



Privacy Policy – External

Introduction

At Clear Sky we take privacy very seriously. This is important to us given the highly sensitive nature of our work.

The information contained within this Privacy Policy cover what private information we might obtain and hold, and why.

This policy applies to subscriptions via our website, newsletter, and any interaction with our paid for services.

We encourage you to read this policy carefully and contact us with any questions using the contact details at the end of this document should you have any concerns about the use of your data.

Who we are?

The name of our Data Protection Officer is Sophia Giblin, CEO sophia@clear-sky.org.uk

Glossary of Terms Used

GDPR – General Data Protection Regulation

ICO – Information Commissioners Office

SMART database – Online System for Monitoring and Recording Data for Clear Sky client work

Parental Consent Forms – consent form for parents/carers to sign to give permission for Clear Sky involvement with their child.

Training participants – professionals from outside of Clear Sky who attend one of our training sessions.

Definitions

In line with the *General Data Protection Regulation 2018* principles, Clear Sky Children's Charity will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the *GDPR* principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

What information do we collect?

We may collect the following personal data through the course of our business eg when a user registers, purchases or uses your services, completes a contact form, signs up to a newsletter, interacts with us via Social Media, or applies to us for a job:

- Name
- Age
- Date of birth
- Gender
- Contact details
- Email address
- Telephone number
- Ethnicity and diversity information
- Employment history

How do we collect this data?

We may collect data via inviting contact through the 'Contact Us' page on our website, through Social Media and through sign up options within our mailing list preferences.

We also collect data from individuals who attend our training courses and events, both prior to the event through the booking website EventBrite, and as a result of collecting post course evaluations.

We collect information about children through schools using the following process:

- Schools to sign an agreement to confirm that parents agree to school passing on their details to Clear Sky
- School take responsibility for obtaining permissions with parents

How do we store this data?

The data we collect is always kept:

- In a locked filing cabinet
- In a portable, locked file box
- On password protected and encrypted hard drives and cloud -based systems

How do we use personal information?

The information we collect is used to provide:

- personalisation of content, business information or user experience
- account set up and administration
- delivering marketing and events communication
- carrying out polls and surveys
- internal research and development purposes
- Administration: We may use your personal information to record and deal with a complaint, record a request not to receive further marketing information, record what our therapeutic team have done for us, and for other necessary internal record keeping purposes.
- providing goods and services
- legal obligations (eg prevention of fraud)
- meeting internal audit requirements

Please note this list is not exhaustive.

What legal basis do we have for processing your personal data?

Clear Sky have legitimate vital interests in collecting data for the children for whom we provide therapeutic support. Our interest is in enabling us to provide bespoke services to support therapeutic interventions which are tailored to the needs of the child.

We also collect data based upon consent as detailed above for those whom we interact with via our paid for services and digital services.

Individuals are entitled to withdraw consent to their personal data at any time.

When do we share personal data?

We never sell or share data with third parties. We share data exclusively and only with the explicit consent of the school and in line with strict guidelines, if it is required for us to pass confidential information on to a governing body (e.g. PTUK) we only use encrypted methods (email) to transfer information securely.

Clear Sky ensure that appropriate Data Processing Agreements are in place for these organisations

Where do we store and process personal data?

It is our policy to keep documents in client files for 3 years and to keep other data for 6 months.

We do not transfer data outside the European Economic Area

How do we secure personal data?

Clear Sky adheres to professional standards and our staff are trained accordingly to treat information with confidentiality.

All personal data sent by email is shared via encrypted email, via secure email platform that Clear Sky use to ensure safe transit of data.

We conduct annual secure shredding of relevant files and destruction of data stored electronically.

Your rights in relation to personal data

Under the *GDPR* you have the right to access personal data that Clear Sky holds about you in writing

Information must be provided to you without delay and at the latest within one month of receipt.

If school/parent approaches us for data, this enquiry is dealt with by the Clear Sky Data Protection Officer.

We always identity check those requesting data.

How to contact us?

You can get in touch if you have questions or concerns about our privacy practices, your personal information, or if you wish to file a complaint:

In writing to:

Clear Sky Children's Charity

Manor House

Clear Sky Children's Charity

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Little Wittenham
Oxfordshire
OX14 4RA

By telephone at: 01865 362789

or by email at: info@clear-sky.org.uk

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