

## Voluntary Sector North West (VSNW) Privacy Notice

### About Us

**VSNW** is the regional voluntary sector network for the North West, whose purpose is to ensure that the voluntary, community and social enterprise sector, in all its diversity, takes its full part in shaping the future of the North West. VSNW is incorporated as a Company Limited by Guarantee (registration number 3988903) and registered as a Charity (registration number 1081654). VSNW is registered with the Information Commissioner's Office (registration number ZA271106) and you can find out more about our work at [www.vsnw.org.uk](http://www.vsnw.org.uk)

VSNW works in partnership with other VCSE sector organisations on a number of programmes, for example the Answer Cancer programme which aims to provide a co-ordinated cancer screening prevention and screening awareness engagement programme across Greater Manchester.

### What data do we collect?

Our work is to engage with community organisations, frontline staff, volunteers and the general public. This means we hold a range of personal data including:

- personal information (such as name, address, date of birth, telephone number, email address, images, audio recordings, IP addresses)
- characteristics information (such as gender, age, ethnic group)
- health information (e.g. previous cancer diagnosis)
- employment related information (such as who you work for, role)

### How do we collect your information?

VSNW collects your personal information from a range of contact points including paper-based forms, telephone, images, voice recordings and the VSNW website. Each collection point contains a brief privacy notice relating to its specific use and signposting to this overall statement.

### What do we do with your information?

The data we collect and how we use it depends on which of our services you have accessed. These sections will be made available to individuals when they sign up to use those services. Further details on each service can be accessed below or by clicking the link to the appropriate service.

1. [Cancer Champions](#)
2. [Training and events](#)
3. [VSNW website](#)
4. [Research and monitoring](#)
5. [Photography & AV Recordings](#)
6. [Research & Evaluation](#)
7. [Mailing lists & Ebulletins](#)
8. [Texting & phone communications](#)
9. [History Makers](#)

## Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information; these will change, depending on the service you are accessing. We consider the following grounds to be relevant:

- Specific Consent: Where you have provided specific consent to us using your personal information in a certain way, such as to send you email or newsletter.
- Performance of a contract: To enable us to provide products or services to you such as training or receiving a service.
- Legal obligation: Where necessary, so that we can comply with a legal or regulatory obligation to which we are subject.
- Vital interests: Where it is necessary to protect life or health (e.g. in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue that requires us to share your information with the emergency services.
- Legitimate interests: Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights). Examples of this include:
  - Sending you specific related opportunities or information about e.g. events or new training opportunities.
  - Letting you know about research we are conducting to help us improve our services or the lives of people in North West England.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our own interests are overridden by the impact on you, e.g., where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route that is lawfully available (e.g., if we need to process it for social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

## Who do we share your information with?

VSNW will only share information with those that need to know it. Further information on who we share information with is within each service area.

We do share anonymised statistical information and case studies with our funders and commissioners including NHS England – no personal individual can be identified from this data.

Personal information will only be shared with those that need to know it in order to complete our service to you. Examples of this include sharing information about Cancer Champions or attending events.

Where your information is being shared it will be clearly stated at the point of collection whether that is a paper-based form or through our website.

If you have any queries regarding whether your data is shared and the sharing processes we undertake please speak to the member of staff you are working with or alternatively contact Warren Escadale by email: [warren.escadale@vsnw.org.uk](mailto:warren.escadale@vsnw.org.uk)

## **Additional Information sharing**

Your information may also be shared with other people and organisations where the organisations are required by law to do so or with appropriate justification under the Data Protection Act (2018), e.g. where the disclosure is necessary to a public body or another organisation to exercise its statutory functions. An example of this includes where we have a duty of care such as a safeguarding concern.

## **Changing how we use your information**

At anytime you may request that we change how we use your information and withdraw your consent. We will make every effort to comply with your request as soon and as fully as possible. How we do this will depend on several factors such as what information we hold; what it is currently being used for; and ensuring that we comply with our legal obligations.

Specific examples of how you may withdraw your consent, for example to receive our ebulletin, can be found in the ['What do we do with your information?'](#) section below.

## **Detection and prevention of fraud or crime**

By law we are required to protect public funds that we are responsible for. This means we may also use any of the information you provide to prevent and detect fraud. This may involve sharing this information with organisations responsible for auditing or administering public funds including the local authority and NHS England.

When necessary and appropriate information held will be shared with organisations such as the police to prevent or detect crime, apprehend or prosecute offenders or prevent the risk of harm to an individual e.g. safeguarding.

## **What do we do to make sure your information is secure?**

We take our obligations to look after your data very seriously. The information you provide will be subject to rigorous measures and procedures to make sure it cannot be seen, accessed or disclosed to anyone who should not see it.

All staff who can see your information will have undergone specific training around how to handle information properly and have to comply with Information technology and data protection policies and procedures. These set out how your information is protected.

Relevant paper-based information is processed only by VSNW and kept securely within our offices. Additionally, we have self-assessed our IT systems and they meet the current requirements of the government's Cyber Essentials Schemes. Access to your information is also password protected to unique staff accounts and access is limited by the role of the person. This means that if they are not the appropriate person they will not be able to see your information.

## **Transfer of data outside of the European Union**

VSNW's main data base is hosted in the EU and our main technical support contract is provided by a UK-based organisation. We may on occasion utilise contractors that are based outside of the European Union for technical support but we guarantee not to move your data out of the EU.

## **How long will you hold onto my information?**

Information has to be kept for different lengths of time that is often dictated either by law or funding terms and conditions. This can vary from a few months up to several years. Your information will be held for the minimum length of time that these various law and legal regulations state they must be held for.

Where laws do not specify how long information must be kept for the organisation will use recommendations from legal advisors and how long other specialists in the organisations decide it is necessary to keep it for. All decisions that are not based on legal requirements have to be explained.

Due to the many different types of information that are used by VSNW it would not be practical for us to list all of them and the periods they will be held for here. However, if you wish to know the length of time particular information regarding yourself or your organisation is held for, please contact VSNW for further information.

## **Your Data Protection rights**

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

These rights are:

- Your right of access
- Your right to data portability
- Your right to rectification
- Your right to erasure
- Your right to restriction of processing
- Your right to object to processing

## **Your right of access or data portability**

You have the right to ask for access to any of the personal information that VSNW holds about you. This is called the right of access and is commonly known as making a subject access request or SAR. For more information see here: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>

You also have the right to ask that we transfer your data directly to another organisation. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-data-portability/>

VSNW are the accountable body for the programme of work; if you want to ask for this information please contact VSNW's data protection lead – Warren Escadale by email:

[warren.escadale@vsnw.org.uk](mailto:warren.escadale@vsnw.org.uk)

## **Your right to rectification, erasure or restriction of processing.**

If you believe that the information we hold on you is incomplete, incorrect or inaccurate, you have the right to ask us to amend this.

In certain circumstances you may ask that your data be deleted – otherwise known as the “right to be forgotten”. For more information please visit <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>

You have the right to ask us to restrict the processing of your information, meaning how we use your data. For more information, please visit: <https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data/>

To exercise any of these rights, please contact VSNW’s data protection lead – Warren Escadale by email: [warren.escadale@vsnw.org.uk](mailto:warren.escadale@vsnw.org.uk)

## **Your right to object / complain**

You have the right to complain if you feel your information is not being used in the right way. To begin with, it may be better to speak with the member of staff that is working with you to talk through your concerns.

If you do not want to do this, details of our complaints procedure are available on request.

Alternatively, you can contact our data protection lead as follows:

Warren Escadale  
[warren.escadale@vsnw.org.uk](mailto:warren.escadale@vsnw.org.uk)  
0161 276 9300

If you are still not satisfied with your response from VSNW you also have the right to raise a complaint with the Information Commissioner’s Office. For further details on this and your information rights please visit the Information Commissioner’s Office website [here](#).

## **Changes to policy**

The VSNW Trustee Board will review this statement on a regular basis and the updated document will be made available on our website.

## **What do we do with your information? (Services)**

### **1. Cancer Champions**

An individual may sign up to be a Cancer Champion either via our dedicated website using an online form, or in person by completing a hard copy paper form. In both cases, the information provided will be stored in a cloud-based CRM database.

Specific information collected includes: Name; email address; telephone number; area of Greater Manchester where they live or work; ethnicity; age; disability; gender; religion; caring responsibilities; and sexuality.

This information may be shared with partners in the Answer Cancer project. Anonymised or aggregated versions of the data collected may be shared externally.

Any hard copy sign-up forms are securely disposed of once data has been transferred onto our database system. Electronic information will be kept for the lifetime of the project and in line with funders audit requirements.

## **2. Training & Events**

When you register to attend an event we will collect contact information; this may be on a booking form, over the telephone or on an online form.

Depending on the event we will collect information that will enable us to contact you with information relating to the event and ensure that any special needs are provided for. This may include:

- Your name
- Your address
- Your email address
- Your phone number
- Your employer and role
- Any access or mobility issues
- Any dietary requirements

Data will be used to communicate with you about the event you are booking into only. This will include sending confirmations, joining instructions and post event feedback requests.

Your details may be shared in advance with the trainer / facilitator of the event to ensure the best possible course delivery. We also produce statistical reports on our training and events programme using feedback and evaluation forms that are shared with key funders and partners including NHS England and training providers. Your personal details will not be shared with anybody else for marketing or promotional purposes without your prior consent.

Any hard copy booking forms are securely disposed of once data has been transferred onto our database system. Data relating to our training and events programme is kept for 12 months to enable event administration and to enable the completion of annual reports.

## **3. VSNW Website**

Like many organisations our website is a key tool in providing services to you and as a result it does process a range of personally-identifying information. In order to provide you with a positive experience and service. For further details of the information our website collects please visit our specific website privacy notice [here](#).

#### **4. Research and Monitoring**

We will use the information you provide to:

- analyse statistical data so we can plan how we provide services;
- create anonymised data to help improve services and to be published in various reports that will also be publically available.
- create anonymised reports and case studies for our funder and commissioners to demonstrate effective delivery and to enable us to continue service delivery.

By anonymising the data that is used in this way it means that it will not contain any personal information. So you, your family or any individual person cannot be identified from this information.

#### **5. Photography & Audio / Video (AV) Recordings**

VSNW recognises that a photograph or AV recording where an individual is uniquely identifiable is categorised as a “special category of personal data”. Consent is collected during both event registration and event sign-in processes. We also have processes in place to ensure your photograph is not taken if you object / don’t want it to.

Photographs/recordings taken and any reproductions may be used by VSNW for any advertising purposes or for the purposes of illustrating wording. The photographs/recording may be used in promotional material including, but not limited to, promotional flyers, website, posters, social media and display boards, with any reasonable retouching or alteration.

If you wish to withdraw your consent you may do so at any time by contacting VSNW.

Photographs are removed from portable devices as soon as practicable and stored on the servers and IT systems and access is restricted to only relevant partnership staff and volunteers.

#### **6. Research & Evaluation**

We will use the information you provide to:

- analyse statistical data so we can plan how we provide services;
- create anonymised data to help improve services and to be published in various reports that will also be publically available.
- create anonymised reports for our funder and commissioners to demonstrate effective delivery and to enable us to continue service delivery.

By anonymising the data that is used in this way it means that it will not contain any personal information. So you, your family or any individual person cannot be identified from this information.

At VSNW we also periodically conduct a range of research programmes and projects – the full details of how this information will be used will be include in specific project privacy notices.

## **7. Mailing Lists & E-bulletins**

VSNW operates a number of thematic mailing lists e.g. the North West Social Prescribing Network & Cancer Champion, as well as for VSNW and its members. Some of these are sent to organisations as part of our services whilst others are also open to individuals.

Where mailings are to organisations and members then this information is considered by VSNW to be Business Contacts and not personal information. But we are committed to ensure your data is treated with the same processes and security as we do personal information.

When an individual signs up to a mailing list they will receive a confirmation request email to confirm their subscription. Our mailing lists are never shared or sold with any third party and we make sure that everything we send is relevant to our work including our support offer to organisations.

If you no longer wish to receive a specific mailing all our mailings contain an unsubscribe option to enable people to stop receiving them at any time or alternative contact [comms@vsnw.org.uk](mailto:comms@vsnw.org.uk)

## **8. Texting & phone communications**

Where service users have provided VSNW with a phone number, we may use this information to contact them about the service which they have signed up to. For example, we may text them a reminder about an event which they have signed up for. This will only be done where they have explicitly consented to this, and they can opt-out of this communication at any time.

## **9. History Makers GM**

VSNW manages the History Makers sign up process on behalf of Manchester Health and Care Commissioning (MHCC). An individual may sign up to be a History Maker either via the dedicated website using an online form, or in person by completing a hard copy paper form. In both cases, the information provided will be stored in a contacts list stored in MailChimp.

Specific information collected may include: Name; email address; telephone number; area of Greater Manchester where they live or work; age; and employer.

This information will also be accessed by MHCC. Anonymised or aggregated versions of the data collected may be shared externally.

Any hard copy sign-up forms are securely disposed of once data has been transferred onto our database system. Electronic information will be kept for the lifetime of the project and in line with funders audit requirements.

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