

Privacy Policy

1.0 Introduction

1.1 Not Alone Mentoring is committed to respecting and protecting any data processed which belongs to a data subject. For the purposes of this policy, an 'individual' refers to any data subject whose data we may process, such as past, present and future staff, students and parents/guardians. The intention of this policy is to inform such individuals how we will collect and process their personal data. A list of definitions can be found at the end of this policy.

1.2 Individuals are encouraged to read this policy to better understand the organisations obligations to its entire community. Collecting and using personal data allows us to work more effectively and provide a tailored and efficient service throughout all of our operations.

1.3 Occasionally we will publish updates to this policy. If we make any significant updates to this policy which may affect the way we process your data, then we will contact you directly to make you aware of the changes.

1.4 This Privacy Policy applies alongside any other policies issued by Not Alone Mentoring. We will always use your information strictly in accordance with all applicable laws concerning the protection of personal data and in accordance with this policy.

1.5 This policy will explain:

- Why we collect personal data
- What personal data we may collect and when
- How we might use your personal data
- Your rights as a data subject
- How to contact us
- Terminology

2.0 Why We Collect Personal Data

2.1 We may collect personal data at any point in order to comply with the operational duties of the organisation. We will process a wide range of data, which is required to support needs of Not Alone Mentoring and any individuals. The processing of this data will sometimes be needed for us to comply with our legal duties and any contractual obligations.

2.2 In some circumstances, we collect and use personal data while relying on the legal basis of 'legitimate interest'. When we believe we have a legitimate organisational interest in using your personal data to contact you, respond to you, or process your details as part of a contract in line with our values, we will process your data in this manner whilst making sure there is no overriding prejudice that will negatively affect you.

2.3 Due to the nature of Not Alone Mentoring's operational needs, we will often need to process special category data, including information regarding health, ethnicity, religion and criminal records information. We will only process special category data when we have a lawful basis to do so and explicit consent from the individual has been provided. We may need to collect special category data to:

- Provide support to students who may have special educational needs
- To provide student or staff support in relation to medical or health needs
- In relation to the employments of staff, e.g. DBS checks
- For legal and regulatory purposes, such as diversity monitoring and health and safety

3.0 What Personal Data We May Collect And When

3.1 Most often, Not Alone Mentoring receives data from the individual directly, or where the individual is a student, the data is provided by a parent or guardian. Most personal data is received via paper or electronic forms or through email communication. We do also receive data through the course of general interaction or communication.

3.2 Examples of data that we may collect or receive include:

- Personal details (names, dates of birth, addresses, telephone numbers, e-mail addresses and other contact details)
- Bank and financial details
- Photographic and video footage
- Employee and student personnel files in relation to academics, employment and safeguarding
- Survey and questionnaire feedback
- Emergency contact details for next of kin

3.3 We may also request the following special category data:

- Employee and student health information
- Details regarding racial or ethnic origin
- Criminal records information to complete DBS checks

3.4 Depending on your settings or privacy policies for social media, you may give us permission to access personal data from these accounts or services.

4.0 How We Might Use Your Personal Data

4.1 The majority of the data Not Alone Mentoring collects will be used to fulfil the obligations of any daily operational needs or as part of a contract of services we hold with the individual. Data will only be processed and accessed within the organisation by the appropriate members of staff and additional safeguards will apply to the processing of special category data. We will, on occasion, use third parties when processing your data.

4.2 Some of Not Alone Mentoring's processing activity is carried out by third parties (such as IT support systems and cloud storage providers). This activity is monitored by the organisation and there are contractual assurances in place to make sure that data is kept secure and in accordance with the our regulations.

4.3 We will not sell, rent, trade or distribute your personal data to any third parties, unless we have your prior permission or we are required by law to do so. We may sometimes share your data with trusted service providers who are authorised to act on our behalf, such as email delivery, payroll processing and educational service providers. The data supplied to these processors will only be used for the purpose to which they are providing their services.

4.4 Not Alone Mentoring will sometimes need to share individuals' data with other third parties, such as professional advisers, government authorities and appropriate regulatory bodies.

4.5 We do not transfer any personal data to countries outside of the European Economic Area (EEA). If it is ever required to send your information abroad, we will only do so to countries within the European Union (EU) or to a third country that the EU has determined provides an adequate level of protection and where you are able to exercise your rights to access your personal data under the General Data Protection Regulations.

4.6 We will make every effort to ensure that the data you provide is recorded accurately and that it is only passed to companies who comply with the General Data Protection Regulations.

4.7 Any personal data held by Not Alone Mentoring is contained securely within the premises. We are committed to reviewing and enforcing security measures to ensure that all data is not susceptible to loss, damage or use by any unauthorised persons. Staff are made aware of this Privacy Policy and the Data Protection Policy and where necessary will receive appropriate training.

4.8 Data will only be held for a legitimate and lawful reason and only for as long as necessary to fulfil the purpose at which it was originally collected. Most of the personal data we hold will be kept for six years. To satisfy legal requirements, some information, such as details relating to safeguarding or incidents may be held for much longer periods. Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner.

4.9 We will endeavour to keep all personal data that we hold on individuals as accurate as possible. You can help us keep your information up to date by informing us of any changes or if you would like to change the way in which we contact you. If you would like to update the details we hold or change your contact preferences please email not.alone.mentoring@gmail.com.

6.0 Your Rights As A Data Subject

6.1 At any time, any individual is entitled to make a Subject Access Request (SAR) to understand what data we hold on them. Individuals are entitled to request that their data be erased, amended, transferred, for the organisation to stop processing it or for their consent to be withdrawn. The SAR will be subject to certain exemptions and limitations under the Data Protection Law. Certain data that we process may be exempt from the right of access, this may include information which identifies other individuals, information relating to legal cases, examination scripts and educational or professional references relating to any individual. Any Subject Access Requests should be emailed to not.alone.mentoring@gmail.com. All requests will be considered on a case by case basis and provided within the statutory rights of the individual.

6.2 Should you withdraw your consent to us contacting you, we may retain your details on a suppression list to help ensure that we do not continue to contact you. If your consent is withdrawn for any other purpose or you request us to stop processing your

data, the organisation may have another lawful reason to process the personal data in question even without your consent.

6.3 In some cases where consent is required regarding a student, it may be necessary or appropriate given the nature of the processing in question, and the individual student's age and understanding, to seek the student's consent. Parental consent will always expire when the child reaches the age of understanding – or the age at which they can consent for themselves. In such situations and depending on the interests of the child, parents should be aware that they may not be consulted regarding the need for their child's consent.

7.0 Terminology

7.1 Breach - A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

7.2 Consent - Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.

7.3 Data Controller - A person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

7.4 Data Subject - Means an individual who is the subject of personal data.

7.5 Data Processor - Means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

7.6 Legitimate Interest - Processing is necessary for the purposes of the legitimate interests pursued by the controller, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

7.7 Personal Data - Means data which relate to a living individual who can be identified (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

7.8 Third Party - Means any person other than (a) the data subject, (b) the data controller, or (c) any data processor or other person authorised to process data for the data controller or processor.

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