

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

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	Service Coordinators, System Admin and session volunteers	Farnworth 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,	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 Brightmet 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, Service Coordinators	Locked filing, 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	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	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	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,	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

								employment rights, absence management				
HR Recruitment	Basic contact details		Disability	Job applications	Job applicants	Legal representatives	6 months (non-interviewed) ; 7 months (shortlisted)	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, 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, , Systems Admin	Locked filing at Thicketford, Harwood Library, Farnworth Library, Brightmet 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	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
PALs Project	Basic contact details	Photos, NoK, Emergency Contact details,	Health, disability, ethnicity	Referral, 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/ SLT , System Admin	Locked filing at Farnworth and 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	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 months after cessation	Service delivery and monitoring	Locked cupboards, encrypted storage, access controls	Consent	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	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	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, 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,	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