



General Data Protection Regulation (GDPR)/Privacy Policy

Current policy date	February 2023
Review date	February 2024

You matter to us

The privacy and security of your personal data is very important to us. We take this responsibility seriously and want you to be confident in how we manage such information.

This Privacy Policy explains how and why we use your personal data, your rights and our obligations to you.

This Privacy Policy applies to Sailship Training & Learning for Life, its trustees, employees, volunteers, contractors, suppliers, clients whether you contact us by email, call or write to us. We may, in certain circumstances, provide specific privacy notices related to individual items but they will always refer to this privacy policy.

We will never sell your data and will only share it with other parties when it is necessary, there is a legitimate interest, or where explicit consent has been given and the privacy and security of the data is assured.

We will continue to monitor our processes and if, in certain circumstances, we need to update our privacy policy, we will notify you. This policy will also be available on our website at www.sailship.org.uk/privacy-policy.

About us

We are Sailship Training & Learning for Life, (hereinafter referred to as "Sailship", "the charity", "the trust", "us", "we", "the society"), and our aims are to;

- **advance the education** (including but not limited to social and physical training) of people in need by reason of youth, age, ill-health, disability, financial hardship or other disadvantage
- and to **provide relief and assistance** to people in need by reason of youth, age, ill-health, disability, financial hardship or other disadvantage, in such ways as the Trustees think fit, in particular but not exclusively by the provision of activities to develop their mental, physical and moral capabilities.

If you have any concerns regarding the management or protection of your data, you can contact us at info@sailship.org.uk or call *telephone number 07538 255387*, or write to us at Gertrude Benson House, 28 Middleton Road, Sudbury, Suffolk CO10 7NT.

What data we collect and how we use it

Our key reasons for collecting data to then be processed are listed below.

For;

- administration of service user details on enrolment to the charity and our courses
- administration of trustee/staff/contracted staffs/volunteer details

and to;

- keep you informed of courses, events and activities
- facilitate the general running of the charity

We will only ask for relevant information to enable us to fulfil our obligation to you and to provide the services advertised in our prospectus, online and on social media sites.

Personal Data - Personal data is information that can be used to identify a living individual or as part of a set of information that, used together, can identify an individual. This will normally include *title, name, address, age or date of birth, gender and contact details which includes email, postal address and telephone number*. We never store or record payment card details, as part of this or any other process.

Sensitive Personal Data – This includes, but is not limited to, racial or ethnic origin, political belief, sexual orientation. We do not request or hold this type of data.

We do promote the activities of Sailship using only the method(s) for which you have provided consent. You may also receive our details from a professional organisation, The Local Authority, a colleague, friend or family member, in the form of a recommendation to use our services. Prior to, or during contact, we will request your consent to obtain and store information necessary to manage your enquiry and maintain contact with you for the purposes of fulfilling that enquiry.

Personal data created by your involvement with us

Your involvement with us will result in personal data being created, collected and held. This could include;

- your title
- name
- address
- age or date of birth
- gender
- contact details (includes postal address, email, telephone number)
- relevant previous records of progress and/or achievement

- relevant certificates/qualifications
- relevant care plans (e.g. social care plans/LDA's (learning difficulty assessment)/EHCP's (education, health and care plan))

We will process the data that you provide so that we can communicate with you effectively, understand your preferences, and work to meet your expectations. We will maintain this information in the form of paper and electronic documents. We will also maintain electronic records of your contact details on our computer(s), including mobile phones and tablet devices.

How long will we keep your information?

Records of your involvement with us will be retained in accordance with current legislation (*such as may be required for auditing purposes*). All other data, will be anonymised or deleted upon request, or following a period of 6 years.

Children's personal data

Sailship also works with children and young people below the age of 18 years. Data relating to children is recorded only for the purpose of identification and to understand and implement relevant support needs to be met via care/support/learning/work experience plans. This information will only be collected after relevant permission (parent/guardian/legal carer) is sought and agreed.

Legal basis for processing your data

In order to process your information, we must have a lawful reason for doing so. The four most common reasons why we process your data are as follows;

- Contractual
- Legitimate interest
- Consent
- Legal Obligation

We will only process (use) your personal information if we have;

- a **contract** with you to provide a service or product. We will use your personal data accordingly e.g. to communicate with you, in order to inform you of events, seek further information relating to your enquiry and provide you with a relevant service/training plan derived from information imparted to us.
- a **legitimate interest** in order to provide the service or information required. We will only work with you to do this and as such you will always be aware that this is taking place.
- your express **consent** that we have on record to allow us to send you specific communications.
- a **legal obligation** e.g. to process payments and store data in accordance with financial regulations.

What is legitimate interest?

This is the legal ground for us to process your personal information if we have a genuine and legitimate reason for doing so. Legitimate interests do not harm your rights and interests as an individual.

Examples of where we would use grounds of legitimate interest to process your data would include the following.

- Where a care need/safeguarding need is identified (including but not limited to); personal care/medication/educational or physical support for disability/mental health support/vulnerability in the community support need.

We will only use your personal data on the relevant lawful grounds as detailed above. We will do this in accordance with existing UK legislation.

We will use your data in accordance with the lawful basis within which we collected it. The main uses of your data depend on the type of relationship we have with you and how you interact with our services and activities.

Fulfilment of request

We use the personal data you provide at the point of engagement to help us provide you the services you request. This includes the following;

- Your name, address(es), telephone number(s), email address(es), and other information which enables us to identify you as an individual and to communicate with you in regard to your request
- Existing Care Plans/learning Plans/Training Plans or other personal data relating to previous achievement to assist us in creating a current plan to support learning/training/therapeutic activities whilst with the charity

Marketing communications

We may send details of our services to you, to our partner organisations and to the public, to promote Sailship's activities and events, some of which will be charge-able, or are intended to raise money for the charity. We will always seek express consent from you if your image or written work, whilst as Sailship, is to be included in any marketing information.

Who we share your data with?

We will not share your personal data outside of the charity, unless you have given your consent first, unless the law requires us to do so (e.g., for safeguarding purposes). When we contact you by email, we will not include your details or details of other members, unless they and you have consented to being copied (cc) on emails. In all other instances of being contacted by email, you will be the only recipient or will have been blind copied (bcc).

How to update your data

We will endeavour to accurately maintain your personal data. You can request us to update your personal data at any time. This includes the right to withdraw your consent to recording any personal data, although please be aware that doing so may make it more difficult and in some cases impossible or impractical to provide our services. Please allow up to 48 hours for your data to be updated. If you contact us via email or post please allow 10 working days from request to action.

Email: Write to info@sailship.org.uk. Please confirm your name and your request. We will store this email on our email system as proof of consent for any amendments to your record.

Call us: (We are available most days between 09:00-17:00 and you can leave a voice message if calling the mobile: *Mobile 07538 255387*. We can then amend your details.

Write to:

The Trustees, Sailship TLL, Gertrude Benson House. 28 Middleton Road, Sudbury, Suffolk CO10 7NT.
We will action your request within 10 days of receipt.

Your rights

You have a number of rights under the **General Data Protection Regulation (GDPR)** and this section briefly highlights them. For more information visit www.ico.org.uk (ICO= Information Commissioners Office)

1. **The right to be informed** – We need to inform you what data we are collecting and why. This privacy policy and any related fair processing notice provides this information.
2. **The right of access** – You have the right of access to your personal data and supplementary information. This information is free unless there is unreasonable effort upon which a charge may be made by us. A request is required in writing and must be specific to a set of data and or a time frame for when the data is required. We must provide you with this information within one month; this may be extended to two months dependent on the nature and complexity of the request.

If you would like to make a request, please email info@sailship.org.uk or write to us at; The Trustees, Sailship TLL, Gertrude Benson House. 28 Middleton Road, Sudbury, Suffolk CO10 7NT.

You will be asked to provide the following details:

- The personal information you want to access
- Where it is likely to be held
- The date range of the information you wish to access

We will also need you to provide information to enable us to confirm your identity. If we do hold personal data about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

3. **The right to rectification** – The right to have your personal data rectified if it is incomplete or inaccurate.
4. **The right to erasure** – The right for the deletion of data where there is no compelling reason for its continued processing.
5. **The right to restrict processing** – The right to suppress or restrict processing. We may retain the data but no longer be permitted to process it.
6. **The right to data portability** – The right to retain your personal data and use it across multiple services.
7. **The right to object** – The right to object to process for legitimate interest, direct marketing and scientific purposes.

8. **Rights in relation to automated decision making and profiling** – Right to object to automated decision making.

Keeping your information

We will only use and or store your information for as long as it is required for the purpose it was collected. The purpose will determine how long it will be kept. This can sometimes be to meet a statutory or legal requirement. If we have explicitly informed you of the length of time, we will securely destroy the data in question when that time is reached.

How we secure your data

The secure management of your data is of the utmost importance to the us.

When you trust us with your data, we will always keep your information secure to maintain your confidentiality. Where appropriate data is encrypted and or password protected. Systems and devices on which data is stored are protected physically and electronically.

Payment card security

We do not receive payments for our services and products using payment card services.

What to do if you are not happy

If you are unhappy with anything related to your personal information, please contact us directly so that we can resolve any problem or query. You can contact us directly on mobile 07538 255387, email us at info@sailship.org.uk or write to us at Gertrude Benson House. 28 Middleton Road, Sudbury, Suffolk CO10 7NT.

You also have the right to contact the Information Commissioners Office (ICO) if you have any questions about Data Protection. They are contactable via the phone on 0303 123 113 or visit their website www.ico.org.uk.

Changes to this privacy policy

We will amend this Privacy Policy from time to time to ensure that it remains up to date and reflects clearly how we use your personal data. We will not amend anything that will affect your rights. The current version will always be available on our website www.sailship.org.uk/privacy-policy, and in printed form on request.

Version control

This Privacy Policy, version 5.0, was last updated on 23th February 2023.