



New Routes Integration

New Routes Integration Privacy Notice

Our contact details

Name: New Routes Integration

Address: Catherine Wheel Opening, Norwich, NR3 3BQ

Phone Number: 01603 662648

E-mail: info@newroutes.org.uk

Web: <https://newroutes.org.uk/>

The type of personal information we collect

We currently collect and process the following information:

Clients:

- Name
- DOB
- Address
- Contact details
- Country of origin
- Immigration status
- Outcomes monitoring
- Youth Consent and Emergency Contact
- Email and text message correspondence
- Meeting minutes

In some circumstances (notably participant registration – regarding ethnicity and health) New Routes collects data that is considered sensitive and is therefore categorised by GDPR as a ‘special category’

Volunteers:

- Name
- DOB
- Address
- Contact details
- Interview form
- DBS reference number
- Signed volunteer agreements
- Mentor partnership supervision notes
- Mentor diaries
- Training attendance registers
- Volunteer meeting attendance registers
- Email correspondence
- Meeting minutes

Supporters:

- Name
- Contact details
- Address (where supplied)
- Email correspondence

Online donors:

- Name
- Contact details



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- Address (where supplied)
- Email correspondence

Data collected pertaining to volunteers and participants will be stored securely electronically on our Lamplight database. Data collected pertaining to online donors will be collected and stored securely by Charities Aid Foundation (CAF) Donate, the third party we use to collect donations. The CAF Privacy Notice is available [here](#).

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Registering for our support services
- Registering as a volunteer
- Making a donation
- Registering as a supporter of the charity

We may also receive personal information indirectly, from the following sources in the following scenarios:

- Partner organisations in the Norwich Integration Partnership – English+; The Bridge Plus+. Referral information sharing about clients, in their best interest.
- The Red Cross Refugee Services, Norwich. Referral information about clients, in their best interest.
- Other charities/ statutory organisations via the secure NCAN (Norfolk Community Advice Network) referral system. Referral information about clients, in their best interest.

We use the information that you have given us in order to:

- Deliver and communicate about our charitable services
- Fundraise and market our charity, events and activities
- Manage volunteers
- To check your suitability for a role as an employee or a volunteer
- To make referrals to other third party charities or support organisations, where we believe this to be in a client's best interests



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We may share this information with

- English+
- The Bridge Plus+
- NCAN referral system
- NHS departments
- Bicycle Links CIC (Welcome Wheels Project)
- Norwich International Youth Project
- Norwich City Council
- Schools
- People From Abroad County Council team
- Job Centre
- Norfolk County Council
- Red Cross refugee service
- Age UK
- Terrence Higgins Trust

Lamplight database

New Routes is satisfied that our database providers, Lamplight, are GDPR compliant and that any data stored on Lamplight servers is only accessible to Lamplight staff members when a service is requested by New Routes, and that all Lamplight staff are bound by confidentiality agreements.

Any information shared with these organisations will always be in the best interests of the participant.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

Information is processed on the basis of a person's consent

Information is processed on the basis of the "legitimate Interests" of New Routes

In extreme situations, we may share personal details with the emergency services or local authorities if our employees believe it is in your 'vital interests' to do so. We may also share your personal information where we are compelled by law to do so.

New Routes is committed to safeguarding everyone we come into contact with, particularly children and vulnerable adults. If we identify that someone has been, or is at risk of, harm, we will share this information with other relevant agencies. We may sometimes need to do this without consent from the individual, in line with relevant safeguarding legislation.

Consent

New Routes will ask for consent to send marketing and fundraising emails, and text messages.

If you register as a participant or volunteer and you share information about health conditions: HEALTH is considered 'special category data'. Here we rely on legitimate interests and condition A of



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GDPR Article 9(2) - explicit consent for the processing of such data for a specified purpose. Providing NR with further information on health problems is optional. Health data will be used to guarantee that New Routes can provide the best service and support to individuals and to signpost individuals to other appropriate support. On occasion health data may be shared with other appropriate agencies, for example, health services such as the NHS, the Wellbeing service, solicitors or the Red Cross Refugee Service, Norwich. Explicit verbal consent will be sought before this data is shared.

Sometimes New Routes may collect client/participant data on ethnicity for monitoring/evaluation purposes. ETHNICITY is considered 'special category data'. Here we rely on legitimate interests and condition A of GDPR Article 9(2) - explicit consent for the processing of such data for a specified purpose. Data will not be linked to other identifiable personal data (eg. names/addresses).

You can withdraw consent for these channels and activities at any time by contacting New Routes' Data Controller, Gee Cook.

Legitimate Interests

The law allows personal data to be legally collected and used if it is necessary for a legitimate business interest of the organisation - as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned.

There are times when it is just not practical to ask a person for consent. In many situations, the best approach for New Routes and our supporters, clients, and volunteers is to process personal data because of our legitimate interests, rather than consent. If you want to change our use of your personal data for marketing and fundraising activities, you can do so at any time by contacting New Routes' Data Controller, Gee Cook.

New Routes Data Controller, Gee Cook, at geecook@newroutes.org.uk



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How we store your personal information

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- Induction on data security for all staff/volunteers working with data
- Security locks on external front door
- Using lockable cupboards and filing cabinets. Access to keys restricted to staff, sessional staff and trustees
- Password protection on all work computers, email accounts
- Password access to Lamplight database. Access to database restricted to staff members and sessional staff members with official New Routes email addresses
- Personal data can only be taken off site on password protected laptop
- All work mobile phones containing personal phone numbers will be password protected
- Data on computers will be backed up on to Microsoft OneDrive. Data on our Lamplight database is held in the Lamplight cloud server.
- Online donor data is collected and stored securely by Charities Aid Foundation (CAF) Donate, the third party we use to collect donations. The CAF Privacy Notice is available here: <https://www.cafonline.org/privacy#whatpersonaldata>
- Some basic data relating to the City of Sanctuary project (names and email addresses of event attendees) may be held securely on a password protected Google Drive account.

Party	Details	Retention period	Disposal
Staff & trustees (where applicable)	Personnel files	6 years after employment ceases, (slimmed down format after 2 years)	Hard copies: shredded Electronic copies: Deleted from servers
	Application forms and interview notes (unsuccessful candidates)	1 year	Hard copies: shredded Electronic copies: Deleted from servers
	Letters of reference	6 years from the end of employment	Hard copies: shredded Electronic copies: Deleted from servers
	Redundancy details	6 years from the date of redundancy	Hard copies: shredded Electronic copies: Deleted from servers
	Parental leave	5 years from birth/adoption or 18 if child receives a disability allowance	Hard copies: shredded Electronic copies: Deleted from servers
	Income tax, NI returns, income tax records and correspondence with IR	At least 5 years after the end of the financial year to which they relate	Hard copies: shredded Electronic copies:



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			Deleted from servers
	Statutory maternity pay records and calculations	At least 3 years after the end of the financial year to which they relate	Hard copies: shredded Electronic copies: Deleted from servers
	Statutory sick pay records and calculations	At least 3 years after the end of the financial year to which they relate	Hard copies: shredded Electronic copies: Deleted from servers
	Wages and salary records	6 years	Hard copies: shredded Electronic copies: Deleted from servers
	Employee joining/new starter form	6 years after employment ceases	Hard copies: shredded Electronic copies: Deleted from servers
	Assessments under health & safety regulations	Permanently	
Volunteers	Volunteer interview form & volunteer agreement	6 years after volunteering ceases/end of associated project, whichever is later	Hard copies: shredded Electronic copies: Deleted from servers
	Contact information	6 years after volunteering ceases/end of associated project, whichever is later	Hard copies: shredded Electronic copies: Deleted from servers
	Attendance and work records	Data relating to programmes will be retained for as long as is necessary to provide an audit trail for funders, as set out in contractual agreements. Usually 6 years after end of project/ end of service access, whichever is later	Hard copies: shredded Electronic copies: Deleted from servers
	Photographs	Indefinitely, unless consent is withdrawn	Hard copies: shredded Electronic copies: Deleted from servers
Participants/clients	Registration details	Data relating to programmes will be retained for as long as is necessary to	Hard copies: shredded Electronic copies:



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	Photographs	Indefinitely, unless consent is withdrawn	Hard copies: shredded Electronic copies: Deleted from servers
General	Accident books, accident records/reports	3 years	Hard copies: shredded Electronic copies: Deleted from servers
Supporters/ Online donors/ Event attendees	Attendance and work records	Data relating to programmes will be retained for as long as is necessary to provide an audit trail for funders, as set out in contractual agreements. Usually 6 years after end of project/ end of service access, whichever is later	Hard copies: shredded Electronic copies: Deleted from servers
	Photographs	Indefinitely, unless consent is withdrawn	Hard copies: shredded Electronic copies: Deleted from servers
	Donation data	6 years after the date of our last interaction. In most cases, this represents 6 years after the last financial transaction. There are a few exceptions to this rule. If a supporter	Hard copies: shredded Electronic copies: Deleted from servers



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		has kindly left New Routes a gift in their will we will maintain our records of that pledge indefinitely to carry out legacy administration and communicate effectively with the families of people leaving us a legacy. We also have a legal obligation to retain some financial information for seven years to allow HMRC to audit Giftaid.	
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Subject Access Requests

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Data Protection Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the DPA to access certain personal data being kept about them on computer and in certain files. Any person wishing to exercise this right should apply in writing to the New Routes Data Controller, Gee Cook, at geecook@newroutes.org.uk. The application will be approved by the Data Protection Lead.

The following information will be required before access is granted:

- Full name and contact details of the individual making the request
- Relationship to the organisation (former/ current member of staff, trustee, volunteer, participant, partnership colleague)
- Timescale the individual wishes to access

We may also require proof of identity before access is granted. One of the following forms of ID will be required: Passport, driving license, birth certificate, UK Gov. issued travel document, Home Office identity card

We will endeavour to deal with queries about handling personal information swiftly.

We will aim to comply with requests for access to personal information as soon as possible but will ensure it is provided within the 40 days required by the Act from receiving the written request.