



A New Way of Being

Data Protection and Privacy Policy

A New Way of Being employees, volunteers and representatives shall always operate within the law relating to data protection, complying with all legislative and regulatory requirements, and any other external obligations. All personal data shall be obtained, maintained, stored, used and shared only in strict accordance with the relevant legislation.

A New Way of Being Employees, Volunteers and Personnel responsible for using personal data must make sure the information included in personal data is:

1. used fairly and lawfully
2. used for limited, specifically stated purposes
3. used in a way that is adequate, relevant, and not excessive
4. accurate
5. kept for no longer than is necessary
6. handled according to people's data protection rights
7. kept safe and secure
8. not transferred outside the UK without adequate protection (see SLA) and destroyed immediately after the group returns

A New Way of Being Data Protection Officer will ensure that this is applied in all cases.

GDPR

When Entering into a contract with A New Way of Being we will require personal information from you about you, your family, school, setting or service. For Example, your child's name, contact details, delivery details, and correspondence with us about the contract.

We require certain information to enable us to carry out our contract with you and you must provide this to enter into a contract with us.

This information generally includes:

- Your name
- Your child's name
- Your child's date of birth
- Your email address
- Your phone number
- Your address
- The name and contact details of your child's school Other

We will need to communicate and interact with you via email, telephone, post, SMS or via our website and this correspondence may contain personal or sensitive data relating to your case such as session plans and reports, enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organisation. Any information relating to a contract you

have with us will be held by us for 7 years after our support has ended to help us to be able to manage any enquiries or claims relating to that case. Any other information is also kept for seven years. We also collect details of phone numbers used to call our organisation and the date, time and duration of any calls. We use that information to contact you and carry out our contracts with you and for our legitimate interests in dealing with a complaint or enquiry and administering any services we offer, as well as to review and improve our offerings, including troubleshooting, data analysis, research, statistical and survey purposes.

We may also collect your name and contact details (such as your email address, phone number or address) so we are able to share information about our products and services which may be relevant to you. We may collect this directly from you, or through a third party. You always have the right to “opt out” of receiving our training or support offers.

If you receive any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you “opt-out” of our marketing materials, you will be removed from our emailing list. A New Way of Being is committed to data protection and the protection of the “rights and freedoms” of individuals whose information A New Way of Being Collects and processes in accordance with the General Data Protection Regulation (GDPR). Compliance with the GDPR is described by this policy and other relevant company policies, along with connected processes and procedures. Partners and any third parties working with A New Way of Being and who have or may have access to personal data, will be expected to have read, understood and to comply with this policy. If you have any questions about this notice or how we collect and use personal information about you, please email-info@anewwayofbeing.online.

Special Categories of Data.

There is stronger legal protection for more sensitive information, such as:

1. Ethnic background
2. Political opinions
3. Religious beliefs
4. Health
5. Sexual health / sexual orientation
6. Race
7. Criminal records
8. Trade union membership
9. Genetic and biometric data

A New Way of Being will process special categories of data when the following applies:

1. A parent/guardian/carer has given explicit consent to the processing
2. The data must be processed by A New Way of Being to carry out our legal obligations
3. The data must be processed by A New Way of Being for reasons of substantial public interest and safeguarding.
4. The individual has already made the data public

A New Way of Being does not need your consent if special categories of personal data are used in order to carry out our legal obligations.

Anytime personal data is shared with another party a secure mailing system such as Egress Switch should be used.

All A New Way of Being Personnel are required to familiarise themselves with A New Way of Beings Data Protection Policy and attend relevant training

Handling Data

Information relating to individuals supported by A New Way of Being through the work of the organisation will be dealt with in the following manner: A New Way of Being Personnel can only store personal data that is relevant and necessary to their work, this must be stored in accordance with this data protection policy. It will be carefully destroyed when no longer needed and in accordance with up-to-date guidance. Information that is of vital importance to the future protection of an individual will be securely archived and stored as long as express agreement is obtained from the data subject.

All personal data must be protected by appropriate security measures to safeguard against unauthorised or unlawful processing of personal data. Electronic files will be locked, and the password will be stored by the *Data Protection Officer*. Paper documents, files, discs, USB devices and hard drives will be stored in a locked cabinet. The storage of any data relating to young people is strictly prohibited on personal devices.

All A New Way of Being Personnel must only access and use data that is relevant to and necessary to the performance of their job function. The destruction of all material containing personalised details should be by means of shredding or by deleting from all electronic storage.

Personal Data will always be treated with the utmost confidence and not divulged outside the charity apart from on a "need to know" basis in the following circumstances:

1. If the young person is under 18 and physical, sexual or emotional abuse is suspected
2. If a young person under 18 reports or alleges abuse
3. If the life of the young person or another is at risk
4. If information is revealed about criminal activity
5. If a young person could cause harm to themselves or others
6. If A New Way of Being Personnel have reasonable cause to believe a young person is suffering or likely to suffer significant harm

When emailing personal data, A New Way of Being Personnel should de-personalise the data where possible and only send what is necessary. When posting personal data, A New Way of Being Personnel should send this by recorded delivery. A New Way of Being Personnel should make recipients aware that they are receiving personal data and check that they will handle according to the Data Protection Act.

Your rights

You have several rights that cover you and your personal data under Data Protection. With regards to any Personal Information, we hold about you, your family or Service we have outlined your rights below. More information about your rights can be obtained from the Information Commissioner's Office (ICO).

Under certain circumstances, by law you have the right to:

- Be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please just ask us.
- Request access to your personal information (commonly known as a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information in circumstances where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and you are refuting the existence of a valid legitimate interest.
- Request the transfer of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.

- Withdraw your consent. In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- Lodge a complaint. If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).
- To exercise your rights as defined under GDPR and highlighted in this section, please contact us at info@anewayofbeing

Changes to this privacy notice

We will always ensure that any changes we make to our privacy notice in the future will be posted on our website and where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice.

Exceptions

The only time information would be given to another agency without an individual's prior knowledge or permission is when:

1. There is immediate risk to an individual's life
2. There is a child at risk

Further information can be found on the government website: <https://www.gov.uk/data-protection/the-data-protection-act>

This policy was Reviewed on 08th Jan 2023

On behalf of Directors of A New Way of Being **Samantha Young**

For more information or to discuss anything within this policy further please contact us via info@anewayofbeing.online. www.ANewWayBeing.online

This policy will be reviewed annually by the company Directors ; Review Date November 2024