**PRIVACY NOTICE**

Age UK Bolton is committed to protecting the privacy and security of your personal information. We use data to help us provide and deliver our services; we respect your privacy and work hard to ensure that we meet strict regulatory requirements.

**Rest assured that we do not sell your personal data to third parties**.

Age UK Bolton is a registered charity (Reg. No. 223240)

Our contact details are as follows:
Address: Age UK Bolton, The Square, 53-55 Victoria Square, Bolton BL1 1RZ
Telephone: 01204 382411
E-mail: enquiries@ageukbolton.org.uk

**Changes in Data Protection Law**

The Data Protection Act 2018 and associated legislation, including the General Data Protection Regulations, is a positive step towards **you** having more control over how **your data** is used and how you are contacted.

We are a data controller: this means we are responsible for deciding how we hold and use personal information about you. This notice explains to you what decisions we have taken in relation to that information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR). We encourage you to read this notice carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal or sensitive information about you, so that you are aware of how and why we are using this information. It applies to all employees, workers and contractors.

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Corporate Services Manager as above.

**Data protection principles**

In collecting and processing your personal information, we will comply with the data protection law in force at the time. This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

**The kind of information we hold about you**

We will collect, store, and use a variety of categories of personal information about you. The personal information that we collect might include your name, your postal address, your e-mail address, your telephone numbers, your date of birth and, sometimes, photographic images or filmed footage of activities. It may include other information such as who you work for and anything else someone could use to identify you as an individual.

We may also collect, store and use “special categories” of more sensitive personal information, including (but not limited to) information revealing: health or medical conditions; racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal data relating to criminal offences and convictions.

The categories of information are detailed in the Schedule attached to this notice.

**How is your personal information collected?**

We collect personal information through various sources, e.g. if you are employed by us, access our services, sign-up to our newsletters, make a donation or use our website. We sometimes collect additional information from third parties and partners with whom we work or who provide services for us.

If you are employed by us we will collect additional personal information through the recruitment process and subsequently in the course of job related activities throughout the period of you working for us including: former employers; Disclosure and Barring Service.

**How we will use information about you**

We will only use your personal information when the law allows us to and as detailed in the Schedule to this notice.

**Situations in which we will use your personal information**

There are a variety of situations in which we will use the information we collect about you and these are detailed in the Schedule to this notice. The information in the Schedule includes the use we make of particularly sensitive personal information, such as information about your physical or mental health and criminal records information.

Where we use your personal information to pursue the legitimate interests of the business, we will only do so provided your interests and fundamental rights do not override those interests.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

**If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to deliver the service or perform the contract we have entered into with you such as paying you or providing a benefit or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers or protect the vital interests of our clients).

**Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Do we need your consent to use particularly sensitive information?**

We do not need your consent if we use your personal information in accordance with our written policy to carry out our legal obligations or to exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

**Why might we share your personal information with third parties?**

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

We will share your personal information with third parties where required by law, where it is necessary to administer the service/working relationship with you or where we have another legitimate interest in doing so.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Any third parties with whom we might share your personal information and the basis on which we do so are detailed in the Schedule to this notice.

**Data security**

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 employees, volunteers, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Corporate Services Manager/DPO or the Chief Executive.

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.

**Data retention**

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. Details of retention periods for different aspects of your personal information are set out in the Schedule to this notice.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

**Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your service/working relationship with us.

**Your rights in connection with personal information**

Under certain circumstances, the law grants you specific rights. These are summarised below. Please note that your rights may be limited and subject to restrictions in certain situations:

* **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 information we hold about you corrected.
* **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
* **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Corporate Services Manager/DPO or Chief Executive.

**No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**What we may need from you**

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

**Right to withdraw consent**

In any circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Corporate Services Manager/DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

**Complaints to the ICO**

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

**Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information

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| **Data Mapping** |  |  |  |  |  |  |  |  |  |  |  |  |
| **Service Area** | **Basic Contact Details** | **Further personal details, please specify** | **Sensitive Data**  | **Purpose of processing** | **Categories of individuals** | **Recipient Organisation** | **Retention period** | **Reason for retention**  | **Technical/security measures in place** | **Legal Basis**  | **Access** | **Location**  |
| Accounts receivable and payable  | Basic contact details | Financial, bank account details | N/A | To process and receive payments, audit | Contractors, suppliers and customers | HMRC Legal | 6 Years | Contractual | Locked cupboards, encrypted storage, access controls | Contractual | Finance management, Systems admin | Saved in locked storage in The Square |
| Afternoon Tea | Basic contact details | NoK, emergency contact details  | Health, food Intolerance, disability  | Service delivery | Clients | None | 12 months after cessation | Necessary for delivery of service, monitoring reporting  | Locked cupboards, encrypted storage, access controls | Consent  | Operations Director, Service Coordinators, System Admin and session volunteers | Farnworth/Thicketford/Harwood and Breightmet Libraries locked filing cabinets and Charitylog  |
| Ambition for Ageing  | Basic contact details | Photos, emergency contact details | Health, Sexuality, religion, ethnicity,  | Service delivery and monitoring reporting | Clients, volunteers, partner organisations | GMCVO, Bolton CVS, Bolton at Home, Age UK Bolton | 12 months for service delivery and 6 years for grants | Service delivery, monitoring reporting, grant payment | Locked cupboards, encrypted storage, access controls | Consent  | AfA Project Delivery Officer, Active Ageing Assistant (AfA), Data Entry Volunteer, Systems Admin, Operations Director | GMCVO encrypted database (encrypted), Charity Log, locked shared restricted files drive folder, AfA google images. CVS Database (encrypted), CVS Shared Drive (access controlled)  |
| Armed Forces Covenant  | Basic contact details | NOK, emergency contact details, member of armed force | Health | Service delivery and monitoring reporting | Clients, volunteers, partner organisations |   |   | Service delivery, monitoring reporting, grant payment | Locked cupboards, encrypted storage, access controls | Consent |   | Charitylog |
| Associate Membership | Basic contact details | N/A | N/A | Share general information  | Members | None | 12 months  | Share information  | Locked cupboards, encrypted storage, access controls | Consent  | Systems Admin  | The Square restricted files and Charitylog |
| Befriending | Basic contact details | Photos, NoK, Emergency Contact details | Health, disability, ethnicity  | Assessments, Emergency Contact, service delivery  | Clients | None | 12 Months | In case of follow up service delivery, monitoring reporting and evaluation  | Locked cupboards, encrypted storage, access controls | Consent  | Service Coordinators/ Quality Assurance Volunteer, OPS Director, System Admin  | Locked filing at Farnworth, Harwood, Thicketford and Breightmet Library and Charitylog  |
| Comments, Compliments and Complaints | Basic contact details | NoK, POA | Health, financial, disability, ethnicity, sexuality and religion  | Investigation and reporting | Clients, volunteer, partner organisation, public, employees | Dependant on nature of complaint | 3 Years | Investigation, monitor reporting and resolution evaluation | Locked cupboards, encrypted storage, access controls | Consent | Corporate Services Manager, CEO and Systems Admin, Trustees | Locked filing at The Square, Farnworth Centre, restricted files and Charitylog  |
| Community Activities | Basic contact details |  NOK emergency contact, photos  | Health, disability | Service delivery/reporting, quality and evaluation  | Clients | N/A | 12 Months after cessation | Service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent - legitimate interests, vital interests | Corporate Services Manager, CEO and Systems Admin, Operations Director, Service Coordinators | Locked filing at Thicketford, Harwood Library and Breightmet library, Charitylog and restricted files |
| Donations | Basic contact details | Donation amount linked to service (as applicable) | N/A | Reporting and financial accounting | Client | None | 6 years | Reporting and financial accounting | Locked cupboards, encrypted storage, access controls | Legitimate interest | Finance Manager, CEO and Systems Admin, | Saved in locked storage in The Square/ Charitylog |
| Enhanced Day Care | Basic contact details | NOK, emergency contact details, photos | Health, disability, food intolerance  | Service delivery, reporting, quality and evaluation | Clients | Bolton Cares, Bolton Council, Bolton Carers Support Group, Bolton Dementia Support Group | 7 Years | Service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent | Operations Director, Service Coordinators, System Admin and session volunteers | Locked filing at Thicketford, Brazley, Winifred Kettle Day Centre, Charitylog and restricted files |
| Enhanced Respite Care Service | Basic contact details | NOK, emergency contact details, photos, POA | Health, disability, food intolerance, ethnicity, religion  | Assessment, referral, service delivery, monitoring reporting, quality and evaluation  | Clients and carers | Bolton GP Federation, Bolton Council, Bolton Carers Support Group, Bolton NHS  | 7 years | Service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent  | Service Coordinators, Admin staff, all staff employed by Wilfred Geere | Charitylog, Wilfred Geere in a locked cupboard, shared drive on Bolton Council Computer at Wilfred Geere - password protected |
| Falls Prevention | Basic contact details | NoK, emergency contact details, photos  | Health, physical disability  | Service delivery, monitoring reporting, quality and evaluation | Clients | GPs  | 12 month after cessation | Service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent  | Service Coordinator/ Instructor, System Admin, session volunteers | The Square, locked cabinet, Charitylog |
| GM Active Ageing  | Basic contact details | NOK, emergency contact details, | Health; disability/ physical ability  | Service delivery and monitoring reporting | Clients | Greater Sport | 12 month after cessation | Service delivery, monitoring reporting, grant payment | Locked cupboards, encrypted storage, access controls | Consent | Falls Prevention Coordinator, Engagement and Development Worker | The Square locked cabinet, Charitylog |
| Help at Home | Basic contact details | NoK, financial, POA | Health, disability  | Referral, service delivery  | Clients | Home Instead, Bolton | Referral only - 12 months, service delivery - 7 Years | In case of follow up referral service delivery, quality assurance, auditing | Locked cupboards, encrypted storage, access controls | Consent and contractual | Commercial Services Manager, Service Co-ordinators, Administrator, System Admin  | The Square - restricted files and Charitylog |
| Home Services | Basic contact details | NOK, financial, POA | Health, disability, food intolerance, religion  | Service delivery and monitoring reporting | Clients | None | 7 years | Service delivery, service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent and contractual | Commercial Services Manager, Service Co-ordinators, Administrator, System Admin  | The Square - locked cabinet and Charitylog |
| Home from Hospital (referrals) | Basic contact details | Hospital Number, NoK, GP, DoB, POA, financial | Health, disability, food intolerance, religion  | Assessment, service delivery, monitoring reporting, quality and evaluation | Clients | Bolton NHS (Foundation Trust and CCG) Bolton GPs, Bolton Council  | 12 Months  | Assessment, quality assurance and auditing | Locked cupboards, encrypted storage, access controls | Consent, contractual  | Operations Director, Administrator, Systems Admin | Hospital locked filing cabinets, Charitylog |
| Home from Hospital (clients) | Basic contact details | Hospital number, NoK, GP, DoB, POA, financial | Health, disability, food intolerance, religion  | Service delivery  | Clients | Bolton NHS (Foundation Trust and CCG) Bolton GPs, Bolton Council  | 7 years | Service delivery, service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent  | Operations Director, Administrator, Systems Admin | Hospital locked filing cabinets, Charitylog |
| HR | Basic contact details | Emergency contact details, NoK, NI number, financial information | Health | Recruitment, employment, absence management, health and safety, duty of care, operational management, employments rights | Employees | Legal representatives, medical/occupational health | 6 years | Legal obligations, emergency services, medical obligations, contractual obligations, vital interests, employment rights, absence management | Locked cupboards, encrypted storage, access controls | Contractual, vital interests | Corporate Services Manager, Line Manager, Systems Admin | The Square, locked filing cabinets, restricted files, My HR Toolkit |
| HR Recruitment | Basic contact details |   | Disability | Job applications | Job applicants | Legal representatives  | 6 months | Queries relating to job applications | Locked cupboards, encrypted storage, access controls | Consent | Corporate Services Manager, Line Manager, Systems Admin | The Square, locked filing cabinets, restricted files, My HR Toolkit |
| Information and Advice - Basic | Basic contact details | NI number | Health, Financial, POA | Referral, service delivery  | Clients | DWP, Bolton Council, Money Advice | 12 Months  | In case of follow up | Locked cupboards, encrypted storage, access controls | Consent  | I&A Officer, Systems Admin, Manager | The Square - locked filing cabinets and Charitylog  |
| Information and Advice - Caseload  | Basic contact details | NI number | Health, Financial, POA | Referral, service delivery  | Clients | DWP, Bolton Council | 6 years | In case of follow up, monitoring reporting, auditing  | Locked cupboards, encrypted storage, access controls | Consent  | I&A Officer, Systems Admin, Manager | The Square - locked filing cabinets and Charitylog  |
| Learning and Activities Centre | Basic contact details | NoK, emergency contact details, photos  | Health, disability, ethnicity (opt) | Service delivery, emergency contact purposes | Clients, Volunteers | None | 12 months after cessation | Service delivery, follow up for new term dates, monitoring reporting | Locked cupboards, encrypted storage, access controls, monitoring and reporting | Consent  | Centre Manager, Operations Director, System Admin | Farnworth office, locked filing cabinets, Charity Log |
| Legal Service | Basic contact details | Name, address, phone number and topic | N/A | Service delivery | Clients | Solicitor firms - Joe Egan, Aspinall & Co, AFG Law, Russell & Russell, Fielding’s Porter and Kippax Beaumont Lewis | 12 Months | In case of follow up and monitoring reporting | Locked cupboards, encrypted storage, access controls | Consent  | I&A Officer, Systems Admin, Manager | The Square - locked filing cabinets and Charitylog  |
| Lunch Clubs/Dining Out Groups | Basic contact details | NoK, emergency contact details, phone number, photos | Health, food intolerance, disability  | Service delivery, monitoring reporting  | Clients | None | 12 months after cessation  | Service delivery | Locked cupboards, encrypted storage, access controls | Consent  | Service Coordinators, Session Volunteers, Operations Director, Systems Admin | Locked filing at Thicketford, Harwood Library, Farnworth Library, Breightmet Library and Charitylog  |
| Men in Sheds | Basic contact details | NoK, emergency contact details, photos  | Health  | Service delivery, monitoring reporting and evaluation  | Clients - volunteers | Bolton at Home | 12 months after cessation  | Monitoring reporting and evaluation  | Locked cupboards, encrypted storage, access controls | Consent  | Operations Director, Service Coordinator, Systems Admin  | Farnworth office, locked filing cabinets, Charity Log |
| Money Matters | Basic contact details | NI number, date of birth, telephone number, Financial information (benefits, pension etc)  | Financial | Make a referral, service delivery  | Clients | Age UK Blackburn with Darwen | 6 Years | In case of follow-up, auditing purposes, reporting  | Locked cupboards, encrypted storage, access controls | Consent | I&A Officer, Systems Admin Manager, Service Volunteers | Locked cupboards, Charitylog |
| Nutrition and Hydration | Basic contact details |   | Health, Nutrition and Hydration self assessment | Make a referral, service delivery  | Clients | Age UK Salford, University of Manchester (as per consent) | 12 months after cessation | Service delivery, service delivery, monitoring reporting, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent |   | Locked cupboards, Charitylog |
| Payroll | Basic contact details | NI number, Bank/BS account details, student loans, attachment of earnings, right to work in the UK | Financial (Bank account information) | Service delivery (Payroll) | Employees | Payroll provider, HMRC, the Courts, local authorities, accountant/auditor | 6 Years | To fulfil contractual and legal obligations, audit purposes | Locked cupboards, encrypted storage, access controls | Contractual, legitimate interests | Finance Manager, System Admin | The Square, locked filing cabinets, restricted files |
| Pension | Basic contact details | NI Number, financial, income information | N/A | Pension processing | Employees | Pension provider, Age UK pensions department, HMRC, payroll provider, auditor/accountants  | 6 Years | To fulfil contractual and legal obligations, audit purposes | Locked cupboards, encrypted storage, access controls | Contractual, legitimate interests | Finance Manager, System Admin | The Square, locked filing cabinets, restricted files |
| Safeguarding | Basic contact details | NoK, financial, POA  | Health, disability  | To make a referral, signpost, report/log  | Clients, public, partner organisations  | Safeguarding Team - Bolton Council, GMP | 7 Years | In case of follow-up, necessary for referral or reporting  | Locked cupboards, encrypted storage, access controls | Consent  | Operations Director, Coordinator, System Admin, I&A Officer  | Charitylog, filing locked in cabinets  |
| Volunteers in Care Homes | Basic contact details | NOK, emergency contact details  | Health, disability, food intolerance | Service delivery | Clients and volunteers | Bolton Council  | 12 motnhs after cessation | Service delivery and monitoring | Locked cupboards, encrypted storage, access controls | Consent | Operations Director, Coordinator, System Admin | Charitylog, filing locked in cabinets  |
| Volunteers - Recruitment  | Basic contact details | NOK, emergency contact details  | Health, disability | Processing volunteer applications | Volunteers | None | 12 months after termination | Queries relating to volunteer applications | Locked cupboards, encrypted storage, access controls | Consent | Operations Director, Coordinator, System Admin | Charitylog, filing locked in cabinets  |
| Volunteers Management | Basic contact details | NOK, emergency contact details  | Health, disability | Service delivery  | Volunteers | None | 12 months after termination | Service delivery and monitoring | Locked cupboards, encrypted storage, access controls | Consent | Operations Director, Coordinator, System Admin | Charitylog, filing locked in cabinets  |
| Wheelchair Hire | Basic contact details | Phone number | Health, ethnicity (opt), disability | Service delivery, in case of late return | Clients | None | 12 Months | Monitoring reporting and evaluation | Locked cupboards, encrypted storage, access controls | Consent  | Centre Manager, Operations Director, Service Co-ordinators, Systems Admin | Farnworth office, locked filing cabinets, Charity Log |
| Wilfred Geere - HfH | Basic contact details | Hospital number, NoK, GP, Disability, DoB | Health involvement of other services, disability, POA | To become a client of the service | Clients | Bolton NHS, Bolton GP Federation, GPs, Bolton Carers Support Group | 7 Years | Service delivery, monitoring reporting, auditing, quality and evaluation  | Locked cupboards, encrypted storage, access controls | Consent  | System Admin, Service Coordinators, HfH Volunteers, Operations Director  | Hospital locked filing cabinets, Charitylog |
| Will Writing | Basic contact details | N/A | N/A | Service Delivery  | Clients | Solicitor firms - Joe Egan, Aspinall & Co, AFG Law, Russell & Russell, Kippax Beaumont Lewis and Cyril Morris Arkwright | On going  | In case of follow-up | Locked cupboards, encrypted storage, access controls | Consent  | I&A Officer, Systems Admin, Manager, service volunteers | The Square - locked filing cabinets and Charitylog  |