



Privacy Policy

Introduction

The Gap (Midlands) stores and processes data as part of the day to day operations of its charitable purposes. This policy outlines the following areas:

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Who we are

The Gap (Midlands) is registered with the Charity Commission for England and Wales (registration number 1127347). The organisation is managed by a board of trustees who share ultimate responsibility for governing the charity and directing how it operates and is run.

The Data Controller is the trustees of The Gap (Midlands).

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Principles

The Gap (Midlands) is committed to protecting your privacy and processing data lawfully. We therefore:

- Aim to be clear when we collect your information and not do anything you wouldn't reasonably expect.
- Always store data securely to prevent unlawful or unauthorised processing, access, loss, damage or destruction.
- Communicate with you according to your preferences and give you control over those preferences.
- Will not share personally identifiable information with any other organisation without your consent.
- Act in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.
- Will respond to and address any data related questions submitted in writing.

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The type of personal information we collect

We currently collect and process the following information:

Personal information is, in effect, any information that can be used to identify you. It can include, but is not limited to, any of the types of information listed below:

Name, address, email address, telephone number, contact preferences, social media identity.

Information about our services which you use, which we consider may be of interest to you; and/or any other personal information.

Bank account or credit/debit card details where required in relation to fundraising. employer details for processing a payroll gift and taxpayer status for claiming Gift Aid.

Medication information and emergency contacts.

Information about your computer/mobile device and visits to and use of our websites, including, for example, your IP address and geographical location and anonymised website interaction statistics.

National Insurance number, marital status, date of birth, age, and/or gender, personal descriptions and photographs, details of your qualifications, experience, immigration and/or emigration information.

We may also collect and process information about your interactions with us, including details about our contacts with you through email, SMS, post, on the phone or in person. This might include the date, time, and method of contact, details about donations you make to us, events or activities that you register for or attend or any request for support. We may also collect and record other relevant information you share with us about yourself

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How we get the personal information and why we have it

Personal information we process is provided to us directly by you for one of the following reasons: Attending The Venue and HeadSpace, for attendance, safeguarding, security, fire precautions and anonymised reporting on visitors and mentoring sessions.

We may also receive personal information indirectly, from the following sources in the following scenarios: Referrals from schools and other agencies to prepare for one to one mentoring sessions.

Your personal information may be shared with us by third parties with whom we work including, for example, fundraising platforms such as Just Giving; or organisations running events which help us raise funds such as the Sutton Fun Run. We will only receive your personal information from these third parties if you have consented to us doing so at the time of making your donation. We will always respect the communications preferences that you have specified.

Our website collects information when you submit a contact form or subscribe to a newsletter or send us a message via the website or by email. Like many websites our website uses cookies (small text files) to

monitor browsing preferences in order to make a user's experience more efficient and to provide us with the basic visitor statistics for analysis. This information is anonymous.

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How we use the information

Report on visitors, maintain safety, security and safeguarding protocols, monitor and report on one to one mentoring to ensure each child is safe and provided the right support and if necessary referred to other agencies.

We may share this information with:

Schools, social services or Police if it is thought there may be safeguarding concerns or under any other legal requirement to do so.

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

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting our main office in writing by email office@thegap-midlands.org or writing to us at our registered office above for the attention of the Data Protection Officer.

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task.

(f) We have a legitimate interest.

We collect and hold your information to enable our youth and mentoring activities to continue safely and to record information in case of a safeguarding issue.

The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant:

- Where you have provided your consent for us to use your personal information in a certain way (for example, we will ask for your consent to use your personal information to send you supporter newsletters and fundraising appeals by email, and we may sometimes ask for your explicit consent to collect special categories of your personal information).
- Where necessary so that we can comply with a legal obligation to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
- Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract (for example, if you apply to work for / volunteer with us).
- Where it is in your / someone else's vital interests (for example, in case of medical emergency suffered by somebody on our premises).
- Where there is a legitimate interest in us doing so.
- The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).
- In broad terms, our "legitimate interests" means the interests of running The Gp as a charitable entity and pursuing our aims and ideals; for example providing information about providing our services, processing donations, administering events and taking applications for volunteers.
- When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data

protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

We will not pass your personal information on to any third party other than for a safeguarding issue or under a legal requirement to do so.

We will sell your personal information to any other organisation.

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How we store your personal information

Information can be stored in paper form, which in turn is stored securely and not accessible to the public. We also store information digitally in secure locations and password protected.

We keep personal contact information for The Venue for at least two years, mentoring and safeguarding information for at least five years and financial information for at least seven years. We will dispose your information by secure means.

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Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request please contact us below:

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How to contact us

If you have any concerns about our use of your personal information, you can make a complaint to us at:

For the attention of:

The Data Protection Officer
The Gap (Midlands)
Banners Gate Community Church
Westwood Road
Sutton Coldfield
West Midlands
B73 6UG

Phone Number: 07599 912 670

E-mail: office@thegap-midlands.org

Website: www.thegap-midlands.org

You can also complain to the ICO if you are unhappy with how we have used your data:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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Signed:

Date: **1st July 2026**



Print name: **Philip Palser**

Position: **Trustee and Operations Manager**