THE NETWORK

Data and Privacy Protection Policy

Last review: December 2025

Next review: December 2026

Data and Privacy Protection Policy

Introduction

This privacy notice explains the types of personal information we may collect about you when you interact with us. It also explains how we'll store and handle that information, and keep it safe.

We know there's a lot of detail here, but we want to make sure you are fully informed about your rights, and how The Network, Lincoln, uses your personal information (data) across all of our services.

We hope the following sections will answer any questions you have, but if not please do get in touch to let us know.

We will need to update this privacy notice from time to time. We will notify regular clients and partners of any significant changes, but you're welcome to check it whenever you wish.

Who we are

The Network is a Lincoln charity aimed at helping young people aged 16-29 achieve their potential and access the support they need. Advice, guidance and support is available to help with employment, training, volunteering, apprenticeships, and other issues that act as a barrier to achievement.

The Network works through one to one support and where needed, 'signposting' young people to relevant agencies and organisations. We also provide facilitated group sessions for 18-29 year olds. We work with over 60 partners in Lincoln, getting information and opportunities ready to help you decide what you would like to do. Once referred to a partner organization, or progressed onwards into a personal goal like employment, we then keep in touch to ensure you are getting on OK.

To find out more about us, you can go to our website: http://www.networklincoln.co.uk/

Or find us on Instagram go to: @networklincoln. For Facebook it's: @thenetworklincoln

To keep it simple, "we" and "us" mean The Network and its various projects/services.

Why we hold your data

The law on data protection sets out a number of different reasons for which an organisation may collect and process your personal data. These are called 'lawful bases'.

The lawful bases we rely on are:

Contract

In certain circumstances, we need your personal data to comply with contractual obligations.

For example if you are applying for a paid job or are a volunteer with us

Public task

In certain circumstances we need to process your personal data to perform a task carried out in the public interest, or on behalf of a public authority.

For example, gathering information required for monitoring by our funders, or gathering details of NEETs for Lincolnshire County Council as per a data sharing agreement

Legal obligation

Where the law requires us to, we need to collect and process your data.

For example, as an employer we have a legal obligation to disclose employee salary details to HMRC.

Legitimate interests

In certain situations, we need your data to deliver our services in a way which might reasonably be expected and which takes into consideration your rights and interests.

For this basis, we need to tell you about the purposes that are part of our 'legitimate interests'. These purposes include:

- Providing high quality information, advice, guidance and learning services
- Ensuring our services and support are tailored to your needs
- Sharing your data with third parties as appropriate (for example referring you to one of our partners or helping you to gain a work experience placement)
- Involving volunteers in our work
- Being accountable to third parties such as our funders, donors, supporters and regulatory bodies
- Fulfilling our charitable purposes and benefiting wider society
- Monitoring and evaluating the impact of what we do
- Marketing and public relations
- Managing risks and protecting the wellbeing and safety of everyone who comes into contact with us
- Complying with safeguarding standards
- Ensuring the efficient administration and operation of our services, including keeping information accurate and up to date

What type of data do we collect?

Personal data means any information relating to an identifiable person. The following table outlines the kind of personal data we may collect in the course of our services.

Items in bold are 'special category data' or criminal conviction data - we will need your explicit consent to collect and process this information unless another condition* for processing applies. In some cases this information may be required as

All enquirers, staff, volunteers, customers, partner organisations and other service users	Name and contact details (usually email address and telephone numbers, and a postal address where necessary along

	with the nature of the enquiry and any relevant information)
In addition to the above:	
Staff and volunteers working for us	Work history, skills and experience, **criminal record check – only for specific roles**, training records, availability, emergency contact details, relevant **health information, equality monitoring data such as ethnicity, gender, age**, performance and (for staff) payroll information.
Clients using The Network for information, advice, guidance and support in getting into work, training or education	Required: a form of contact, phone, email address etc., criminal convictions or pending court dates (for risk assessments and safeguarding if needed, as well as accurate IAG that complies with the law and Disclosure and Barring. This information will be kept confidential, and only be shared as needed or required by law) Emergency Contact details are also required- you may opt out of this but must be aware this means we have no one to contact on your behalf in case of an emergency. Optional: **equality monitoring data such as ethnicity, gender, age, home address.** (You may tick “prefer not to say”) Please be aware, we take home address details in case of needed safety checks in exceptional circumstance (e.g. a

	significant concern for your wellbeing/safety or health) You may choose to give us other information such as **health conditions, a copy of your CV, potential barriers etc.** the course of an appointment. We will only share this information with another organisation if you give your explicit consent or another condition* applies. We also request information on skills, interests and experience, work and education history We will keep appropriate notes on an encrypted system called Cliniko to allow us to track and deliver the best possible support, and also creating a level of accountability for staff. CVs and other information will be kept on secure computer systems
16-17 yr old NEETs (Not in Education, Employment or Training) or outside of mainstream education/employment etc.- Lincolnshire County Council NEET reporting	Required: active **opting in, name, date of birth, contact details, relevant information in terms of employment/education/training outcomes** This is an opt-in option which will be discussed in the meeting. It's part of our **"Information Sharing Agreement"** with Lincolnshire County Council to help monitor and track the progress of young people not in mainstream education whilst also providing relevant support if needed. You may access the agreement and relevant documents at any time to see how Lincolnshire County Council

	handles your data and to read their full purposes and legal bases.
People booking on to training/events	**Dietary needs, access needs/adaptations, emergency contact details (clients),** payment information where necessary and contact details where needed
Clients receiving continued support	Depending on the nature of the support, data may include: Your CV (new and/or old), records of work done with you, information on barriers or concerns, **support services used, welfare benefits, equality monitoring data, personal achievements / challenges, health, wellbeing and social care information, criminal record information, family and lifestyle information, carer / support worker contact details**, age, work experience, education, training and volunteering history. We will keep appropriate notes on an encrypted system called Cliniko to allow us to track and deliver the best possible support, and also creating a level of accountability for staff. We will also track soft and hard outcomes to anonymise for reporting. We will also take emergency contact details-you may opt out of this but must

	be aware this means we have no one to contact on your behalf in case of an emergency.
Partner organisations	Signed partnership agreement, organisation name, best points of contact, names of relevant staff members to be contacted in regards to client referrals, upcoming events and training. A chosen **Key point of contact** will have the choice to opt in to their work contact details being shared with other members of the partnership agreement in the interest of smooth collaborative working. This may be different to the **authorized signatory** of the agreement

*There are specific conditions for processing special category data and criminal offence data defined in UK law.

When do we collect your personal data?

- When you enquire about any of our services, for example by phone, email, in person, at an event, via social media/direct message or online registration. Online registration could be via an approved third party or other processor, such as Eventbrite. Phone calls may come through a work mobile or a VOIP app such as Horizon if distance working.
- When you visit The Network to find out more about our services and to access our information, advice and guidance in regards to work, education and training.
- When you apply to work for us, either paid or as a volunteer
- When you fill in forms (paper or online) to register for a service or event.

- When you use our information services, for example registering to receive our newsletters, attending a networking event or meeting with our project staff or volunteers.
- When you choose to tell us about personal information specific to you which helps us tailor our services to meet your needs.
- When you provide us with information that enables us to work with your organisation
- When you take part in research, evaluation or surveys in connection with our services.
- When you have been referred to us by another organisation, for example the Job Centre Plus, local organisations and charities, our partners, social service etc. In this case we will contact you directly as soon as possible and explain who we are and what we do. We will also explain how we will use your information if you choose to use our services.
- When we record and pass on your details (with permission) to Lincolnshire County Council's Post 16 team to assist with tracking young people not in mainstream education. This is both for data monitoring/statistics and to help provide the correct network of support to the young person if needed
- Our website uses cookies to track visitor progress through the site. This is to assist your navigation of our website whilst you are using it, and does not store any identifiable data about you personally.
- When distance working we may use video chat software to provide our service. This may again involve data being processed by a third party software and their separate GDPR procedures.
- During a safeguarding concern we may record and pass your details onto the local authority responsible for safeguarding or potentially emergency services in an emergency situation. In the most extreme cases, we may share home addresses for a safe and well check from the police

How your data is used/stored

Your data is used to provide you with services that you have requested. It helps us to respond to your queries and communicate with you more effectively.

It is sometimes necessary for your data to be shared with third parties as part of providing you with an efficient, high quality service, or for external monitoring of our services. Some examples of where your data will be shared with other organisations include:

- When we refer you to partner organisations to access the specific support that they provide, with your permission. It will then be stored according to their policies and procedures
- When you come to us to find out about local services, work experience, volunteering etc. we can pass your details directly to the organisations you are interested in if you would like us to.
- When you ask us to help you find community activities or support services and to pass your details on
- When you register for certain services, your data may be processed by an approved third party service or app, for example:

    - Registering for our events via a third party booking service (Eventbrite)
    - Signing up to receive one of our newsletters, which are created and distributed using Mailchimp.

- When we are required to share information with project funders, partners or evaluators to ensure we are properly monitored and our services are meeting expected standards. It will then be stored according to their policies and procedures
- When we share your information in regards to our Information Sharing Agreement with Lincolnshire County Council, it will then be stored according to their policies and procedures
- When distance working we may use video chat software to provide our service. This may again involve data being processed by a third party software and their separate GDPR procedures.
- During a safeguarding concern we may pass your details onto the local authority responsible for safeguarding or potentially emergency services in an emergency situation.

We take steps to ensure that any digital service providers we use are secure, GDPR compliant and operating in line with UK data protection laws.

We will never sell your data to anyone.

Your data will be stored on secure, password protected systems and may also be kept in paper or electronic filing systems.

Paper-based filing systems are kept in locked cabinets in secure buildings with restricted access. Electronic filing systems are kept on a secure, password-protected systems, and only accessible to authorised personnel in line with their duties and responsibilities.

Databases may be 'cloud-based' and managed by third party processors. We take steps to ensure that any providers of such services that we use are appropriately secure, encrypted and compliant with GDPR and UK data protection laws. Our current Client Records and Monitoring System is Cliniko (https://www.cliniko.com/policies/privacy/)

How long will we keep your personal data?

We will only keep your personal data for as long as necessary - the length of time will vary depending on the reason you gave us your data in the first place. Some examples are given in the table below.

We have archiving systems appropriate to each project or service to ensure any data kept is the minimum required to fulfil contractual, legal or safeguarding obligations. We have regular systems in place for deletion of electronic data and shredding of paper records.

Purpose	**Length of time kept**
Using The Network to enquire about our services	Personal data is kept for no more than 2 years after the last contact we had with if you have fully engaged with our services. After an initial enquiry, if no reasonable or relevant contact can be made with you we will delete it after 3 months. If you re-contact us, your data will be collected again at the time.
Newsletters/bulletin mailing list	For as long as you want to receive the bulletins. You can unsubscribe or change your details at any time by clicking on the link in each bulletin
Using The Network for our services in regards to information, advice, guidance and support	Personal data will be kept for the minimum length of time specified by our funding bodies, except: • Where there is no specified time period, personal data within our records will be kept for no more than 2 years after the last contact we had with you. • Where we are working with adults at risk or children/young people. Keeping detailed records is fundamental to good safeguarding practice, so in these cases, project data will

	be securely archived for the lifetime of project participants.
Staff and volunteer personnel records	We keep a list of names and dates of service as part of our organisational archive. All other data as part of personnel records will be deleted/shredded within 5 years of your leaving date, except: • Financial records are kept for 7 years References we provide for you are kept for 10 years from your leaving date.

Your rights

Right to be informed

This privacy notice informs you about how The Network will use, store and handle your personal information. We will review it regularly.

Please contact our office via the website, email, phone or in person to make a request in accordance with your rights as explained below. We may ask you to verify your identity, to ensure that no unauthorised person can access or alter your data.

Contact details for our office is on the website: http://www.networklincoln.co.uk/contact-us/

Or you can phone us directly at:

07458 016056

We will deal with all requests in line with guidance supplied by the Information Commissioner's Office (ICO).

Right of access

You can ask to see the personal data we hold about you.

Right to rectification

You have the right to have inaccurate personal data changed, or completed if it is incomplete.

Right to erasure

You have the right to have your personal data erased in certain circumstances. This right may not apply if there is a legitimate overriding reason why the data should be kept.

Right to restrict processing

You have the right to limit the way we use your personal data if you have a particular reason for wanting the restriction. This will usually be for a limited period of time whilst any issues are resolved.

Right to data portability

This right applies only to personal data provided in specific circumstances and relates mainly to automated processing where you have given your data to a company, for example as a customer of an online banking service.

Right to object

You have the right to object to

- Processing based on legitimate interests or the performance of a task in the public interest
- Direct marketing
- Processing for the purpose of scientific/historical research and statistics

You must have an objection on grounds relating to your particular situation, i.e. not just a general objection. We will stop processing your data unless there are compelling legitimate grounds which override individual rights/interests or if the processing is for the establishment, exercise or defence of legal claims.

Rights relating to automated decision making / profiling

At present, our data processing does not involve automated decision-making or automated profiling. We will update our privacy information and notify people affected if this changes.

Questions about this privacy information

If you have any questions about this privacy notice, please contact the Chief Executive in writing or by e-mail.

For more information about your rights, or if you believe that we are processing your personal data in any way that is inconsistent with the law or are not satisfied with responses to any query you raise with us, you may contact the Information Commissioner's Office (ICO) telephone helpline on 0303 123 1113 or via the ICO website at https://ico.org.uk/