1.INTRODUCTION

Joint Activities & Motor Education Service (JAMES) is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

This Privacy Policy applies to anyone that JAMES comes into contact with, including but not exclusively; members, volunteers, participants, clients, customers, the general public, professional contacts.

We will never sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

**Questions?** Any questions you have in relation to this policy or how we use your personal data should be addressed to the JAMES Management Team, Eric Gibbs Centre, Frizinghall Rd, Bradford, BD9 4JB.

2. WHAT INFORMATION WE COLLECT

**Personal data you provide**

We collect data you provide to us in the course of our usual operations. This includes information you give when joining or communicating with us.

For example:

· personal details (name, date of birth, email, address, telephone etc.) when you become a participant, client, customer, volunteer etc

· Medical and emergency contact details when you register with us or other times when this is necessary.

**Information created by your involvement with JAMES**

Your activities and involvement with JAMES will result in personal data being created. This could include details of how you’ve helped us by volunteering or being involved in our activities or the areas we have supported you or your family with.

**Information from third parties**

We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to another charity we’re collaborating with on a project).

Your information may be shared with us by independent third parties when you have indicated that you wish JAMES to support you. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

**Sensitive personal data**

Due to the programmes JAMES delivers, on certain projects we do collect and store sensitive personal data (such as information relating to health or beliefs). If we ask you for this information we will make it very clear why it is needed (for example because a young person attends our alternative provision, or you’re on a JAMES family support programme) and we’ll take extra care to ensure your privacy rights are protected.

**Accidents or incidents**

If an accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers) then we’ll keep a record of this (which may include personal data and sensitive personal data). We may also be required to share this with the appropriate statutory bodies and partners.

**Volunteers**

If you are a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us and you (including in the event of an insurance or legal claim) and for safeguarding purposes.

3. HOW WE USE INFORMATION

We only ever use your personal data with your consent, or where it is necessary in order to:

· enter into, or perform, a contract with you

· comply with a legal duty

· protect your vital interests

· for our own (or a third party’s) lawful interests, provided your rights don’t override these.

In any event, we’ll only use your information for the purpose or purposes it was collected for (or else for closely related purposes):

**Administration**

We use personal data for administrative purposes (i.e. to carry on our charity work).

This includes:

· maintaining databases of our volunteers, members and supporters

· performing our obligations under contracts

· delivering services

**Anonymised data**

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as research, evidencing our impact, recruiting new clients or to identify trends or patterns within our existing client base. This information helps inform our actions and improve our services and materials.

3. DISCLOSING AND SHARING DATA

We will never sell your personal data.

We may share personal data with subcontractors or suppliers who provide us with services. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure. We will share personal information with the appropriate authorities, if we consider it to be a safeguarding incident or concern of harm. Any such sharing is in accordance with our Safeguarding Policy. Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend a programme jointly organised by us and another organisation). We’ll only share information when necessary and for the purposes that you have provided the data to us.

4. PARTICIPANTS OF OUR PROGRAMMES, INCLUDING CHILDREN, YOUNG PEOPLE & ADULTS WITH LEARNING DIFFICULTIES

It is necessary for us to collect personal data in order to deliver our services and programmes safely and effectively (for example medical information for Health & Safety purposes). When we collect and manage information from children & young people (under the age of 18) or adults with learning difficulties in particular, we aim to collect it in a way which is appropriate for the age or level or understanding of the individual. We won’t use this personal data unless fully informed consent has been gained by participants and, for individuals under 18 or adults with learning difficulties, their parent/legal guardian.

Permission from parents or legal guardians: If the individual is under 18 or is an adult with learning difficulties, we will gain informed consent from a parent or legal guardian for them to attend events and activities, as well as marketing (particularly photographs or video), research and evidencing our impact.

5. UNDERSTANDING OUR IMPACT

As a learning organisation we seek to understand and evidence the impact of what we do and develop our offer based on that. To allow us to do this we need to collect data from both adults and young people. When we collect this information we aim to manage it in a way which is appropriate for the age and understanding of the individual. The information can be collected before, during and after a programme or through wider consultation / research (for example personal demographics, case studies, or evidence of a change in outcomes). We will not use this personal data for marketing purposes and we won’t profile it, unless permission has been gained and/or it has been anonymised.

6. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use, or disclosure, of your personal information. Electronic data and databases are stored on secure computer systems and we control who has access to information.

**CCTV**

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and JAMES. CCTV will only be viewed when necessary (e.g. for security reasons or to detect or prevent crime). JAMES complies with the Information Commissioner’s Office CCTV Code of Practice and we put up notices so you know where CCTV is in use.

7. STORAGE

**Where we store information**

JAMES operations are based solely in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, however these transfers will be subject to adequate data protections.

**How long we store information**

We will be required to make sure that we use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. We will regularly review what information we hold and delete what is no longer required. Please see the JAMES Record Retention Policy for additional information.

8. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights:

· the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request)

· the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)

· the right to have inaccurate data rectified

· where technically feasible, you have the right to see personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract.

This information will be provided in a common electronic format. Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please email [enquiries@jamesuk.org](mailto:enquiries@jamesuk.org) or write to the Management Team, JAMES, Eric Gibbs Centre, Frizinghall Rd, Bradford, BD9 4JB

If you are not happy with our response relating to your data protection rights, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner’s Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

9. COOKIES AND LINKS TO OTHER SITES

**Cookies**

Our website uses local storage (such as cookies) to provide you with the best possible experience and to allow you to make use of certain functionality. Our website ([www.jamesuk.org](http://www.jamesuk.org) ) may contain hyperlinks to other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working). If an external website requests personal information from you, the information you provide will not be covered by the JAMES Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

**Social Media Sites**

We operate a number of social media pages (including Facebook, Twitter and Instagram). Although this policy covers how we will use any data collected from those pages, it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

10. CHANGES TO THIS PRIVACY POLICY

We’ll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

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