

Data Protection Policy

This document outlines how Lindley Educational Trust processes and manages personal data. It:

1. identifies our data controller and designated data protection officer;
2. provides our lawful basis for processing personal data;
3. outlines the scope of personal data we hold and process;
4. describes and justifies our data retention policy;
5. shows how we intend to respond to Subject Access Requests; and
6. contains a copy of our privacy notice.

Data Controller and Data Protection Officer

The Data Controller is Lindley Educational Trust Ltd and the Data Protection Officer is Andy Robinson.

2. Lawful basis for processing

Lindley's services to young people require processing of personal data on the basis of :

1. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
2. processing is necessary for compliance with a legal obligation to which the controller is subject and
3. processing is necessary in order to protect the vital interests of the data subject.

We undertake to always act within the reasonable expectations of our clients and any other individuals about whom we hold personal data.

3. Data we hold

We hold data on individual beneficiaries of our work whilst we work with them and immediately prior and post that activity. We also hold data on organisations that have contracted us to provide services or organisations that have expressed an interest in contracting our services.

Individual beneficiary

Names, addresses, telephone numbers and email addresses. Date of birth, gender, emergency contact details, medical/dietary and other requirements.

Contracting organisations

Names, addresses, telephone numbers and email addresses. Position within organisation.

Mailing lists

We also maintain a mailing list of individuals who have expressed an interest in being kept updated on our work with young people. These include newsletters and updates. Personal data we hold in this regard includes:

Names, addresses and email addresses.

4. Data retention policy

We will hold personal data for as long as is necessary for the purposes of providing appropriate services and information about our services. We may hold data for a longer period where required to comply with sector specific legislation or general legislation compliance enquiries.

5. Subject Access Requests

We will comply to Subject Access Requests in line with the guidance given by the Information Commissioners Office (ICO).

1. We will respond as quickly as possible, within 30 calendar days.
2. We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
3. Data subjects have the right to the following:
 - a) To be told whether any personal data is being processed
 - b) To be given a description of the personal data, the reasons it is being processed and whether it will be given to other organisations or people.
 - c) To be given a copy of the information comprising the data, and given details of the source of the data where this is available.

6. Privacy notice

We will undertake to ensure all clients and beneficiaries sharing their personal data can have the opportunity to read our privacy notice. We will:

1. Publish our privacy notice on Lindley Educational Trust website www.lindleyeducationaltrust.org
2. Add a link to our privacy notice to staff email signatures.
3. Direct clients and beneficiaries who contact us to our privacy notice online, or supply them with a paper copy if needed.

Privacy Notice

This privacy notice relates to the personal data processed by Lindley Educational Trust in relation to provision of services and information about services to clients and beneficiaries.

Who is the Data Controller?

The Data Controller is Lindley Educational Trust Ltd.

What does the Trust do?

The Trust provides a range of personal development and outdoor experiences. As part of this work, we provide residential facilities, appropriately experienced staff and equipment. To ensure provision of appropriate facilities, staff and equipment we must process the personal data of our clients and beneficiaries.

How do we process data?

The Trust processes constituents' data under the lawful basis of performance of a contract, compliance with relevant legislation and protecting the vital interests of our clients and beneficiaries. In instances where this lawful basis is not sufficient and explicit consent is required, a member of the Trust's staff will contact the client or beneficiary to establish consent.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of an individual's privacy.

Will we share your data to anyone else?

We may pass your personal data on to a third-party in the course of providing services for our clients and beneficiaries, such as residential site providers, government agencies, public bodies, health trusts, regulators, and so on. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only for the basis upon which they were originally intended. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

We will not use your personal data in a way that goes beyond your reasonable expectations in contacting us.

For how long will you keep my personal data?

We will hold your data to enable us to provide agreed services and to ensure you are aware of any developments in the Trust's work that you may wish to benefit from. We will dispose of your data on request and in any event will only hold any individual beneficiary data for up to 30 days after service provision unless legal action or legislative compliance requires otherwise.

What rights do I have to my personal data?

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

1. Right of access – you have the right to request a copy of the information that we hold about you.
2. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
3. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
4. Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
5. Right of portability – you have the right to have the data we hold about you transferred to another organisation.
6. Right to object – you have the right to object to certain types of processing, such as direct marketing.
7. Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
8. Right to judicial review: if refuse your request under rights of access, we will provide you with a reason why. You have the right to complain.

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