



## Youth Consultation Privacy Notice

**Date reviewed: May 2023**

**Date next reviewed: June 2024**

**Data controller:** Participation People, Delandale House, 37 Old Dover Road, Canterbury, Kent. CT1 3JF.

**Data protection officer:** Antonia Dixey, Chief Executive Officer

### Introduction

As part of our day to day work, The Participation People (the “Company”) collects and processes data relating to young people. We are committed to protecting the privacy and security of their personal data. This privacy notice sets out how we collect and use that data and how we meet our data protection obligations.

Further information on the Company’s commitment to complying with our data protection obligations, individuals’ rights and obligations in relation to the processing of personal data whilst working for or on behalf of the Company, and the basis on which we will process any personal data we collect or that is provided to us, can be found in the Company’s Data Protection Policy.

### What information does the Company collect?

The Company collects and processes the following categories of information about young people:

- **personal contact details** such as young people’s name, title, home address, personal email address and contact telephone numbers (as provided by young people and parents in consent forms and through surveys where there is a free prize draw.)
- **details of their skills, views, opinions and lived experiences and** other information included in their consent form or consultation responses.
- **information about their background** through an anonymous equal opportunity form or questions on a survey. This is voluntary for young people to complete.

We may also collect and process the following “special categories” of more sensitive personal data:

- whether or not young people have a disability for which the Company needs to make adjustments;
- medical history including allergens;
- Support and additional needs.

### **How will the Company collect this personal data?**

The Company collects this information in a variety of ways: from correspondence with young people; from information contained in consent forms, through surveys, text messages and social media polls; or collected through interviews, meetings or other forms of assessment, and other information provided directly by them.

Internet searches may be used by the Company as part of due diligence processes on young people in the course of safeguarding and wellbeing concerns. Social media platforms, which may include Facebook, Twitter, TikTok, Snapchat, LinkedIn and Instagram may be viewed for these purposes.

The Company may also collect personal data about young people from third parties, such as schools, social services and youth groups. The Company will seek information from third parties only if there is a safeguarding and or wellbeing concern about that young person.

### **Where will personal data be stored?**

Data will be stored on the Company's IT systems (including the Company's email system, software that is GDPR compliant and on work phones).

All IT systems are encrypted and have restricted access with two-factor authentication (2FA).

They are protected by password access, a firewall and anti-virus software. They can be remotely located and deleted.

### **Why does the Company process personal data?**

The Company needs to process young people's data prior to them attending a session to run fun, effective, accessible, inclusive and safe: workshops, sessions, events, projects, activities and consultations.

The Company also needs to process young people's voice, opinion, lived experience through structured consultations and engagement activities.

These could be:

- run online
- through text message
- social media campaign
- through face to face focus groups

At all times, the data from these consultations will be anonymised.

Where young people submit their contact details to find out more information about a project or consultation, a data and privacy statement will be included for them to read and check.

From time to time, the Company runs free prize draws to encourage young people (and schools as well as youth and faith groups) to take part in consultations and surveys. Young people are asked to give their contact details to enter into a prize draw. Where they enter this information, that data will only be used to choose the winners. It will be deleted 3 months after the competition winner has been announced and prizes awarded.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, if there is a safeguarding or wellbeing concern or trips abroad or overnight (e.g. residential trips) with young people.

The Company has a legitimate interest in processing personal data and for keeping records of the process. Processing data from young people allows the Company to manage effective projects, campaigns and consultations.

The Company will process the “special categories” of data listed above in the following circumstances:

- where we need to carry out our legal obligations or exercise rights in relation to young people’s attendance or taking part in a project.
- where it is needed in the public interest, such as for equal opportunities monitoring; and
- in limited circumstances where it is needed in relation to legal claims.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. This includes a project consent form for young people and parent’s to complete before they participate in our projects.

We will use the “special categories” of personal data in the following ways:

- **We will use information about young people’s physical or mental health, or disability status,** to ensure all young people’s health and safety and to provide appropriate adjustments where appropriate.
- **We will use information to ensure meaningful equal opportunity monitoring and reporting.** Data that the Company uses for these purposes is anonymised and or is collected with young people’s and parent’s express consent, which can be withdrawn at any time. Young people are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

The Company will not use young people’s data for any purpose other than the project for which that young person has applied to take part in.

### **Who has access to data?**

Young people’s information may be shared internally for the purposes of safeguarding and or wellbeing concerns. It will be shared with the “on duty” safeguarding lead when young people are taking part in events, trips and activities.

The Company will not share young people’s personal data with third parties unless there is a safeguarding and wellbeing concern or legal requirement to do so. The Company will then

share young people's data with third parties in order to keep young people safe from harm and report any concerns to the appropriate authority; seeking their consent where appropriate.

The Company will not transfer your personal data to countries outside the European Economic Area.

### **How does the Company protect data?**

The Company takes the security of young people's data seriously. It has internal policies and controls in place to prevent young people's data from being lost, accidentally destroyed, misused or disclosed, and to ensure it is not accessed except by the Company's employees in the proper performance of their duties.

Young people's records are stored on the Company's IT system, which is encrypted and protected by 2FA and password access, a firewall and anti-virus software. Their consent forms for their participation in a project are stored in paper version at the project office, locked in a secured office and filing cabinet until they are also scanned onto the Company's IT systems. At such time, they are shredded and destroyed confidentially.

We have put in place procedures to deal with any suspected data security breach and will notify them and parents and any applicable regulator of a suspected breach where we are legally required to do so.

### **For how long does the Company keep data?**

The Company will hold young people's data on file for the purposes of satisfying any legal, accounting, or reporting requirements. At the end of that period their data is deleted and/ or destroyed.

Once their involvement in a project ends, paper files (where they exist) are shredded and disposed of through confidential waste. Their online record is saved until the appropriate destruction date.

In some circumstances we may anonymise young people's personal information so that it can no longer be associated with them, in which case we may use such information without further notice to them. For example, to write a case study to help us and others learn from young people's lived experiences and to inform decision making.

### **Young people's rights**

As a data subject, young people have a number of rights. They can:

- access and obtain a copy of the personal data we hold about them on request.
- require the Company to correct inaccurate or incomplete personal data.
- require the Company to delete or stop processing their personal data where there is no good reason for us continuing to process it or where they have exercised their right to object to processing (see below).
- object to the processing of young people's personal data where the Company is relying on its legitimate interests (or those of a third party) as the legal ground for processing

- request the restriction of processing of their personal data. This enables them to ask us to suspend the processing of their personal data, for example if they want us to establish its accuracy or the reason for processing it

**If you or your parent would like to exercise any of these rights, please contact [antonia@participationpeople.com](mailto:antonia@participationpeople.com).**

**If you believe that the Company has not complied with your data protection rights, you have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.**

It is important that the personal information we hold about young people is accurate and current.

Young people will not normally have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if young people's request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In the limited circumstances where young people's personal data is processed based on their consent for a specific purpose, they have the right to withdraw consent for that specific processing at any time.

**To withdraw consent, please contact [antonia@participationpeople.com](mailto:antonia@participationpeople.com). Once we have received notification that you have withdrawn your consent we will no longer process young people's information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.**

### **What if young people do not provide personal data?**

Young people are under no statutory or contractual obligation to provide data to the Company, unless they are attending a session, activity, project or event hosted by us.

However, if they do not provide the information, the Company may not be able to allow them to attend due to safeguarding, wellbeing and safety concerns.

**If you have any questions about this privacy notice or how we handle your personal information, please contact [antonia@participationpeople.com](mailto:antonia@participationpeople.com).**