

# Full Privacy Notice

## Royal National Children’s SpringBoard Foundation

This Privacy Notice explains when and why we collect personal information about you, how we use it and the conditions under which we may disclose it to others. Your personal data is defined as any information that can directly or indirectly identify you. This notice also explains how we keep your data safe and secure and includes information you need to know about your rights and how to exercise them.

If you have any questions regarding our Privacy Notice and our use of your personal data or would like to exercise any of your rights, please get in touch via the following information:

**Email us:** [admin@royalspringboard.org.uk](mailto:admin@royalspringboard.org.uk)

**Telephone us:** 01932 868622

**Write to us:** C/o McCarthy Denning, 70 Mark Lane, London EC3R 7NQ

**Data Protection Lead:** CEO

**If you are unhappy with the way we process your data**, please get in touch by using one of the contacts above. You can also make a complaint to the Information Commissioner’s Office (ICO) which regulates the use of information in the UK. They can be contacted by:

**Telephone** 0303 123 1113

**Write to the ICO:** Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Or by going online to** [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

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## 1. Who are we?

We are Royal National Children’s SpringBoard Foundation, or RNCSF, and for the purposes of UK Data Protection Law we are registered with the ICO under registration number Z8686247. Our purpose is securing educational bursaries for disadvantaged young people through a mechanism of direct referrals and working in partnership with local organisations and schools.

In this Notice, ‘RNCSF’ ‘we’, ‘us’, ‘our’ means:

Royal National Children’s SpringBoard Foundation (charity registration number 1167491) with a registered address at C/o McCarthy Denning, 70 Mark Lane, London EC3R 7NQ

## 2. Personal data collected, how and why we collect it, and on what lawful basis

Appendix 1 – Human Resources (employees, trustees, job applicants and volunteers)

Appendix 2 – Service Users

Appendix 3 – Fundraising

Appendix 4 – Website visitors and cookies

## 3. Fundraising and Marketing Communications

Your contact details may be used to provide you with information about our services or our fundraising opportunities via:

- **Email, text or other electronic messages**

We will only send you fundraising and marketing communications by email, text, or other electronic message if you have provided your consent or if you have been involved in a commercial transaction with us. You may opt-out of our fundraising and marketing communications at any time by clicking the unsubscribe link at the end of our e-marketing communication. Alternatively, you can let us know by using any of the contact details listed at the top of this notice.

## 4. Your Rights

Under data protection laws in the UK and EU, you have certain rights over the personal information that we hold about you. If you would like to exercise your rights, please get in contact with any of the details listed above. Here is a summary of the rights we think apply:

### a) Right to be Informed

You have the right to be informed as to how we use your data and under what lawful basis we carry out any processing. This Privacy Notice sets this information out however if you would like further information, please get in touch.

### b) Right of Erasure – also known as the right to be forgotten

You may ask us to delete some or all of your information we hold about you. Sometimes where we have a legal obligation we cannot erase your personal data.

### c) Right to Object

You have the right to object to processing where we are using your personal information such as where it is based on legitimate interests or for direct marketing.

### d) Inaccurate personal information corrected

Inaccurate or incomplete information we hold about you can be corrected. The accuracy of your information is important to us and we are working on ways to make this easier for you to review and correct the information that we hold about you. We will also carry out an annual accuracy check. If any of your information is out of date or if you are unsure of this, please get in touch through any of the contact details listed in this notice.

### e) Right of restriction

You have a right to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we are not lawfully allowed to use it.

### f) Right to Access your information

You have a right to request access to a copy of your personal information that we hold about you, along with the information on what personal information we use, why we use it, who we share it with, how long we keep it for and whenever it has been used for automated decision making. You can make a request for access free of charge and proof of identity is required.

### g) Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right to question the outcome of automated decisions that may create legal effects or create a similar significant impact on you. We currently do not undertake automated decision making.

### h) Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you.

### i) Right to withdraw consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data

## 5. Transferring your information outside of the United Kingdom

Where personal data is stored outside of the UK and the EEA, safeguards to protect personal data may include but are not limited to the UK Addendum used in conjunction with the EU Standard Contractual

Clauses (SCCs), or UK International Data Transfer Agreement (IDTAs). Such safeguards will be subject to Transfer Risk Assessments (TRAs).

## 6. Changes to our Privacy Notice

This privacy notice is kept under regular review. If we make any significant changes to the way in which we process your information, we'll make the required changes to this Privacy Notice and will notify you so that you can raise any concerns or objections with us.

When making less impactful changes, we'll update this notice and post a summary of the changes on our website.

This privacy notice was last updated June 2024

## APPENDIX 1 – Human Resources

### ***Freelancers, job applicants and current and former employees, trustees and volunteers***

#### How and when do we collect information about you?

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your employment/engagement.

In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references.

#### What types of information is collected about you and who provides it?

We keep several categories of personal data on our employees/freelancers/job applicants/trustees and volunteers in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each individual and we also hold the data within our computer systems, for example, our holiday booking system.

Specifically, depending on your type of engagement with RNCSE, we may process the following types of data where applicable:

- a) personal details such as name, address, phone numbers
- b) name and contact details of your next of kin
- c) your photograph, your gender, marital status
- d) footage of the organisation events where you may appear
- e) information of any disability or other medical information you have disclosed
- f) right to work documentation
- g) information gathered via the recruitment process such as that included in a CV, cover letter or application form, references from former employers, details on your education and employment history etc
- h) National Insurance number, bank account details and tax codes
- i) information relating to your employment with us (e.g job title, job description, salary, terms and condition of the contract, annual leave records, appraisal and performance indication, formal and informal proceedings involving you such as letters of concern and disciplinary, disciplinary and grievance proceedings.
- j) internal and external training modules undertaken
- k) information on time off from work including sickness absence, family related leave etc
- l) IT equipment use including telephones and internet access
- m) your biography and picture for the website (if applicable).

We may also process special category of data which include health information, sexual orientation, race, ethnic origin, political opinion, religion, trade union membership, genetic and biometric data. We may also process criminal records information if the role involves DBS check.

### How is the information used?

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment or your volunteer/trustee agreement, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative tasks, legal obligation or contractual/agreement obligation. We process information in relation to the DBS for our safe recruitment practices.

### Lawful basis for processing

We mainly use 'contractual obligation' as a lawful basis for processing personal data for employees, job applicants and freelancers. We mainly use 'legitimate interest' for trustees and volunteers. We may also have legal obligation in order to process and share your data, for example we need to share salary information to HRMC or use some of your data to enrol a new employee on a pension scheme.

We may rely on our legitimate interest for processing activity such as keeping supervision and appraisal records; using your image, bio and videos/pictures of the organisations' events where you may appear on our website or marketing/fundraising materials to promote the charity.

Some special categories of personal data, such as information about health or medical conditions is processed in order to carry out employment law obligations (such as those in relation to colleagues with disabilities and for health and safety purposes). We may also process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief for the purposes of equal opportunities monitoring. When processing criminal records (for example, in order to perform DBS check), the organisation relies on the lawful basis of legitimate interest. When processing special category of data and criminal records, we rely on additional conditions of the UK GDPR and DPA 2018.

### How long do we keep your data?

We only keep your data for as long as we need it for, which will be at least for the duration of your employment/engagement with us though in some cases we will keep your data for a period of 20 years after your employment/engagement has ended. If you've applied for a vacancy but your application hasn't been successful, we will keep your data only for 1 year.

Some data retention periods are set by the law. Retention periods can vary depending on why we need your data. Please get in touch by contacting us using the details above if you want to know more about retention period.

Data is destroyed or deleted in a secure manner as soon as the retention date has passed.

### Confidentiality - who do we share your data with?

Data in relation to your salary is shared with HRMC as part of our legal obligation. Data may be shared with third parties for the following reasons: for the administration of payroll, pension, HR functions, administering other employee benefits (such as the Childcare Voucher Scheme). When sharing information with third parties, we have data sharing, processor agreements or contracts in place to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

## APPENDIX 2 –Supported young people/Applicants/Supported parents or guardians

### How we collect information about you?

The information collected may include special category of data which include health information, sexual orientation, race, ethnic origin, political opinion, religion, trade union membership, genetic and biometric data. They may also contain criminal records information. Examples include:

**Information provided by the you, your school, parents/guardians or partner charities and organisations during assessment processes may be:** name, date of birth, medical information, gender, ethnicity, religion, contact details, health conditions, contacts of education provider, behavioural information, school attendance, life background, biographical information (this list is indicative not exhaustive)

**Information provided by you during the young person's participation either as a school placement bursary recipient and/or mentee and/or as an alumni:** any updates that emerge throughout the duration of the delivery period of the supported young person's: name, medical information, gender, ethnicity, religion, contact details, health conditions, contacts of education provider, behavioural information, school attendance, life background, biographical information (this list is indicative not exhaustive)

**Information that the Local Authority may provide about during the young person's participation either as a school placement bursary recipient and/or mentee and/or as an alumni** any updates that emerge throughout the duration of the delivery period of the supported young person's: name, medical information, gender, ethnicity, religion, contact details, health conditions, contacts of education provider, behavioural information, school attendance, life background, biographical information (this list is indicative not exhaustive)

**Information provided by delivery partners during the young person's participation either as a school placement bursary recipient and/or mentee and/or as an alumni:** any updates that emerge throughout the duration of the delivery period of the supported young person's: name, medical information, gender, ethnicity, religion, contact details, health conditions, contacts of education provider, behavioural information, school attendance, life background, biographical information (this list is indicative not exhaustive)

### How is your information used?

We may use your personal information to

- Carry out a thorough evaluation of your needs, family circumstances, household finances etc. in order to assess eligibility under our programme criteria;
- Provide the supported young person with the information and advice needed in order to successfully secure a bursary place and/or other forms of assistance with their schooling, pastoral care and associated activities
- Provide the school which the supported young person is attending with information about the supported young person and the support being provided in order to maintain their place at the school
- where applicable, providing any partner charity, local authority or other organisation that also supports the supported young person with information about you
- provide the supported young person with information about the activities of the Charity and its partners
- administer the support provided by the Charity to the supported young person

- manage any enquiries or complaints raised by the supported young person and/or respond to any communications from the supported young person;
- provide an alumni group which the supported young person can access;
- provide progress reports to funders;
- receive payments from the funders;
- Monitor and manage risk;
- Protect yourself and the general public;
- Safeguarding;
- Conduct research;
- Conduct evaluation;
- Collate anonymised or pseudonymised statistical information for funders, the charity and delivery partners
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

### Lawful basis for processing

We rely on legitimate interest as our lawful basis for processing your personal data.

When we process special category of data and criminal records, the lawful basis is supported by additional conditions of the law.

If third party contractors are engaged to conduct research that requires review of data and experiences of supported young people, the lawful basis on which they are engaged to do so is legitimate interest.

### How long do we keep your data for?

We retain the personal data of all service users for a period of 20 years. However, our previous policy was to review and destroy records 7 years from the point at which the supported child turned 18, which applies to leavers prior to and including Summer 2017. Please note that following the end of the Charity's support of your education, our relationship will continue through you being a member of our alumni until this relationship is terminated by you or the Charity.

Information relating to individuals who are referred to us who do not, for whatever reason, progress into one of our services will have their personal data retained for a period of 7 years. After this time, personal data will be reviewed and securely destroyed.

Research data will not be kept for longer than is necessary for the purpose on which it is processed.

### Confidentiality, data sharing and safeguarding

- We use legitimate interest as the lawful basis on which information about the supported pupil and the supported pupil's family/carers are shared with the school that they are seeking to apply to and/or are attending and to any other charity or organisation which is also providing support and/or funding in respect of supported young people's education, pastoral care or related activities, central and local government and their agencies, the police and related agencies, HM Revenue and Customs, in order to provide you with a quality service which best suits your needs. Each organisation acts as individual data controller of your personal information and you should read their privacy notice in addition to this one

- Where third party suppliers are engaged by the Charity to act as data processors they will process your data on our behalf and their basis for doing so will be governed by a data processing agreement detailing how this will be done in accordance with data subjects' rights and other UK GDPR provisions.
- Personal data is not shared with funders. Information to funders is shared only anonymously.
- To comply with our safeguarding policy, we may need to pass some information raising safeguarding concerns with the authorities. In such circumstances, we apply vital interest and legitimate interest as our lawful basis. Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed in these circumstances. Exceptions and exemptions are applied on a case by case basis.

## APPENDIX 3 – Fundraising

### Information collected and why, who provides it, data retention and lawful basis

#### **When you make a donation**

Information is provided by you via a donation form on our website or via third party donation platforms (e.g Charities Aid Foundation). The information gathered is likely to include: name, email address, Gift Aid sign up, company name if donation made by an organisation, donation details

This information allows us to process your donation and deal with any potential enquiry. We rely on our legitimate interest to process this data. If you agree that we can claim Gift Aid on your donations we are legally required to keep a record of the claim and your Gift Aid declaration.

If you are donating using a third party, please also refer to the privacy notice published on their websites.

#### **When you sign up to our fundraising event**

Information is mainly provided by you via our website forms, via third party platforms (e.g Eventbrite,) or in person during the events by paper forms. The information gathered may be: name, email address, company name if applicable, donation/payment details, email address contact preference

This information allows us to administer your sign up, process payments, and deal with any potential enquiry. We rely on the legitimate interest to process this data.

During these types of events, we may also take photographs and video recording of people attending where you may be included. This information allows us to showcase our work and have an effective external communication. Consent will be sought and recorded from any young person prior to use of their photographs or video footage.

If you are signing up to an event using a third party, please also refer to the privacy notice published on their websites.

#### **When you show interest in supporting us (e.g through a gift in your will or a pledge) and you decide to contact us**

Information is provided mainly by yourself, via online forms or phone/email conversation with us. The information gathered may be: occupation, title, details of any correspondence had with ourselves, date



of birth, fundraising appeals responses, event participations with us, details of your reasons to engage with us.

This information allows us deal with your enquiry and show you how to get engaged. We rely on our legitimate interest to process this data.

## Philanthropy

In case of a generous donation or in order to identify potential high value supporters, we may use profiling and screening techniques. We may undertake in-house research and from time to time engage specialist agencies to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

We would gather publicly available information regarding previous charity support, connection to our cause, credibility, geographical, demographic, financial soundness, career information, peer networks and other publicly-available information (e.g. age, address, listed Directorships, hobbies and interests). If you have already engaged with us, we may also profile information that you have provided to us during your engagement, including information such as occupation, title, details of any correspondence had with us, DOB, fundraising appeals responses, event participations with us, details of your reasons to engage with us.

We also use publicly available sources to carry out due diligence on donors in line with the charity's 'Know your Donor' Policy and to meet money laundering regulations.

This information also allows us to understand how likely it is that you would be interested in supporting us so that we can better tailor our communications such as telling you about the things you are likely to be interested in, letting you know of ways to fundraise with us which are relevant to you and making sure that we only talk to you about a financial level of giving that is appropriate to you.

## How long do we keep your data for?

We keep your data for as long as necessary. If you've made a donation, showed interest in supporting us or participated in our events we may keep your data for the duration of our relationship and for 20 years after this ends. If you are a regular donor, we may keep your data for 20 years once you've stopped engaging with us.

Data is destroyed or deleted in a secure manner as soon as the retention date has passed.

If you wish to know more about our data retention, please contact us using the details above.

## Confidentiality - who do we share your data with?

Please rest assured that we will never sell your details to any third party.

In addition, if we ever need to send data to a third party for processing for the purposes of legitimate interests (for example checking against the Telephone Preference Service, updating our records and prospect researching from publicly available sources such as the electoral roll) we will make sure the company we use has signed a data processing agreement with us or other contractual obligations, so that they are bound to take care of your data in the same way we do. We may also share personal information with external auditors, e.g. the Charities Commission or for the audit of our accounts. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

If you have made a Gift Aid declaration, we may disclose the information you have provided as part of the declaration to HMRC for the purpose of reclaiming gift aid on your donation(s). We may share or disclose your personal information if we are required to do so by any law, regulation or court order.

## APPENDIX 4 – Website visitors and cookies

### Website Cookies

For more information about our website cookies, please refer to our Cookies Policy online.

### Social Media

When you interact with us on social media platforms such as LinkedIn, X or Instagram, we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms. Please review the privacy notice of those platforms, in addition to this one.

### Links to other websites

Our website may contain links to other websites of interest. Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.