**Privacy Notice**

**This privacy notice explains how and why Green Light process your personal information (data) when you make contact with us or use one of our services.**

Green Light is the data controller (organisation which determines the purposes and means of the processing of personal data) for the personal data we process, unless otherwise stated. We keep this Privacy Notice under regular review and any updates will be noted on our website. If we make any significant changes, we will make reasonable efforts to notify you. If you want to contact us in relation to this you can do so using the contact details at the bottom of this page.

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| **What is personal data?** |
| Personal data is any information relating to a living person who can be directly or indirectly identified by that data such as a name, email address, photograph, video etc.  The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the GDPR) and the Data Protection Act 2018 and other legislation relating to personal data and rights such as the Human Rights Act 1998. |

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| **What personal data do we use and why?** |
| We aim to provide information and guidance on all safeguarding children matters to everyone who wishes it. We need to process your personal data so we can make this as relevant and helpful as possible. We process personal data for communication and marketing purposes and in the delivery of all our services including to notify users about updates to our website. We may occasionally be legally required to disclose your personal data at the request of governmental authorities conducting an investigation, to verify or enforce compliance with the policies governing our website and applicable laws, or to protect against misuse or unauthorised use of our website.  We process personal data such as names, contact details e.g. email addresses, telephone numbers, addresses, and where this is relevant to the services we provide, or where you have provided them to us, demographic information such as gender, date of birth, nationality etc. Most of the data we process is provided by you for one of the following reasons:  * You have made an enquiry about one of our services * You have purchased and/or attended one of our training courses * You have made a complaint to us about one of our services * You have applied for a job with us * You have completed a survey which we use for research and evaluation purposes   Some of the personal data we process may include special category data. |

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| **Your rights and how to access your data** |
| **Right of Access -** You have the right to ask us for copies of your personal data.  There are some exemptions which means you may not always receive all the information we process – you can read more information on this [here](https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/what-to-expect-after-making-a-subject-access-request/#g). If we are unable to provide you with your personal data, we will always provide a reason for this. To submit a right of access request to us, email your request to [hello@wearegreenlight.co.uk](mailto:hello@wearegreenlight.co.uk).**Right to rectification -** You have the right to ask us to correct any information you think is incorrect.  You also have the right to ask us to complete information you think is incomplete – you can read more information on this [here](https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/).**Right to erasure -** You have the right to ask us to delete your personal information in certain circumstances – you can read more information on this [here](https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/).**Right to restriction of processing -** You have the right to ask us to restrict the processing of your information in certain circumstances e.g. if there is a dispute about the accuracy of your personal data – you can read more information [here](https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data/).**Right to object to processing -** You have the right to object to processing if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests – you can read more information on this [here](https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/). If you no longer wish to receive email communications from us, you can unsubscribe from these at any time by emailing [hello@wearegreenlight.co.uk](mailto:hello@wearegreenlight.co.uk). Alternatively, you can contact our office on +44 (0)7593 514 309. **Right to data portability -** This only applies to information you have given us.  You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you.  The right only applies if we are processing information based on your consent or under, or in talks about entering into, a contract and the processing is automated – you can read more information [here.](https://ico.org.uk/your-data-matters/your-right-to-data-portability/) If we are processing your information for criminal law enforcement purposes, your rights are slightly different.  Please see the separate [special category data policy.](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-law-enforcement-processing/?template=pdf&patch=6%23%3a%7e%3atext%3dPersonal+data+processed+for+any+of+the+law%2cprocessing+and+against+accidental+loss%2c+destruction+or+damage).&msclkid=91bc7787c66211eca3f5d754274ea870) **Right to complain -** You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. However, we would appreciate the opportunity to deal with your concerns before you approach the ICO, so please contact us in the first instance. You can contact the Information Commissioners Office on 0303 123 1113 or via [email](https://ico.org.uk/global/contact-us/email/) at the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK0 5AF. |

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| **What is the lawful basis for processing your data?** |
| In order to process your personal data, we are required to have a reason (lawful basis) for doing so. This may include:   * Consent, where you have agreed for us to use your data in a specific way for example to send you our monthly update email. * Contract, where you have an agreement with us for example deliver a training session. * Legal obligation, where we are required by law to share or process your data for example in relation to Safeguarding Disclosures. * Vital interests, where there is an immediate risk to your health for example at one of our events or courses. * Public task, where information is processed in relation to concerns raised in a training session. * Legitimate interests, where we aim to engage with and inform our members and supporters on topical safeguarding matters or to promote services which we believe you may have an interest in, to conduct research to better understand your needs and improve our services, handling any comments or complaints in line with our policy. |

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| **How long do we store your personal data?** |
| Personal data is processed in accordance with our retention policy and subject to statutory and legal responsibilities. We will only keep personal data as long as we need it. Further information is available on request using the contact details at the bottom of this page. |

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| **Sharing your data** |
| We will not rent or sell your personal data to any other organisation.  We may disclose your personal data to third parties if we’re legally obliged to or in order to enforce or apply our terms of use for this website or other agreements.  Where we use an external service provider to act on our behalf, we will disclose only the personal data necessary to deliver the service and will have a contract in place that requires the provider to comply with our data protection and information security requirements.  We do not carry out any automated decision-making or profiling.  Since leaving the EU, the UK has formally adopted GDPR and it is now known as the UK GDPR. |

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| **Special Category Data** |
| Some of the personal data we process may include special category data, which is personal data that needs more protection because it is sensitive.  This could include information about your health, race, ethnic origin, sexual orientation, sex life, politics and religion.  The categories of data we may process include health, race, ethnic origin, sexual orientation, sex life and religion. Our lawful basis for processing special category data, according to [Article 6](https://gdpr.eu/article-6-how-to-process-personal-data-legally/) of the GDPR, may be for one of the following reasons:  * **Consent** – where you have given us your consent to process this data when buying a service from Green Light or through employment with Green Light. * **Contract** – where we are undertaking consultancy work for your organisation and we need to process this data in order to fulfil our obligation under the contract. * **Processing is necessary for the purposes of the legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child** – where we use your personal data for statistical analysis to improve the services we provide, for example in our training offerings and to develop relevant training courses.  The conditions we use for processing special category data are as follows, as per [Article 9](https://gdpr.eu/article-9-processing-special-categories-of-personal-data-prohibited/) of the GDPR:  * **Consent** – where a safeguarding concern has been disclosed to a Green Light member of staff.   **Reasons of substantial public interest** (with a basis in law):   * **Preventing or detecting unlawful acts** – where a safeguarding concern has been disclosed to a Green Light member of staff. * **Protecting the public** – where a safeguarding concern has been disclosed to a Green Light member of staff. * **Regulatory requirements** – see point above on Statutory and government process * **Safeguarding of children and individuals at risk** – where we are protecting an individual from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual   Other data we process may be as a result of your visit to our website but does not include your email address (see the section on Use of Cookies). |

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| **Data collection when safeguarding concerns are shared with us** |
| When safeguarding concerns are shared or disclosed with Green Light member of staff all data is retained indefinitely and stored securely. With the exception of where we are legally required to do so for the purposes of a criminal investigation, we will only share information with third parties where there is an Information Sharing Agreement (ISA) or Service Agreement in place with the organisation to which the caller belongs, or where the caller has given their consent.  We cannot treat confidentially any information which suggests that an identifiable individual poses a risk of serious harm to another person, in particular a child, or in relation to a child or adult who is exposed to such risk. Where we have been given such details and the caller fails to take appropriate action, our duty will be to ensure that necessary steps are taken to protect a person from harm.  Whilst all our services are provided in good faith, we are unable to accept legal responsibility for that advice. |

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| **Use of Cookies** |
| A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.  Wearegreenlight.co.uk does not store any information or personal details. |

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| **New uses of our personal data** |
| From time to time, we may use collected information for new, unanticipated uses not previously disclosed in our privacy notice.  If our information practices change, we will post the updates to our website and provide you with the ability to opt out of these new uses.  We will only use data collected from the time of the policy changes for any new purposes.  Our website will always have the most up to date privacy notice on it if you have any concerns.  If you would prefer not to have your information used for these new purposes, please contact us using the details at the bottom of this page. |

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| **Keeping your information secure** |
| We take security very seriously and do all we can to protect your personal data.  We store all data securely, both physically and electronically, in accordance with our policies and comply with our obligations under GDPR and the DPA by minimising personal data, keeping it up to date, storing and destroying it securely and in a timely way, not collecting or retaining excessive amounts of personal data, protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical and organisational measures are in place to protect it. |

**Contact Details:**

* [hello@wearegreenlight.co.uk](mailto:hello@wearegreenlight.co.uk)
* +44 (0)7593 514 309