



MINISTRY OF STORIES

Privacy Policy

Updated July 2019

POLICY STATEMENT

The Ministry of Stories is a registered charity and we process, gather and store information to support the delivery of our creative writing programmes to young people, to recruit and manage staff and volunteers and to raise money and public awareness of our work.

We are committed to keeping your data safe. We're also committed to being up front and honest about what information we're collecting, why we do this, and how we use it.

We take the collection and storage of your information seriously, so this document tells you more about how and why we collect and store your information, and how you can control the information we hold.

The Ministry of Stories is considered a Data Controller and Data Processor, and therefore falls under the obligations of the General Data Protection Regulation (GDPR) and the Data Protection Act 1998.

Information we collect about young people under the age of 16

- We collect the name, address, phone numbers and emails of young people on our programmes and their primary carers and designated people who can collect young people.
- We collect attendance and evaluation data in order to track attendance and individual progress through our programme. We collect this information from primary carers directly, their school or referral partners, through our evaluation tool used during the programme and comments made by staff and volunteers.
- We may collect and record behaviour and health information about young people we work with in order to keep the young people we work with safe. We may collect this information from school or referral partners, primary carers and from volunteers and staff that work with young people directly.
- We may collect and process information about young people's ethnicity and eligibility for Pupil Premium Funding (Free School and referral partner meals). We also collect and process information about the additional learning needs, Special Educational Needs, English as an Additional Language or general behavioural needs, as well as collecting their gender and year group. We make use of the information in an aggregated, anonymised way; this anonymised data is then stored for future research, evaluation and reporting to funders. We collect this information from school or referral partners, and primary carers.
- We store information about the young people we work with in 'personal information records' on our database, Salesforce.
- Data that we hold about progress may be shared with the young person's school or referral partner, and primary carers, as well as using in an anonymised way to evaluate the effectiveness of our creative writing programme.
- We hold information about young people and their primary carers **for four years** after the date of their last engagement with us; after which we retain a skeleton record of the young person for research purposes and to enable us to track any young people that return to use Ministry of Stories programmes or to come back as volunteers.

- In line with best safeguarding practice, we may share information with primary carers, school or referral partners, and other statutory bodies.

Information we collect about staff, volunteers and learners over the age of 16

- your name, address and contact details, including email address and telephone number.
- details of your skills, experience and motivations for volunteering.
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.
- information about your criminal record.
- equal opportunities monitoring information, which may include information about your ethnic origin, sexual orientation, health, and religion or belief.

The organisation collects this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents.

The organisation will also collect personal data about you from third parties, such as references supplied by former employers, educational / training establishments, work experience providers or other appropriate referees as provided by yourself and information from criminal records checks.

Data will be stored in a range of different places, including on your application record, on our Salesforce database and on other IT systems (including email).

Why we collect and process this data

- The organisation needs to process data to administer your employment or volunteering application.
- The organisation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from employment or volunteer applications allows the organisation to manage the recruitment process, assess and confirm a potential volunteer's suitability for the role you have applied for.
- Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of volunteers and has concluded that they are not.
- Where the organisation processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.
- For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to that volunteering role.
- Following the conclusion of any recruitment exercise, the organisation will keep your personal data on file for **up to 6 months** to respond to any questions about the process. After which point, it will be deleted and hard copies shredded, if you did not proceed into work or volunteer with us.
- Your information will be shared internally for the purposes of the recruitment exercise. This includes with the Volunteer Coordinator, Writing Programme Leaders and with the Senior Management team if access to the data is necessary for the performance of their roles.
- The organisation will not share your data with third parties, unless your job or volunteer application is successful. The organisation will then share your data with relevant individuals and organisations (provided by yourself) to obtain references for you, and the Disclosure and Barring Service to obtain necessary criminal records checks.
- We collect, process and store Disclosure and Barring System information of all volunteers and staff, to ensure the safety of the young and vulnerable people we work with. Information about how DBS process your data and the options available to you when submitting an application can be found

at: <https://www.gov.uk/government/publications/standard-and-enhanced-dbs-check-privacy-policy/standard-and-enhanced-dbs-check-privacy-policy>

- By agreeing to this Ministry of Stories Privacy Policy, you are confirming you have read and understood the DBS Standard/Enhanced Check Privacy Policy (link above).
- Subject to the exception below your data will not be processed outside of the European Economic Area (EEA).
- Your data will only be processed outside of the European Economic Area (EEA) when we need to obtain reference information where the referee is not based within the EEA. This will require basic data transfer outside of the EEA. In this situation you will have provided the relevant contact details for the referee.
- For volunteers, we store information on the number of volunteering sessions completed, specialist skills and any safeguarding related information. This information allows us to assess volunteers against our minimum requirements, provide development opportunities where required and to protect volunteers and children and young people. This information is also used to ensure that we can provide accurate references when requested.
- We store information of active volunteers for **four years** after the last volunteering session.
- Volunteer sign up information is collected through our website (wordpress) and imported into our database, Salesforce. We collect additional information on paper during volunteer interviews conducted during our induction to gain additional information as to our volunteer skills, experience and interests. This information is added to Salesforce and the paper records are shredded.
- We collect this information from volunteers directly for those age 16+, and with parental consent from volunteers and/or work experience students under 16 years old.
- Information is stored on Salesforce, Mailchimp and acquired using googleforms and typeforms for surveys. We keep this data for **four years** following the last active engagement.

Information we collect about our funders, donors and supporters

- The personal information we collect might include name, date of birth, email address, postal address and telephone number. Data Protection law recognises that certain categories of personal information are more sensitive. These are known as special categories of data and cover data concerning health, race, religious beliefs and political opinions. We do not usually collect special categories of data about our supporters unless there is a clear reason for doing so such as participation in a run or walk or similar fundraising event or where we need to ensure we provide the appropriate facilities or support to enable you to participate in an event.
- Donors have the option to remain anonymous. For these donors we cannot process a Gift Aid claim.
- We collect information to track donations and how any donations have been used. We use that information to also tell people about opportunities to volunteer, to celebrate the work of the Ministry of Stories, to share our fundraising appeals and to invite people to events.
- We collect your information under the following legal bases
 - Consent – we will always ask for your consent to contact you for marketing and communications purposes.
 - Legitimate interest – charity governance including reporting and compliance, providing information about our services and research, and contacting you via post.
 - Legal obligation – we are required by law to retain information when a donation is submitted with a Gift Aid declaration, and where we record actions for a regulatory reason.

How we get your information

- You get in touch with us directly, for example to take part in a fundraising event, make a donation or communicate with us for another reason. This could also be through an organisation we work with who contacts you on our behalf.

- Your information is passed on to us, with your permission, by an independent fundraising organisation; for example, if you raise money by running in the Virgin Money London Marathon, or donate to us through the Just Giving website or using our online giving platform, Charity Checkout. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

How we use your data

- Complying with our legal obligations policies and procedures.
- Providing and personalising our services.
- Dealing with your enquiries and requests and responding to complaints.
- Fundraising, including personalising and sharing information about the work of our charity, making financial requests and promoting our fundraising events, products and services.
- For administrative purposes.
- Undertaking due diligence that protects the charity and/or supporter from risk or harm.

Updating your marketing preferences

You have a choice about whether you want to receive information about the Ministry of Stories' work and fundraising activities. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and we will never be in touch for marketing purposes via email or telephone unless you have given us your consent. You can change your marketing preferences (such as email or post at any time), by contacting hello@ministryofstories.org or calling 020 7729 4159.

- Only information that we actually need is collected and it is only seen by those who need it to do their jobs.
- We will only disclose data to third parties when obliged to disclose personal data by law, or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation, or we have your consent.
- We never sell or share your data to third parties.
- Personal information is retained only for as long as it is required for the purpose collected.
- Wherever we hold your information on the basis of your consent, we will look to reobtain your consent **every three years**.
- We will keep your information up to date and ask that you help us to do this.
- Your information will be protected from unauthorised or accidental disclosure.

Supporters are contacted through e-newsletters that are created and email lists maintained by Salesforce and Mailchimp. We store information in our database Salesforce for **up to four years** after your last donation or interaction with us (e.g. attending an event or sending us a letter). We can provide you with a copy of your personal information on request (please see below for Accountability and Record-Keeping).

Information we collect about customers of, and visitors to, Hoxton Street Monster Supplies, our trading subsidiary:

- We collect customers' and visitors' name, email addresses, addresses and phone numbers, which we gather directly from the individual, through our shop mailing list and online shop platform, Shopify and through our website operated by Wordpress.
- We collect information to track and fulfil shop purchase and to gain consent to contact people directly. We use that information to complete order, tell people about our products, share opportunities to volunteer and on occasion, to share successes of Hoxton Street Monster Supplies.
- We use the same database as the Ministry of Stories to store the opt-in data from our Hoxton Street Monster Supplies mailing list - with contact details obtained via the website or from the in-store mailing list.

- Supporters are contacted through e-newsletters that are created and email lists maintained by Salesforce and Mailchimp. We store information in our database Salesforce and Shopify **for up to four years** after a purchase.
- Where consent is given to receive the e-newsletter, we store information until consent is withdrawn via the 'unsubscribe' process.
- Information is stored on our Point of Sale system, Salesforce, and via occasional use of google forms and typeform for surveys. We keep this data **for four years** following the last active engagement.

Visiting our website

When you visit <http://www.ministryofstories.org> we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to track interest on specific pages, see how the site is being used and look at how we can make improvements to the site. The information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempts to find out the identities of those visiting the Ministry of Stories' website.

Cookies

We may use technology to track the patterns of behaviour of visitors to our site. This can include using a "cookie" which would be stored on your browser. You can usually modify your browser to prevent this happening. The information collected in this way can be used to identify you unless you modify your browser settings. We also track click-through links in emails sent as part of our e-newsletter service.

WordPress

The Ministry of Stories' website is built with WordPress and receives support from Fiasco Design who are contracted as a data processor for the Ministry of Stories. The site uses standard WordPress services to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site and how long they spend on a given page. We do this to monitor and report on the effectiveness of the site and help us improve it.

Further information about Fiasco Design's Privacy Policy [here](#).

Accountability and Record Keeping

Our Deputy Director is the lead for all work and enquiries in the area of data protection and privacy for Ministry of Stories. If you have any queries, you can contact them via email hello@ministryofstories.org or by telephone on 020 7729 4159, or in writing to Deputy Director, Ministry of Stories, 159 Hoxton Street, London N1 6PJ.

We will never sell or share your details.

Inaccurate or misleading data will be corrected as soon as possible and we ask that you help us to do this. These principles apply whether we hold your information on paper or in electronic form.

You can make a subject access requests ("SARs") at any time to find out more about the personal data which we hold for you. You can do this in writing, with a request sent to the Deputy Director, Ministry of Stories, 159 Hoxton Street, London N1 6PJ. Tel: 020 7729 4159 Email: hello@ministryofstories.org

Responses to SARs shall normally be made **within one month of receipt**, however this may be extended by **up to two months** if the SAR is complex and/or numerous requests are made. If such additional time is required, you shall be informed.

How you can request to be erased

We generally hold information **for four years** from your last engagement with us. Any information held beyond this time is held because of a legitimate interest for example, the need to hold Gift Aid information for seven years.

Data subjects have the right to request that Ministry of Stories erases the personal data it holds about them in the following circumstances:

1. It is no longer necessary for Ministry of Stories to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
2. The data subject wishes to withdraw their consent to Ministry of Stories holding and processing their personal data;
3. The data subject objects to Ministry of Stories holding and processing their personal data (and there is no overriding legitimate interest to allow Ministry of Stories to continue doing so)
4. The personal data has been processed unlawfully;
5. The personal data needs to be erased in order for Ministry of Stories to comply with a particular legal obligation.

You can request that your information is erased or corrected by emailing hello@ministryofstories.org or writing to Deputy Director, Ministry of Stories, 159 Hoxton Street, London N1 6PJ.

Unless Ministry of Stories has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, **within one month** of receipt of the data subject's request. The period can be extended by **up to two months** in the case of complex requests. If such additional time is required, the data subject shall be informed.

In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

For more information about how we manage and erase data, please request a copy of our **GDPR Policy** (Erasure of Personal Data section).

How to complain about the way we handle your information

If you would like to make a complaint about how we have handled your information you can make that directly to us by writing to Comments, Suggestions or Complaints, Ministry of Stories, 159 Hoxton Street, London N1 6PJ or emailing: hello@ministryofstories.org

You can also make a complaint directly to the Information Commissioner's Office <https://ico.org.uk/concerns/>

Updated policy approved by Board
Signed:
Role:
July 2019

Date of next review: July 2020