

# The Haven: Privacy Policy

This Privacy Policy applies to information we “the267project” (charity number 1122830) collect and process about individuals who interact with “The Haven” or “Haven Schools”. The Haven operates as a division of the267project and as such those employees of the267project who form part of The Haven team will have access to Haven specific data. It explains what personal data we collect and how we use it, following the principles of General Data Protection Regulation (GDPR) brought into force by the Data Protection Act 2018.

Personal data is information which relates to an identified or identifiable living individual.

You can find further information about the Data Protection Act and GDPR by visiting the Information Commissioner’s Office website at <https://ico.org.uk>

If you have any comments or questions about this Privacy Policy, feel free to contact us at [thehaven@the267project.com](mailto:thehaven@the267project.com) or <mailto:pa@the267project.com>

# 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

<b>Action</b>	<b>Data (key elements) collected</b>	<b>Our Legal Basis for collecting, processing and storing that data</b>
Enquiring about “The Haven” or “Haven Schools” and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in a relevant way
Filling in a permission form for a young person to attend “The Haven” (Local)	Young person’s name & age; medical information including allergies or additional needs; parent’s/carer’s name, email, contact number; name of associated church/youth group.	Vital interests – this information is necessary to safeguard the wellbeing of the young person whilst in the care of “The Haven” (Local)

<p>Answering Therapeutic Questionnaire at each “Haven” session by the young person</p>	<p>Name, responses to 10 questions, which are then anonymised and kept in encrypted files</p>	<p>Vital interests – this information is necessary to safeguard the wellbeing of the young person &amp; to monitor any improvement in the mental health of the young person during the course</p>
<p>Disclosing possible safeguarding concerns</p>	<p>Name, age, date of birth, address of person concerned about; parent/carer email and/or phone number; name &amp; contact number of recorder; names of witnesses</p>	<p>Vital interests – this information is necessary to comply with our Safeguarding Policy (details on our website <a href="https://www.thehaven.uk">https://www.thehaven.uk</a>). If the disclosure is part of the “Haven Schools” programme, the respective school’s Safeguarding Procedures would be invoked.</p>
<p>Making a donation or payment to “The Haven” or “Haven Schools” through “The Haven” bank account.</p>	<p>Name, payment amount</p>	<p>Legitimate interests – this information is necessary for “the267project” to accurately record and account for its income, and to ringfence funds for “The Haven” or “Haven Schools”</p>
<p>Filling in a standing order form to make regular donations to</p>	<p>Name, payment amount, bank account details for initial set-up,</p>	<p>Legitimate interests – this information is necessary for us to fulfil your intention of donating</p>

"The Haven" or "Haven Schools" through "The Haven" bank account	after which they are deleted	money to "The Haven" or "Haven Schools" through "The Haven" bank account; it also allows for accurate recording of and accounting for our income, including ringfencing funds
Providing a Gift Aid declaration	Name, address, signature, tax status	Legal obligation – this information is necessary to comply with the HMRC regulations for Gift Aid
Entering a contract with "The Haven" or "Haven Schools" through "the267project" for services/products provided by you	Name/s, email; bank details of the service provider	Contract – this information is necessary for us to fulfil a contractual relationship, such as making a payment for services/products provided by you
Entering a contract with "The Haven" or "Haven Schools" for services/products provided by "The Haven" or "Haven Schools"	Name/s, email, address	Contract – this information is necessary for us to fulfil a contractual relationship, such as receiving a payment for services/products provided by "The Haven" or "Haven Schools"
Giving permission for the taking of photographs or making videos or podcasts at "The Haven" (local) or "Haven Schools"	Photograph, video clip or podcast identifying image or voice of individual	Consent - permission granted via the Parent Consent form for The Haven Local. Permission granted via photo permission form for The Haven Schools.

Providing personal information as a member of The Haven Advisory Board	Name, email, contact number	Legitimate interests – this information is necessary for us to communicate with you in terms of charity governance
Providing personal information as an employee	Name, email, contact number, address, date of birth; NI number; P45 data; employment history; safeguarding training documents & DBS number; medical or additional needs; bank details for salary payments	Contract – by signing employment contract, you have entered a contractual relationship with us, with legal and financial processes reliant on the processing of the data provided
Providing personal information as a trained/training volunteer/facilitator working with “The Haven” or “Haven Schools”	Name, email, contact number, safeguarding training documents & DBS number	Legitimate interests – this information is necessary for us to communicate with you in terms of charity governance and to comply with our Safeguarding Policy
Using “The Haven” website	The Haven website is run by <i>Squarespace</i> which uses cookies (see their website for which cookies are used)	Legitimate interests – these cookies enable the website to function

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- provide appropriate care for you or your young person when attending “The Haven or “Haven Schools” programme;
- meet legal requirements (such as in reclaiming tax through Gift Aid or recording safeguarding concerns);
- meet financial costs for services provided to “The Haven” or “Haven Schools” through “The Haven” bank account

## 3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors.
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

## 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place<sup>i</sup> to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete/destroy that data promptly once it is no longer required.

Data relating to the disclosure of a Safeguarding issue will be kept and passed securely to the Designated Safeguarding Lead who will follow the procedures outlined in our Safeguarding Policy or the policy of the respective school participating in the “Haven Schools” programme.

Where data is collected based on consent, we will seek renewal of consent at least every three years.

## 5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting ‘unsubscribe’ links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information. (Exceptions apply<sup>ii</sup>.)
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner’s website.

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at <mailto:thehaven@the267project.com> or <mailto:pa@the267project.com>

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website <https://www.thehaven.uk> We will notify you of any changes.

October 2022

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<sup>i</sup> Data Protection Policy; Data Archiving Policy and Register of Data Systems

<sup>ii</sup> Exceptions apply where data collected and processed relates to a Safeguarding concern. This data must be kept and processed in line with our Safeguarding Policy procedures.