

**Who are we?**

Ochil Youths Community Improvement (OYCI) exists to help young people in Clacks flourish. We create space and opportunity for young people to be themselves while they figure out what is important to them, and what they might want to learn and achieve.

In order to make our work happen, we work with and collect personal data about young people, youth workers, fundraisers, donors and all those who make what we do possible. We'd like to tell you about what we do which will help you understand why we collect your data, how we use it, what we do to keep it safe and your rights about how we process your data. If you need any further information about it, please contact us at [admin@oyci.org.uk](mailto:admin@oyci.org.uk) - we'd be delighted to help.

Ochil Youths Community Improvement is registered as a Data Controller, number ZC008770. Ochil Youths Community Improvement is a registered charity with OSCR, number SC050114.

**What is personal data?**

Personal data is any data about, or that identifies you, the individual. Personal data can vary in its nature and consists of:

- Contact data e.g. name, contact details (email, phone, address etc)
- Personal data e.g. date of birth, gender, ethnicity etc
- Financial e.g. account details, credit/debit card details, financial transactions
- Social e.g. criminal, professional status (job title, salary etc), social networking, relationships, communications
- Health data e.g. medical conditions, additional support needs, GP details
- Photographs and Videos

**What personal data do we collect?**

When you engage with us we may collect information about you. This may include any of the examples above, why you are interested in OYCI, interactions you have had with us and other information relating to you personally which you may choose to provide to us. Data protection law recognises that certain types of personal information are more sensitive. Sensitive information will only be collected where necessary, for example, when we need to collect a young person's health information when they register for our services. We may need to understand more about your background to support the monitoring of the effectiveness of our programmes. Clear notices will be provided at the time we collect this information, stating what information is needed, and why and which parts are optional. With your explicit consent, we may also collect sensitive personal

information if you choose to tell us about your experiences for use in research or a case study.

### **Why we collect personal data and how we use it?**

OYCI offers a wide range of opportunities and support to young people. We collect data in order to administer, deliver and monitor our services and support to young people, to fundraise and generate funds to support our work, respond to enquiries, and to meet our contractual and legal obligations. We have strict safety and safeguarding policies in place which means that in addition to collecting data about our employees and volunteers for the purpose of their role with us, we capture other data in relation to criminal records.

In order to make what we do happen and to improve the lives of young people, we use personal data in the following ways:

- To administer and monitor young people's participation in our programmes and the impact and outcomes for young people.
- To undertake research and analysis to develop and improve our services
- To promote opportunities to young people
- To promote, administer, run and facilitate participation in residential activities
- To promote the work of Ochil Youths Community Improvement (using media content) through websites, social media, promotional materials, publications, press releases or other illustrations of our work
- To engage current and potential funders and fundraisers with opportunities to support our work and make what we do possible.
- To process financial payments and donations
- To ensure that all those working for Ochil Youths Community Improvement have had relevant checks to work with children, young people and vulnerable adults
- To employ and manage staff and volunteers and manage applications
- To respond to enquiries and complaints
- To undertake due diligence to manage risks.

### **How we collect personal data**

#### **Direct from the individual**

Ochil Youths Community Improvement collects data directly from individuals (e.g. young people, youth workers, funders, donors, current and potential employees, trustees etc) and those with parental/guardian responsibility for a young person. When

information is collected, we will explain what it is for and be clear about elements that are optional.

We do not collect any information from people who visit our website.

### **Using media content (photo, video and audio content)**

To help promote the value of our work, OYCI captures a range of photographic, video and audio content. Photos, videos and audio content may be used by OYCI, or by our event partner(s) (including funders) on websites, social media, promotional materials, publications, press releases or other illustrations of our work. We will ask for consent from individuals that will be used in photos, videos and audio recordings where they may be identifiable. Where the individual is under the age of 18 or a vulnerable adult we will seek consent of their parent/guardian. Consent can be withdrawn at any time (see below). If consent is withdrawn we will stop using the photos/videos/audio content for future purposes but may not be able to retract publications already in the public domain.

### **How you can withdraw your consent**

OYCI captures consent for a number of its activities (identified above 'How we use personal data'). Consent can be withdrawn at any point by contacting us at [admin@oyci.org.uk](mailto:admin@oyci.org.uk) or 07751066200. Young people participating in a programme can withdraw their consent at any point by contacting us; however this may impact their ability to fully participate in the programme.

### **How we store and secure data**

OYCI takes its responsibility to protect personal data seriously. We ensure that our data is held securely within our main database on our internal network. We use a range of tools and technologies to capture, process and store data securely. Only authorised employees and those who process data on our behalf (e.g. software suppliers) have access to data. We have a strict Data Protection Policy and data sharing agreements in place to ensure that appropriate processes, procedures and best practice is in place to protect personal data. Only the data that is necessary to perform the task is accessed and processed.

### **How we share personal data**

OYCI **does not sell** any personal data that we hold. We do share personal data with the following parties:

- Data Processors (Bookeo, Mailchimp, Microsoft Office)
- Partners delivering our programmes (for the purposes of networking and access to opportunities)

- Funders will receive aggregated and anonymised statistics only. These are shared with funders to demonstrate the impact of participation in our programmes.
- HMRC and other organisations for the performance of employee contracts
- Social Services, emergency services, the Health and Safety executive, local authorities and the police in the event of an emergency or in the event of a safeguarding issue. This is in line with our Child Protection Policy (e.g. there is a risk to the safety of a young person or any other party) or to law enforcement agencies for the prevention and detection of crime. Where relevant, and if there exists a conflict, Child Protection legislation and policy supersedes GDPR.
- Where we have a legal or regulatory obligation we will share data/information with the police, law enforcement agencies, the Government and statutory agencies or any other necessary parties.
- The Disclosure and Barring Service (DBS) for the purposes of verifying suitability of those working with children and young people.

**How long do we keep personal data?**

OYCI will only store your data for as long as necessary and in line with the original purpose(s) that it was collected. We collect, store and process personal data in line with our Data Protection Policy and have strict retention schedules. We also comply with our legal obligations to keep certain data for a period of time.

**Your rights**

Individuals who we collect, process and store personal data about have a number of rights under the GDPR (General Data Protection Regulations) which include:

- The right to request a copy of the data that OYCI holds about them
- The right to be forgotten
- The right to have data rectified/updated

**Accessing your data**

You are entitled to make a request to gain access to a copy of the data we hold and to find out how we use your data.

You may make a request at any time by contacting us on [admin@oyci.org.uk](mailto:admin@oyci.org.uk). Your request will be processed free of charge. In the event of repeated/excessive requests OYCI reserves the right to charge a fee. When making a request, we will verify that you are who you say you are by checking appropriate forms of identification. We will respond to any requests within 30 days.

**The right to be forgotten**

If you no longer wish for OYCI to store and process your data, you have the right to request that it be deleted. You can request this verbally or in writing and we will respond

within one month of the request.

Under the GDPR OYCI must respond to a request to have your data erased, however there are circumstances where we will be unable to erase data due to other obligations.

For example:

- Where there are financial transactions on your record (where part of the data must be kept for a set period of time). In this instance, we will keep the data that must be held for financial and audit purposes and will erase all data not required for this purpose
- Where there has been a disciplinary/safeguarding issue etc.

Full details and an explanation of our decision will be communicated to you.

### **The right to rectification**

Individuals about whom we collect, process and store data have the right to have inaccurate data rectified or incomplete data completed.

If your data is inaccurate or incomplete, you have the right to request that we rectify it.

OYCI will respond to a request within one month of receipt. However, in certain circumstances we reserve the right to refuse a request (e.g. where there has been a disciplinary or safeguarding issue and the recorded information is a record of findings of an investigation).

### **Complaints**

If you have any concerns or questions about your data, the information contained within this notice or our Data Protection Policy, or you wish to make a complaint please contact [admin@oyci.org.uk](mailto:admin@oyci.org.uk).

If you are dissatisfied, or if you believe your data has been processed in a way that is not compliant with the GDPR, you have the right to complain to the Information Commissioners Office (ICO) by visiting their [website](#) or by calling 0303 123 1113.