

Our Privacy Policy

1. [About this Policy](#)
2. [Why we collect your data](#)
3. [Information we collect](#)
4. [Using your personal data](#)
5. [Social Media/Digital](#)
6. [Applying for a CLI Job](#)
7. [Professional Contacts](#)
8. [Our legal basis for processing personal data](#)
9. [Disclosure of your personal data](#)
10. [Security of your personal data](#)
11. [Use of data processors](#)
12. [Retention of your data](#)
13. [Your Rights](#)
14. [Complaints](#)
15. [Contact us](#)

1) About this Policy

Community Led Initiatives was launched by ex-offenders in 2013 with the mission to transform the lives of other ex-offenders through the power of quality peer mentoring. Now, we support a wide range of people – from families and women to people affected by substance misuse- by building supportive, peer-led recovery communities.

Our passionate team is dedicated to working alongside our diverse group of clients, their families and other agencies to help to create lasting changes and build stronger communities.

When doing this, we process personal data about people who receive advice, guidance or support services from us – or provide us with support through training courses, or volunteering. We are committed to protecting your privacy and take this responsibility very seriously. We therefore take care to safeguard it. This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

References to 'we' or 'us' are to Community Led Initiatives CIC, registered community interest company no: **08426120**

We regularly check this notice to ensure we provide you with the most up-to-date information regarding our data processing activities. We strongly advise you to read this page from time to time to ensure you are happy with any changes that might be made.

This privacy policy was prepared to be as comprehensive as possible, but it does not include an exhaustive list of every aspect of our collection and use of personal information. However, we would be happy to provide any further information or explanation about our practices.

If you have any questions about this policy, please contact us using the details in the 'Contact us, section below.

This privacy policy was last updated in May 2018.

2) Why we collect your data

We collect personal data for many reasons, including to provide you with services, communicate with you and send you information you have requested. Depending on how you interact with us, we may process data for the following reasons:

1. to provide you with advice or support services that you have requested or been referred to
2. to record personal details shared during conversations with support staff or volunteers
3. to process personal details required for the administration of your training course
4. to administer services CLI is providing to you
5. for our own internal administrative purposes, and to keep a record of your relationship with us
6. to manage your communication preferences
7. to process job applications or volunteer placements
8. to conduct surveys, research and gather feedback
9. to obtain information to improve CLI's services and user experiences
10. to carry out research to find out more information about our service users backgrounds and interests
11. to comply with applicable laws and regulations, and requests from statutory agencies

3) Information we collect

We collect the following personal information:

1. your full name
2. contact details – including your postal address, telephone number(s), and email address
3. date of birth
4. details of your case when providing you with advice or services
5. your bank details if employed or volunteering with us so we can reimburse expenses
6. records of your correspondence and engagement with us
7. information you may enter on the CLI website
8. photographs, video or audio recordings
9. occupation
10. biographical information
11. other information you share with us

This information may be collected via:

1. any paper forms you complete
2. telephone conversations or face-to-face interactions
3. digital forms completed via our website
4. publicly available sources
5. communication via social media

We sometimes also collect sensitive, personal data about individuals. This includes information about religion, sexuality, ethnicity, political and philosophical beliefs. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law.

4) Using your personal data

If you are receiving advice, guidance or support from us, we will need to process your data because of your specific relationship with us.

We will keep all your case information – including notes, letters and information given to us about you – in a confidential record that is specific to you. We use a customer relationship management system (CRM) to support our advice, guidance and support. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your case(s). This ensures that we provide appropriate and accurate advice or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or one of the other purpose discussed in this notice.

To ensure that our services meet a high standard of quality, client files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors if the work we

do is funded by another organisation, such as a local authority or the National Probation Service. All auditors are bound by confidentiality policies.

We may use your data for statistical reports. These statistics will not include any information that could be used to identify any individual.

5) Social media/digital

Depending on your settings or the privacy policies for social media messaging services like Facebook and Twitter, you may receive targeted advertisements through our use of social media audience tools. For example, Facebook's 'Custom' and 'Lookalike' Audiences' programmes enable us to display adverts to our existing supporters when they visit Facebook, or other people who have similar interests or characteristics to our supporters. We may provide your data (including your email address) to Facebook, so it can determine whether you are a registered account holder with them, or so that Facebook create a 'lookalike' audience. Our adverts may then appear when you access Facebook. We only work with social media networks that provide a facility for secure and encrypted upload of data, and immediately delete any records not matching with their own user base. For more information, or to manage your social media ad preferences, please see Facebook's ['About Custom Audiences'](#) guide and its [Data Policy](#).

6) Applying for a CLI job

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process through the statistics collected. Where we need to share your data – such as for gathering references, obtaining a Disclosure and Barring Services/Disclosure check (depends on the role), or a prison clearance (depends on the role) – you will be informed beforehand, unless the disclosure is required by law. These checks are only done after a position has been offered only to the successful candidate. On the application form, you are asked to complete the referee details, and can tick permission to contact referee. If tick yes, once offered a role, we will automatically send out reference requests. If you tick no, we will contact successful candidates for permission first.

Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it. If we feel there is another suitable vacancy available, we will contact the applicant prior to sharing your application details with the relevant manager.

Once you have taken up employment with CLI, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

7) Professional contacts

We may collect data about professional contacts and partners with whom we work, or to whom we provide professional services – such as training or publications. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

8) Our legal basis for processing personal data

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). One of these are relevant to the types of processing that we carry out. This includes information that is processed on the basis of:

1. CLI's legitimate interests (please see below for more information)

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Our legitimate interests include:

- Administration and operational management: including responding to solicited enquires, providing information and CLI's services, research, events management, the administration of volunteers and employment, and recruitment requirements

If you would like more information on our uses of legitimate interests, or to change our use of your personal data in this manner, please get in touch with us using the details in the 'Contact us' section below.

9) Disclosure of your personal data

We will not share any of your personal data to any third party – except where:

1. the transfer is to a secure data processor, which carries out data processing operations on our behalf (please see section 11 for more information)
2. we are required to do so by law, for example to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation
3. it is necessary to protect the vital interests of an individual
4. we have obtained your consent

We will **never** share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

10) Security of your personal data

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We encourage you to review the privacy statements of websites you choose to link to from the CLI website, so that you can understand how those sites collect, use and share your information. We are not responsible for the privacy statements, security, or other content on sites outside of the website.

11) Use of data processors

We may use a third-party supplier to manage the storage of your personal information on our behalf. You can find out more about the suppliers that we use by getting in touch with us using the details in the 'Contact us' section below.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from us, and in accordance with a data processing agreement entered into between CLI and the supplier.

12) Retention of your data

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and, on the law, or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc., or any contractual obligation we might have – such as with government contracts or if we have a business case, such as with research data. For business case data, we will anonymise the data, so no individual is identifiable.

Subject to the above, we will typically store data relating to people to whom we provide services to for seven years after completion of those services. Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted.

13) Your rights

You have many rights under data protection legislation. These include:

1. Right of Access

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 1 month. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by:

- emailing hello@communityled.org.uk
- writing to the Data Protection Manager, c/o Community Led Initiatives CIC, Unit 26 Mezzanine, Express Buildings 1, 1 George Leigh Street, Manchester, M4 5DL

2. Right to be informed

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

3. Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

4. Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

5. Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

6. Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials,

we will need to keep some limited information to ensure that you are not contacted in the future.

7. Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

8. Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

14) Complaints

If you have any complaints about the way in which we have used your data, please get in touch with us using the details in the 'Contact us' section below. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the [Information Commissioner's Office](#)

15) Contact Us

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in section 15 above, you can get in touch with us in the following ways:

- hello@communityled.org.uk
- 0161 222 3733
- Data Protection Manager, c/o Community Led Initiatives CIC, Unit 26 Mezzanine, Express Buildings 1, 1 George Leigh Street, Manchester, M4 5DL