this data**

The purpose of processing this information is to help us ensure children/young people are safe to participate in activities they enjoy, this includes:

|  |  |
| --- | --- |
| **Purpose** | **Legal basis** |
| Getting in touch with parents/carers when we need to | Contract and Legitimate interests |
| Looking after the wellbeing of children and young people participating in activities | Contract and Legitimate interests |
| Complying with health and safety obligations, completion of accident book and RIDDOR reporting | Legal obligation and Legitimate interests |
| To provide activities that are fun, safe and of interest to the children and young people engaging in them | Contract and Legitimate interests |
| To participate in organised trips and events | Contract |
| Promoting the organisation on the website and social media pages | Consent |
| To provide evidence of appropriate use of funds to funding bodies | Legitimate interest |
| To undertake research and evaluations to influence future activities/projects | Consent and Legitimate interest |

**Collecting this information**

We collect personal data by a variety of means. We collect most information when you register for an activity. However, additional information may be collected during the course of the activity/project. We may need to collect additional personal information that is not currently identified on the above list but before doing so we will provide you with a written notice setting out details of the purpose and the lawful basis of why we are collecting that data, its use, storage and your rights. While in most cases you must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it’s optional. If you must provide the data, we will explain what might happen if you don’t.

**How we store this data**

We keep personal information about you (your child) while you (your child) are participating in our activities/projects. We may keep it longer if this is necessary in order to comply with our legal obligations. Information is kept in accordance with guidelines in the Information and Records Management Society’s toolkit for schools. The personal data we collect may be held as an electronic record on secure data systems or as a paper record in locked filing cabinets. The records are only seen by those who need the personal data so they can do their job. The security of the data follows Comics Youth CIC’s Data protection policy.

**Data sharing**

We do not share personal information about you with anyone outside the organisation without consent, unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information with:

* Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
* Your family and representatives
* Our regulators e.g. Companies House etc.
* Suppliers and service providers – to enable them to provide the service we have contracted them for
* Central and local government
* Health authorities
* Police forces, courts, tribunals
* Professional bodies

In certain circumstances, this information may be shared even if the child/young person is no longer accessing our activities/projects.

Transferring data internationally In the unlikely event that we need to transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

**Your rights How to access personal information we hold about you**

You can find out if we hold any personal information about you, and how we use it, by making a **‘subject access request’**, as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

• Give you a description of it

• Tell you why we are holding and using it, and how long we will keep it for

• Explain where we got it from

•Tell you who it has been, or will be, shared with

• Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)

• Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

You are entitled to view, amend, or delete the personal information we hold. If you want to make a request, please contact our data protection officer.

**Your other rights over your data**

Unless subject to an exemption under the GDPR, you have other rights over how your personal data is used and kept safe, including the right to:

• Say that you don’t want it to be used if this would cause, or is causing, harm or distress

• Stop it being used to send you marketing materials

• Say that you don’t want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)

• Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it

• Withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data

• Claim compensation if the data protection rules are broken and this harms you in some way

If you wish to exercise any of these rights, please contact our data protection officer.

**Complaints**

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we’ve done something wrong.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. You can make a complaint at any time by contacting our data protection officer.

You can also complain to the Information Commissioner’s Office in one of the following ways:

• Report a concern online at <https://ico.org.uk/concerns/>

• Call 0303 123 1113

• Or write to: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

• Jhe Taylor-Brown, Project Coordinator, [jhe@comicsyouth.co.uk](mailto:jhe@comicsyouth.co.uk) uk or call 07525369624

*This notice is based on the Department for Education’s model privacy notice amended to reflect the way we use data in this organisation.*

Appendix 1

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Purpose of processing** | **Categories of individuals** | **Categories of personal data** | **Categories of recipients** | **Retention schedule (if possible)** | **General description of technical and organisational security measures (if possible)** | **Article 6 lawful basis for processing personal data** |
| Payroll | Employees | Contact details | HMRC | 5 years post-employment | Encrypted storage and locked filling cabinet | Article 6(1)(C)-legal obligation |
| Payroll | Employees | Bank details | HMRC | 3 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(C)-legal obligation |
| Payroll | Employees | Pension details | HMRC | 75 years-post employments | Encrypted storage and locked filing cabinet | Article 6(1)(C)-legal obligation |
| Payroll | Employees | Tax details | HMRC | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(C)-legal obligation |
| Personnel file | Employees | Contact details | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Personnel file | Employees | Pay details | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Personnel File | Employees | Annual Leave details | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Personnel File | Employees | Sick leave details | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Successful candidates | Contact details | Referee | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Successful candidates | Qualifications | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Successful candidates | Employment history | N/A | 6 yeast post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Successful candidates | Ethnicity | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Successful candidates | Disability details | N/A | 6 years post-employment | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Safeguarding | Successful candidates | DBS Information and Immigration proof | N/A | 25 years (Insurance requirement) | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Unsuccessful candidates | Contact details | N/A | 12 months post-campaign | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Unsuccessful candidates | Qualifications | N/A | 12 months post-campaign | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Unsuccessful candidates | Employment history | N/A | 12 months post-campaign | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Unsuccessful candidates | Ethnicity | N/A | 12 months post-campaign | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Unsuccessful candidates | Disability details | N/A | 12-months post-campaign | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Directors | Contact details | Companies House | 1-year post attendance | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Recruitment | Directors | NI details | Companies House | 1-year post attendance | Encrypted storage and locked filing cabinet | Article 6(1)(b)-legal contract |
| Safeguarding | Young people | Young people’s membership forms | N/A | 1-year post attendance | Held by staff in sessions | Article 6(1)(c)-legal obligation |
| Safeguarding | Young people | Parental consent forms | N/A | 2-year post attendance | Encrypted storage | Article 6(1)(c)-legal obligation |
| Safeguarding | Young people | Parental consent forms | N/A | 3-year post attendance | Held by staff in sessions | Article 6(1)(c)-legal obligation |
| Advertising, reports and records | Young people | Photographs and videos | N/A | 4-year post attendance | Encrypted storage | Article 6(1)(1)- consent |
| Advertising, reports and records | Partners | Contact details | General public | 1-year post closure | Web site and encrypted storage | Article 6(1)(1)- consent |
| Income generation | Clients | Required by DBS | DBS | On receipt of DBS check received | Encrypted storage | Article 6(1)(b)- contract |