VOYAGE New City College Shoreditch Campus Falkirk Street, Hackney London N1 6HQ

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VOYAGE

Privacy Policy

Introduction

Voyage promises to respect any personal data we hold about our mentors we work with and keep it safe. When we collect your data, we will be clear about its usage and not do anything with it that you would not reasonably expect.

The scope of this Policy is to explain how we collect, use, and safeguard your personal data. Whiles Voyage complies with the GDPR guidelines.

Where we collect information about you

When you give it to us DIRECTLY

You may give us your information in order to sign up for one of our projects, programmes or our workshops, when making a donation or communicate with us.

When you give it to us INDIRECTLY

Your information may be shared with us by independent third parties, for example fundraising sites like The Big Give, Justgiving or Mydonate. You should check their Privacy Policy when you provide your information to understand fully how they will protect and process your data.

When your information is available PUBLICLY

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our service users, stakeholders and supporters to improve our fundraising methods, programmes and resources.

Public sources include:

- Social Media: Depending on your settings or the privacy policies for social media and messaging services like Facebook, Instagram or Twitter, you might give permission to the public to see information about you.
- o **Information available publicly:** such as Companies House, internet searches and information that has been published in newspapers.

What personal data we collect and how we use it

The information we collect and how we use it depends on why you are providing it.

Service Users, Stakeholders and Mentors







If you participate in our programmes, are one of our workshop facilitators, support us, register to attend our programmes, we will usually collect:

- o Your name
- Your contact details (address, phone number, email etc.)

Where it is appropriate, we also may ask for:

- Your date of birth
- Information relating to your health (e.g. to check you are eligible to participate
 in any of our Special Educational Needs and Disabilities (SEND) programmes or
 if we need to be aware of any additional information before participating in our
 programmes)
- Your communication preferences

We will mainly use your data:

- To provide you with the services, resources or information you requested and/or to enter into a contract or letter of agreement with you to perform defined services
- To administer your:
 - o participation in our programmes
 - o donation including processing gift aid
- To keep a record of your relationship with us
- To ensure we know how you prefer to be contacted
- To understand how we can improve our services
- To comply with a legal or regulatory obligations

Young People's Data Handling

We collect and manage information from children and young people under the age of 18 in a way that is appropriate to their age. Information is collected usually when young people takes part in our programmes or are involved in project with us as an assistant. This can be when a young person signs up directly for our mentoring scheme, Young Leaders programme, our community hubs or Horizons (parental consent is also required) or if an adult provides personal information on their behalf, e.g. a parent, teacher or guardian. This data can be sensitive personal data, e.g. a young participant with additional needs.

Where possible and appropriate, we will seek consent from a parent or guardian before collecting information about children. However if children are participating in one of our programmes with a school or youth group, general information such as age of attendee or relevant additional needs will be provided by our main adult contact (teacher, youth group leader or support worker).

We will only share details in exceptional circumstances to comply with safeguarding best practice or where legally required, for example, where a child reports abuse, or someone reports serious self-harm or a serious intention of harming someone else.

We will not send marketing or promotional messages or market directly to any young person under the age of 18, except in the instance of those who have opted-in and joined one of our youth programmes or theatre clubs.

Vulnerable young people

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Voyage works with some of London most vulnerable and challenging children and young people in London. When we do we ensure young peoples information is protected, respected and their information is not shared with statutory agencies of any kind.

We have created this aspect of the policy as many young people we work with are often deemed socially excluded, linked to troubled communities/ families and could be linked police operations where many do not wish to share their personal details with us or with our funders, investors and donors. Voyage has excepted this approach to guarantee maximum protection due to parental concerns expressed about information being shared either by accident or deliberately.

As a result of this Voyage has chosen to adopt a formal blanket policy "not to share personal information" of our students. As part of this policy we have agreed that

- 1. No emails or telephone numbers will be shared
- Voyage email addresses will be created for young people registered on our programmes
- 2. Part of their postcodes will be shared instead of listed addresses
- 3. First names will be supplied and an initial used to describe the last name

How we keep your data safe and who has access to it

We ensure that there are appropriate technical controls in place to protect your personal details.

Safe Storage: Information you provide is stored on our secure servers and in password protected databases.

Payment Transactions: Any payment transactions will be encrypted. We have Data Protection procedures in place in accordance with Payment Card Industry Data Security Standard (PCI-DSS). We undertake regular reviews of who has access to information we hold to ensure that your information is only accessible to appropriately trained staff members or validated contractors.

Third Parties: We do use third party platforms to collect or process personal data on our behalf, which include Jotform, SurveyMonkey and Typeform, e.g., when you complete an online application form to apply to our programmes. We carry out comprehensive checks on these companies before working with them and ensure they have their own Data Protection procedures and Privacy Policies in place.

Non EEA: Some of our suppliers run their operations outside the European Economic Area (EEA). Therefore, the data we collect may be transferred, stored and/or processed outside the EEA in order to fulfil your request. Although suppliers may not be subject to the same Data Protection laws as UK-based companies, we ensure we only use suppliers that provide an adequate level of protection in accordance with UK Data Protection law. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside the EEA.







Sharing Details: We may need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

Passwords: Where we have given you or where you have chosen a password that enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

Internet Security: The transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

Keeping your information up-to-date and data retention

We will retain your personal data for as long as is necessary to i) fulfil the purposes it was collected for, ii) satisfy any legal and accounting requirements, iii) for our own reporting and research. Once the retention period has ended, we will delete your personal data. For more information on data retention periods, please contact the General Manager (contact details below).

To determine the appropriate retention period for iii), we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

We may also use publicly available sources to keep your records up to date, e.g. Google, the Post Office's National Change of Address Database and information provided to us by other organisations. Please let us know if your contact details change.

We may also retain your information if you send feedback on our services or make a complaint.

Your right to know what we know about you, make changes or ask us to stop using your data

You have a right to ask us to stop processing your personal data which we will do if it's not necessary for the purpose it was provided, e.g. processing your donation or registering you for an event. If you have any concerns, contact us on 0207 6138344 or admin@voyageyouth.com

You have a right to ask for a copy of the information we hold about you which we will do for free. If there are any discrepancies in the information we provide, please let us know and we will correct them. We will try to respond to all legitimate Subject Access Requests, using the ICO Subject Access Request Checklist, within 40 calendar days of receiving it.