

Impact Initiatives Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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2. What information we collect, use, and why
3. Lawful bases and data protection rights
4. Where we get personal information from
5. How long we keep information
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1. Contact details

Impact Initiatives, Young Peoples Centre, 69 Ship Street, BRIGHTON, East Sussex, BN1 1AE,

Telephone

01273 322940

Email

info@impact-initiatives.org.uk

2. What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third-party referrals**: (Information is collected dependent on the individual's interaction with the organisation. (Not all information is collected for each person))

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Next of kin details

- Photographs or video recordings
- Call recordings
- Service use history
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Information about lifestyle, interests or personal history
- Criminal offence data
- Records of meetings and decisions
- Information about income and financial needs for funding or personal budget support
- Payment details (including card or bank information for transfers and direct debits)
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

We also collect or use the following information to **provide services and goods, including delivery and third-party referrals:** (Information is collected dependent on the individual's interaction with the organisation. Not all information is collected for each person)

- Racial or ethnic origin
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following information to **receive donations or funding and organise fundraising activities:**

- Names and contact details
- Taxpayer information (for Gift Aid purposes)

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Records of consent, where appropriate

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Health and safety information
- Criminal offence data

We also collect or use the following information to **comply with legal requirements**:

- Health information

We collect or use the following personal information for **recruitment purposes**:

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information

- Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect or use the following information for recruitment purposes:

- Racial or ethnic origin (anonymously)
- Health information
- Sexual orientation information (anonymously)

We collect or use the following personal information for **dealing with queries, complaints, or claims:** (Information is collected dependent on the individual's interaction with the organisation. Not all information is collected for each person/complaint)

- Names and contact details
- Address
- Purchase or service history
- Video recordings of public areas
- Video recordings of private or staff only areas
- Call recordings
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

3. Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

4. Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to provide services and goods, including delivery and third-party referrals are:

- Consent - we will have permission from you after we have given you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we must collect or use the information so we can enter or conduct a contract with you. All your data protection rights may apply except the right to object.
- Legal obligation – we must collect or use your information so we can comply with the law. All your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To provide information and support services relevant to the person’s needs and preferences. We use the information to tailor services to the individual’s needs and preferences and to ensure they are eligible for our services. Information is stored with limited access and can be used solely for the purpose intended therefore there is no detrimental effect on the individual, only benefits.
- Vital interests – collecting or using information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information to receive donations or funding and organise fundraising activities are:

- Consent - we will have permission from you after we have given you all the relevant information. All your data protection rights may apply, except the right

to object. To be clear, you do have the right to withdraw your consent at any time.

- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To promote fundraising events to the right people based on their interests and preferences. To thank people for donating to our charity Information is stored with limited access and can be used solely for the purpose intended therefore there is no detrimental effect on the individual, only benefits.

Our lawful bases for collecting or using personal information for service updates or marketing purposes are:

- Consent - we will have permission from you after we have given you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - This enables us to send information of interest to people who have asked for this. Information is stored with limited access and can be used solely for the purpose intended therefore there is no detrimental effect on the individual, only benefits.

Our lawful bases for collecting or using personal information to comply with legal requirements are:

- Consent - we will have permission from you after we have given you all the relevant information. All your data protection rights may apply, except the right

to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we must collect or use the information so we can enter into or carry out a contract with you. All your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for recruitment purposes are:

- Consent - we have permission from you after we have given you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we must collect or use the information so we can enter into or carry out a contract with you. All your data protection rights may apply except the right to object.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We collect health information from our staff so we can support them with any adjustments they may need. We also are required to collect information for safeguarding and for gender specific services staff. Information is stored with limited access and can be used solely for the purpose intended therefore there is no detrimental effect on the individual, only benefits.
- Vital interests – collecting or using information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing, or shelter. All your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

- **Consent** – we will have permission from you after we have given you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legal obligation** – we must collect or use your information so we can comply with the law. All your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We would need information to be able to investigate a complaint as described in our contracts and in the best interest of our clients and other stakeholders. Information is stored with limited access and can be used solely for the purpose intended therefore there is no detrimental effect on the individual, only benefits.

5. Where we get personal information from

- Directly from you
- Family members or carers
- Other health and care providers
- Social services
- Charities or voluntary sector organisations
- Schools, colleges, universities, or other education organisations
- CCTV footage or other recordings
- Councils and other public sector organisations

5. How long we keep information:

(L = Legal / D = Discretionary)

Data	Timescale	Responsibility	L or D
Staff and volunteer application forms	1 year after leaving (Summary record must be kept as below)	Central services Coordinator	L
Application forms of unsuccessful applicants	6 months	Central services Coordinator	D
Summary record of service	10 years after employment ends	Central Services Coordinator	L
Payroll and tax information	6 years	Head of Finance	L
Sickness records	3 years	Central Services Coordinator	L
Annual leave records	3 years	Central Services Coordinator	L
Individual staff meeting notes	1 year	Line manager	D
Unpaid or special leave	3 years	Central Services Coordinator	L
Annual appraisal records	5 years	Central Services Coordinator	L
Records relating to promotion, transfer, training, disciplinary matters	1 year after end of employment	Central Services Coordinator	L
Incident forms	3 years	Central Services Coordinator	
References given	5 years after end of employment. Basic information on dates employed only	Central Services Coordinator	L
Records relating to accidents or injuries	12 years	Central Services Coordinator	L

Data	Timescale	Responsibility	L or D
Safeguarding	7 years after last contact If a member of staff is implicated data needs to be kept up to their 65 th birthday or for ten years whichever is longest	Safeguarding Lead	L
Safeguarding Records of Concern	2 years	Safeguarding Lead	D
Client referral forms in and out of the organisation	Up to 2 years after end of service	Service manager	D
Information regarding clients to and from other organisations	Up to 6 months after end of service Basic details ie start and end date with initials	Service Manager	D
Notes from client meetings	Up to 6 months after end of service Basic details i.e. start and end date with initials	Service Manager	D
Electronic client data including emails	Up to 6 months after end of service Basic details i.e. start and end date with initials	Service manager	D
Counselling records	3 years from end of service	Service Manager	D
Agreements with clients	Up to 6 months after end of service. A basic information sheet may be kept for longer e.g. Name and dates involved in service.	Service Manager	D
Registers of attendance	3 months but retain numbers/anonymised data logged for monitoring purposes if required e.g. 3 new attendees, 40 in total attended	Service Manager	D
Transport lists	1 month	Service manager	D
CCTV footage	28 days to 4 months	Service Manager	D

Exceptions

At times it may be reasonable to keep client information for longer than the timescale stipulated above, for example if a client is likely to return to the service and the information would be conducive to providing a service in the clients' best interests.

This is permissible if it adheres to the principle of shall not being kept for longer than is necessary for the purpose or purposes it was given and consented for.

6. Who we share information with:

Others we share personal information with (Information is shared dependent on the individual's interaction with the organisation. Not all information is shared for each person)

- Other health providers (e.g. GPs and consultants)
- Charities and voluntary organisations
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Local authorities or councils
- Relevant regulatory authorities
- Organisations we are legally obliged to share personal information with
- Professional consultants

7. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we have used your data after making a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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