

## PRIVACY POLICY

### **Introduction:**

Friends of the Award (FOTA) is a charity which supports the delivery of the Duke of Edinburgh's Award (DofE), Junior Award Scheme for Schools and other accredited learning programmes for young people in Edinburgh and the Lothians.

FOTA take our obligations to look after your personal data very seriously and we comply with the General Data Protection Regulation (GDPR) that came into effect on 01 January 2021 after the UK's exit from the EU.

We are a company limited by guarantee (Company number SC184821) and a charity registered in Scotland (Scottish Charity number SC027771). We are registered as a data controller with the Information Commissioner's Office (registration number ZA793451).

This statement explains how and why we collect, process and store your personal information.

### **Child protection and privacy**

FOTA works in the youth sector with young people of secondary school age and beyond, approximately aged 12-25. Where relevant, and if there is a conflict, Child Protection legislation and policy will supersede GDPR.

### **What information FOTA collects, why and how it is used**

FOTA collects the following information:

- 1 Personal information collected when you register with one of our projects, register as a volunteer or join us as a member of staff. This includes name, address, emergency contact details, relevant medical details. This information will be collected using an application or registration form and is used by us to keep you safe during your time with us, and to enable us to contact the relevant people in an emergency situation.
- 2 Information collected as you use our services. This information will be used for the purposes outlined at the time of collection, for example to record progress towards completion of an award through DofE, JASS or another award scheme. This information may include photographs if you have given consent.

How we use your information:

We will only use your personal information to help you participate in our programmes or to help record progress towards youth awards you are registered for, and to tell you about other activities we offer which may be of interest to you.

We also use data to review and evaluate our services, and to react to feedback, to complete annual reports or funding reports as a contractual obligation. This data will be anonymised, your name and personal information will not be used in this way.

### **How we handle your data**

The information you provide (your name, address, contact numbers, date of birth, gender, medical information, emergency contact details etc) is held on a database accessible only to FOTA staff on a secure password-protected cloud-based system.

Key information such as your name, contact numbers, medical and emergency details are made available to relevant expedition leaders and home emergency contact only for each event in case of a medical or other emergency. Electronic information is deleted and printed information is shredded immediately afterwards.

### **Sharing information**

We will only share your information with 3rd parties if they need to know, for example if you enrol through us with an external award programme or if you have been referred to our services by a partner organisation such as CAMHS or your youth group or school. We will never share your information with marketing or promotional companies or with any other organisations you are not aware of.

Potentially sensitive personal information may be shared with funders for the purpose of monitoring the engagement and impact of our programmes. In this situation all information is fully anonymised.

### **PVG Scheme**

All staff and volunteers who work with young people must apply for PVG scheme membership and updates. To process the PVG checks sensitive personal data is required. FOTA use Volunteer Scotland's Disclosure Services to process PVGs and follow all applicable data security policies. PVG data is viewed only by the member of FOTA staff involved in processing the check. All checks are now electronic and no paper records are held.

### **Security**

We build in safeguards to keep your personal data as secure as possible. All staff members are made aware of their obligations to use information for authorised purposes only. We are accredited with Cyber Essentials and work to maintain that accreditation each year.

All personal data is accessible only to those who need to use it. We make that judgement based upon the sensitivity and value of the information in question. Personal data may be kept:

- in a lockable room with controlled access.
- in a locked drawer or filing cabinet.
- stored on password-protected network servers and databases.
- particular care is taken of portable IT equipment which are password protected and encrypted to prevent unauthorised access.

- sensitive personal data is not kept on memory sticks or routinely taken from our premises on any form of removable media

### **MailChimp**

We use MailChimp as our email newsletter platform. MailChimp is a third-party, cloud-based system and data is not held locally. MailChimp store data in the USA in compliance with GDPR and the EU-US Privacy Shield Framework. Only your name and email address will be held in Mailchimp (if you opted in) in order to keep in touch about relevant training, events and news we believe may be of interest to you. You can unsubscribe from this at any time using the links within any of our Mailchimp communications.

### **eJASS**

eJASS has been designed as an online tool to support the JASS programme. eJASS is an web application hosted by Linode. No third party analytic tools are used and data is not shared beyond eJASS staff, participants and school mentors. Data collected by eJASS includes participant names and school details, activity information and award progress. For further information specific to eJASS please email us at [admin@jassschools.org.uk](mailto:admin@jassschools.org.uk).

### **Photographs**

We may take photographs during activities. Participants will only be included in photographs where consent has been given in advance. Photographs may be used for reporting to funders and for publicity purposes.

### **Data retention**

FOTA will not store your information for longer than we need to. In deciding how long to keep your personal information we consider the key principles set out in UK GDPR with regard to storage limitation.

### **Partnership working**

Much of our work involves direct delivery of the DofE to young people on behalf of our local authority partners. Data associated with this work is owned by said partners and our staff work directly to their policies and protocols. In addition, our work with young people with mental health issues is in partnership with NHS Lothian Children and Adolescent Mental Health Service. Data sharing on this project conforms to their policies and protocols.

### **Your rights**

You have the right at any time to ask us to view, amend or delete the data we hold on you at any time. To do this please contact [admin@fota.org.uk](mailto:admin@fota.org.uk)

### **Reviewing this notice**

We review this notice as required. This notice was last reviewed on 27 February 2023.