



Goodwin Development Trust Privacy Notice

D001

This document

If you have shared your personal information with us, this document contains information regarding how our organisation collects and processes the information you provide to us. We will process your personal information based on the 6 lawful bases for processing of The UK General Data Protection Regulation (GDPR) which are:

1. Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
2. Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
3. Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
4. Vital interests: the processing is necessary to protect someone's life.
5. Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
6. Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

For more information, please visit the ICO website: www.ICO.org.uk

If you have entered into a contract with Goodwin Development Trust for any of our services, we may process your information without your consent, however only if there is a lawful basis to and only in line with the terms detailed in your contract.

Who we are

Goodwin Development Trust are the data controller whose head office is located at The Octagon, Walker Street, Hull, HU3 2RA, Telephone: 01482 587550, <http://goodwintrust.org>.

The company's data protection officer can be contacted at DPO@goodwintrust.org

Goodwin is a community-based development trust as well as a registered charity, our registered charity number is: 1098520 and the Company number: 4454814. Goodwin Development Trusts' ICO registration number is: Z6710254.

We have 2 wholly owned subsidiary companies of The Goodwin Development Trust; these are Goodwin Community Housing and Goodwin Community Trading.

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How we collect information

Goodwin Development Trust collects personal and/or sensitive information from you in a variety of ways, this could be when you:

- Apply for one of our services or job vacancies
- Enter into a contract with one of our services
- Enquire about one of our services or job vacancies
- You phone, email or write to us for any reason
- You contact us through social media or our website
- Submit a DBS form for processing for legal processes
- Disclose your medical information to us as part of your contract
- Through CCTV within some areas of our buildings for the detection and prevention of crime, and the safeguarding of staff, service and building users.
- You are referred to us through an external agency, with your consent
- You have an accident at one of our sites

We have CCTV operating in some of our properties' communal and external areas for the detection and prevention of crime & safeguarding of staff, service and building users. It operates continually and is held for no longer than a 90-day period. Our CCTV systems are not biometric.

Rarely we may refer to CCTV or operate sound recordings and or the use of photographs to provide evidence of alleged anti-social behaviour or crime, safeguarding concerns or staff disciplinary procedures.

We may also take photographs at our events, our properties, or the communities we work with, this is to produce marketing materials or for publicity. Photographs of individuals will not be published without their written consent.

It is likely that we will receive information about you from a third-party company such as:

- Your local council
- Any police, welfare or other support organisations involved with you
- Councillors, MPS or other representatives acting on your behalf or instruction
- References you provide during your application process
- Medical professionals engaged with you
- Schools and/or the Department for Education



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What information we collect about you

Information we collect from you may include (project dependant). This list is not exhaustive:

- Full Name (including any previous names)
- Date of Birth
- National insurance number
- Any sensitive information
- Contact details (including email, phone and address)
- Banking and/or payment details
- Medical information (including details of additional needs if applicable) this is so that we can provide you with the best possible support
- Proofs, including Photo ID, Bank Statements, payslips, and any other documentation applicable to your application for us to process your application fully.
- Characteristics such as ethnicity, nationality, language, Country of birth, religion etc.
- Employment and character references
- Job status/History
- Personal finance information
- Your emergency contact and/or next of kin information
- Your driving status information
- Criminal Record information
- Children's information (see section 6)
- Training information
- Location (through CCTV)
- Details of your personal life/experiences
- Details of third parties you are involved with

If you cannot provide the information required, we may not be able to provide you with your selected service, however we appreciate that everyone's circumstances differ so please contact us if you are having any difficulty.

How we process your information

The information we collect from you is used by us to manage your agreement or contact with Goodwin Development Trust. We may use the information you have provided to support you during your time with the applicable project or throughout your employment with us. ***Please see note 1 for further details.***

Goodwin Development Trusts' board of trustees ask to see statistical performance data at Goodwin's board meeting, all data presented at trustees' meetings is anonymised.

Goodwin may send you a survey periodically to gauge feedback on our performance. From your feedback we can then aim to improve our service further.

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Goodwin uses a centralised IT system to store information, this system is maintained to ensure the highest level of security, integrity and availability possible as an organisation. Our IT processes and systems are compliant with UK GDPR standards.

Children's information

Under UK GDPR, children's information requires particular protection when collecting and processing as they may be less aware of the risk involved. In the UK, children over the age of 13 are lawfully able to give their own consent, therefore we may ask you to provide evidence that you are over this age. For children under the age of 13, we will need to get consent from whomever holds parental responsibility for the child. Goodwin Development Trust will make reasonable efforts to verify that the person giving consent does, in fact, hold parental responsibility for the child.

Children have the same rights as adults over their personal information, including erasure if consent was given as a child, however they are now an adult.

If Goodwin knowingly collect, use or discloses a child's personal information, we will provide notice to the responsible parent and obtain consent in accordance with the applicable law.

Property information

Goodwin own several buildings across the city of Hull, all varying in size and use, we do not consider property information to be personal information, unless this relates to a repair at a property reported by you, in which case this is treated as personal information and is processed as such.

How we will communicate with you

Goodwin need to be able to contact you for various reasons based on the project you are engaged with, this will usually be via phone call or in writing via post or email, which ever method is the most convenient for you, we trust that you will communicate your preferred method to the project during an induction. Your preferred method can always be changed if you would like.

Goodwin projects may be required by their regulator to provide service users with a newsletter, information about the project, the organisation's plans and or activities as well as opportunities that arise such as job adverts etc.

If you wish to receive any of the above, you can opt in by emailing: DPO@Goodwintrust.org

Goodwin projects may also wish to send you marketing material, if you wish to receive marketing material you can opt in by emailing: DPO@Goodwintrust.org

Goodwin will only discuss the details of your contract or personal details with you or those detailed on your agreement (if any). You may wish to have someone named that can speak to us, if you wish to do permanently, please inform us by emailing DPO@Goodwintrust.org, this information will then be stored securely with your personal file.

You may also choose to authorise someone temporarily, you can do this in person or over the phone,

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please note that this does not mean that we will speak to them regarding any future queries or issues.

Who we share your data with and how long do we keep your information

Dependant on the project you are engaged with at Goodwin your data will be stored in accordance with all relevant regulations. If you would like more information, please contact us at DPO@goodwintrust.org.

What we will NOT do

- We will not send you unsolicited marketing material.
- We will not sell your personal data on to third parties.
- We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law, or we have your explicit permission to do that.
- We will not transfer or store your personal data outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

Your rights and how to complain to the ICO

You have the right to request a copy of the data we hold about you. Please contact DPO@goodwintrust.org if you wish to request access to any of your personal data and we will always endeavour to answer your questions as part of our friendly, helpful service. We will respond within 1 month of your request.

It will always help if you can be as specific about what personal data you want to see, what it relates to and within what timeframe, as that will assist our search.

You have the right to correct information that we hold. Please advise us of any changes or corrections by contacting us on 01482 587550 or via email to DPO@Goodwintrust.org

Where you have previously provided consent for us to send you marketing materials or other materials, you have the right to withdraw this consent at any time by emailing us via DPO@Goodwintrust.org

You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at <https://ico.org.uk>.

You have the right to complain about our service, including how we use your personal data:

- In the first instance please contact our team on 01482 587550 or via email DPO@Goodwintrust.org and we will endeavour to resolve any issue for you quickly and with the highest level of customer satisfaction
- If you wish to complain about our use of your personal data you may complain to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/>

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Note 1 – In reference to how we process your information

Dependant on the project you are engaged with within The Goodwin Development Trust we will process your information differently. Here we have supplied a breakdown of why we process your personal information.

Goodwin Nurseries:

- To support children's learning
- To monitor and report on children's progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To comply with the law regarding data sharing
- To protect the safety of adults and children in our care

Goodwin Children's Centres -

We process personal data to deliver our functions in partnership with the local authority and offer support to families requiring early help, under lawful basis public task (please see section 1 of this document (5)

Goodwin Housing – Please see separate Goodwin Housing privacy note

Goodwin Commercial -

- To comply with the law
- To perform a contract and manage a contractual relationship

Goodwin HR -

- To comply with the law
- To perform a contract and manage a contractual relationship
- To ensure the health and wellbeing of staff and volunteers within the organisation
- We also process HR Information to ensure compliance with registered bodies such as OFSTED, and CQC.

Goodwin Finance -

Goodwin Finance will collect your personal information in line with the terms of your contract with Goodwin services. Whilst most data collected is corporate Goodwin's finance team will collect personal information for the following reasons:

- To create a billing account (if you do not already have one).
- To appropriately invoice for the services provided by Goodwin Development Trust
- To chase any outstanding debt there may be on your account
- To process payments based on a contractual basis

Goodwin ICT -

Goodwin's ICT department only deals with Goodwin employees for the purpose of efficient and secure working practices. This is in line with Employee contracts.

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Goodwin Hospitality -

Goodwin hospitality collect and process your information in line with the terms of the contract you sign when making a booking. Whilst most data collected is corporate, Goodwin Hospitality team will process personal information for the following reasons:

- To appropriately invoice for the booking
- To ensure there is a contact for any changes or booking details

Goodwin Veterans project -

Goodwin's Veterans project will process your information based on your contract with the project. The staff team will also if they feel necessary share your personal information to protect life

Goodwin Youth employment projects (Do it, YEI, YAT etc.) -

- To register on course meeting funders eligibility criteria (DWP/ESF) and our own
- To create a plan of learning and support
- To Identify external services that will complement their learning journey
- To comply with PREVENT, Safeguarding and Health and Safety Law
- To evaluate services
- To create case studies and films
- To sign up for qualifications (ASDAN)
- To maintain contact and meet their needs

Goodwin AMIF project -

- Provide a mental health service to both adults and children as per contractual obligations
- Support appropriate ongoing care
- Ensure we have contemporaneous records in case of any court cases which may occur relating to the immigration status of the client
- Comply with safeguarding regulations and law
- Assess the quality of service

Goodwin Youth project -

- To comply with contract and funding requirements
- To comply with the law
- To ensure the safeguarding, health and wellbeing of the young people in our care

Goodwin Back to ours project –

- To comply with contract and funding requirements
- To assess the quality of service
- To ensure delivery of services

Goodwin Pantry -

- To provide a service in line with their membership contract
- To provide them with marketing information regarding offers and events where consent is given
- To provide additional support where consent is given, if needed.

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Danny's Dream –

- Information gathering for referral review
- To ensure that care planning and safe service user support is delivered
- To ensure and support Health and Safety & Safeguarding for all service users and staff
- CQC requirements and contract delivery purposes
- Financial – invoicing purposes

Goodwin Doula & BFPS project -

- Support referrals and care plans
- Provide appropriate and safe care and support
- Health and Safety reviews and updates for home visits
- Updates regularly on risk assessments
- Safeguards staff and volunteers on home visits
- Provide networking updates for agencies i.e., midwives and social care
- Updates for referral provider
- Comply with safeguarding law
- Assess the quality of service – Referral evaluation, mum's evaluation

Goodwin Fareshare project -

Information collected by the Fareshare project is usually corporate information as only businesses can register as members of the service. However, if personal information is collected this is collected and processed in order to deliver your contract with Fareshare only.

Goodwin

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