

Groundwork Greater Manchester: General Privacy Notice

The General Data Protection Regulations (GDPR)

This privacy notice is available to all our stakeholders and explains how we intend to collect, manage, update and protect all personal or business information retained by Groundwork Greater Manchester.

Introduction

Groundwork Greater Manchester is a Company Limited by Guarantee (No: 6543150) and a registered Charity (No: 1124508), delivering a wide range of contracts, services and funding programmes, either directly, or in partnership with or on behalf of other third-party organisations including local, regional and national cross sectoral organisations, such as Local Authorities, Government departments, Civil society agencies and local community organisations. Groundwork Greater Manchester also receives funding from the National Lottery; European Structural Fund and other grant making bodies.

Groundwork Greater Manchester respects your privacy and is committed to protecting your personal data and being transparent about how we collect and use your data. We will comply with any data protection legislation currently in force (currently the Data Protection Act 2018). This Privacy Notice, together with our Terms of Use, explains how we use any personal information that you provide or which is provided to us by third parties.

When you engage with us for the first time, we will make you aware of any specific marketing or project /service requirements that mean we want/need to retain and possibly share data with third parties and seek your consent to do so. In addition, you will always be provided with project, marketing or contract specific Privacy information.

By visiting our website, using any of our apps, or responding to social media posts, you are accepting and consenting to the practices described in this Notice, so please read it carefully. Any changes we make to this Privacy Notice will be posted on this page, so remember to check back again if you are a regular user.

Groundwork Greater Manchester is committed to protecting the privacy of all of our customers, beneficiaries, partners, employees, trustees and sub-contractors (stakeholders). We will ensure that personal or business information is retained in a secure environment and not shared with any third party without specific written consent (except where consent is not required in line with current data protection legislation).

When we are not the lead partner/contractor, we will make you aware of the specific individuals responsible for controlling the use, and on-going security of your personal or business information. The Data controllers listed below will retain responsibility for the effective management and control of your personal or business information during your interaction with Groundwork Greater Manchester.

Groundwork Greater Manchester Data Processor/Data Controllers:

Senior Data Controller Mike Ormerod: michael.ormerod@groundwork.org.uk

Deputy Data Controller Gary Cunningham: gary.cunningham@groundwork.org.uk

Tel:

0161 220 1000

or write to:

Mike Ormerod - Senior Data Controller
Groundwork Greater Manchester
Trafford Ecology Park
Lake Road
Manchester
M17 1TU

Groundwork Greater Manchester ICO registration number: Z1522668

Groundwork Greater Manchester and its partners are often required to collect and store personal and business information in the main, for the duration of a given project or contract. Before collecting and storing your personal or business information we will always seek your consent and provide details of any existing, or subsequent arrangements for the safe and secure storage of your information, the restrictions we will apply to its use, and any third parties involved in the delivery of a specific project or contract.

We collect and store securely personal/business information relating to the following individuals and businesses/agencies:

- Employees
- Trustees
- Learners and other beneficiaries
- Volunteers including our trustees
- Funders, clients, potential clients and contracting bodies
- Service providers
- Delivery partners
- Supporters
- Service users and project participants, including for example people from community groups
- Website users (as per this [statement](#))

Information we will collect and retain with your consent

Groundwork Greater Manchester along with any third partner organisations is responsible for the secure management of your personal information as designated 'Data Controllers'.

With your continuing consent, we will maintain your personal /business details, for the specific purposes outlined in this notice including: evidence of eligibility for a programme or contract; personal HR records such as a contract of employment if you are employed by Groundwork Greater Manchester ; paperwork relating to financial and or other benefits received by you as a result of participation on a project or as a service user ; service agreements with partners statutory agencies

and funders; non sensitive and sensitive information provided during any formal engagement with Groundwork Greater Manchester by any of our stakeholders.

Through our Customer Relationship Management (CRM) system we also hold the personal data of individuals who we have reasonable and legitimate reasons to assume are interested in our services, including partners, supporters and business clients.

We will always restrict the use of personal /business information for the purposes of reporting information to our funders or contract holders and will contact you directly to gain your consent should we have any other purpose in mind. We may for example, want to get in touch from time to time in order to provide an update about one of our services or products. You would retain the right to opt out of receiving information from Groundwork Greater Manchester at any time by email, text or letter.

In order to promote our work more widely, we often ask participants and service users to engage in the making of videos or other forms of promotion e.g., Digital images or sound recordings. We will also contact you, and gain your further consent, if we want to use your images for any subsequent promotions. You retain the absolute right to deny any request made by Groundwork Greater Manchester to retain and or use your images /recordings and or personal information for the purposes of marketing Groundwork Greater Manchester or any other use without your specific written consent.

Please Note: Groundwork Greater Manchester will not share your personal /business information with any third party without your written consent and only when they are able to confirm compliance with GDPR. Examples of agencies/situations where we may share your personal data with after receiving your consent) include:

- funding bodies/lead contractors (details will be provided to you at the point of engagement)
- for project /contract monitoring purposes.
- Groundwork Greater Manchester accredited Third party organisations engaged in specific project /service delivery
- if it becomes desirable or necessary to refer a participant to a Specialist provider for support or when a transfer of project /contract between partners is required
- Local authority agencies and their GDPR accredited delivery parties
- debt collection agencies, but only when an organisation or an individual fails to pay Groundwork Greater Manchester after an agreed payment period, and for the purposes of pursuing late payments after 90 days duration
- to check that an individual is eligible for a Groundwork Greater Manchester project /service
- to obtain references for new staff volunteers & service providers
- to monitor progress of third-party organisations delivering project and /or contract activity on behalf of Groundwork Greater Manchester or as a partner
- to report progress to partners / funding and /or contracting organisations
- Groundwork Greater Manchester may also contact you on occasion to gain your feedback regarding your experience of a project or service provided by us
- to monitor and promote equality & diversity
- for project or contract evaluation purposes

Please note:

You will retain the right to opt in or out of sharing your personal data for the purpose of evaluating the programme/service delivery by completing the declaration form at the initial point of your engagement with Groundwork Greater Manchester.

We may on occasion also seek your consent for other third parties to contact you about other programmes and activities, services, and employment opportunities. We will not however share any personal information with any other commercial entities outside this specific remit.

Storing your data

Your personal /business information will be stored securely either as a paper or encrypted digital copy on a secure server and retained for a specific period of time that will be clearly set out to you at the point your engagement with Groundwork Greater Manchester or an accredited third party.

Basic personal data may also be held on our Customer Relationship Management system (Salesforce) and/or on our email marketing system (Campaign Monitor).

Your personal /business information will not be stored for longer than is necessary and once it is no longer required, it will be disposed of in accordance with General Data Protection Regulations (GDPR).

All personal data held by Groundwork Greater Manchester is set out in our **Records of Processing Activity (ROPA's)**. Each service area at Groundwork Greater Manchester maintains a ROPA relating to its activity and the information includes:

- Who the data subjects are
- Reason for holding the personal data
- Lawful basis for processing the data
- Categories of personal data held
- How the information is collected
- Where/how the data is stored
- Information on any data shared with third parties
- How long the data will be held for

How do we use your data?

We may use your personal information for:

- Delivering and personalising our services
- Dealing with your enquiries, requests and complaints
- Providing you with information about our work activities events and services
- Complying with our legal obligations
- Administering beneficiary records
- Fundraising and marketing
- Conducting market research

Your rights under the General Data Protection Regulations

Under the General Data Protection Regulations (GDPR), you have the following rights:

- a. the right to be informed
- b. the right to access your personal information
- c. the right to edit and update your personal information
- d. the right to request to have your personal information deleted

- e. the right to restrict processing of your personal information
- f. the right to data portability
- g. the right to object- including automated decision making and profiling
- h. the right to lodge a complaint with a supervisory authority

If you wish to exercise your rights, please contact us, providing as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 30 days before they take effect.

a. The right to be informed.

You have the right to be informed about the data we hold and share about you. This will be described to you in the service specific information leaflet if you are a service user or through yourline manager if you are a member of staff or a volunteer or through our privacy notice above.

b. The right to access your personal information

You have a right to access your personal data. By making a subject access request to Groundwork Greater Manchester you can find out what personal data we hold about you, why we hold it and who we disclose it to. You must make a subject access request in writing and include proof of your identity – you can email: greatermanchester@groundwork.org.uk with the subject “Data Access Request”

Or write to:

Data Protection Officer, Groundwork Greater Manchester, Trafford Ecology Park, Lake Road, Stretford, Manchester M17 1TU

Once we have received your request, and verified your identity, we will respond within one calendar month.

c. The right to edit and update your personal information

The accuracy of your personal information is important to us. You can edit your personal information including your address and contact details at any time.

d. The right to request to have your personal information deleted

You have the right to request the deletion of your personal information which we will review on a case-by-case basis.

e. The right to restrict processing of your personal information

You have the right to 'block' or suppress processing of your personal data. However, we will continue to store your data but not further process it. We do this by retaining just enough of your personal information so we can ensure that the restriction is respected in the future. Please note, this is not an absolute right and only applies in certain circumstances.

f. The right to data portability

You have the right to get your personal data from us in a way that is accessible and machine readable, for example as a csv file. You also have the right to ask us to transfer data you have provided us with to another organisation where technically feasible.

g. The right to object

You have the right to object to your personal information being processed for marketing (including automated decision making and profiling) and for research purposes. From the very first communication from us and every marketing communication we send after you will have the right to

object to marketing. If we process your personal information for the exercise or defence of legal claims, or we can demonstrate compelling grounds that override your rights and freedoms we may not be able to fulfil your request. However, we will contact you to discuss further.

h. Your right to lodge a complaint with a supervisory authority

If you wish to lodge a complaint or seek advice from a supervisory authority please contact:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: +44 (0) 01625 545 745
Website: www.ico.org.uk

Please also note the following important information:

- If you are unsure about the source of an email purportedly from Groundwork Greater Manchester please phone one of our data control team first to confirm the contact is from us
- Groundwork Greater Manchester will not contact you about financial products or any related financial; service provided by a third party
- Electronic communications from Groundwork Greater Manchester will contain an 'unsubscribe' link
- You can ask us to remove your personal or business information at any time by contacting one of the Data Controllers listed below (by email or phone)
- We will not sell, distribute or lease your personal information to third parties in any circumstances unless we have your prior specific written consent
- If you believe that any information we are holding on you is incorrect or incomplete, please contact one of the Data Controllers listed below as soon as possible. We will correct any information found to be incorrect as soon as practically possible but within 7 days of receiving notice
- You may request details of personal information which we hold about you, there is no fee associated with providing this service
- If you would like a copy of the personal /business information we retain about you and or your business, please contact the Data Controllers listed above either by email, phone or post
- You may access any of your personal /business information by giving us 7 days' notice at any time during your engagement with Groundwork Greater Manchester

Mike Ormerod
Senior Data Controller
November 2021