

Privacy Policy

Our Commitment

A New Direction is committed to protecting and respecting the privacy of the people that we work and interact with, through the accurate, secure, and lawful processing of personal data.

This policy, together with any other documents referred to in it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read this policy carefully to understand our practices regarding your personal data and how we will treat it.

It is important to us that you feel safe and informed about how we use your personal data. If you need to contact us about anything to do with this Privacy Policy or your data, please email dataprotection@anewdirection.org.uk.

Policy Lead(s):	Director of Marketing and Development, Senior People and Operations Manager		
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Reviewed by:	Ayo Soley, Data Privacy Advisor, Moore ClearComm (Data Protection Officer) Hasina Allen, Senior People and Operations Manager (Internal Data Protection Lead)		
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I. Introduction

About A New Direction

A New Direction is a London-based charity, generating opportunities for children and young people to unlock their creativity. We are committed to protecting and respecting your privacy.

Our charity number is 1126316 and our company registration number is 06627531.

Our address is The Good Growth Hub, Unit 1 – 28 Echo Building, East Bay Lane, London, E15 2JS.

Our main website is <https://www.anewdirection.org.uk/> and is owned and operated by A New Direction. We also operate these websites:

- <https://community.createjobslondon.org/opportunities>
- <https://goodgrowthhub.org.uk/>

What information does A New Direction collect?

We collect information that you provide to us directly, to enable us to deliver our services.

We also collect information automatically when you visit our website. The information we collect may include your IP address, the pages you had previously visited or when you use our services, including usage, and cookies information or similar technologies.

We will only collect and process the minimum amount of personal data necessary for the specified purposes. Regular reviews will be conducted to ensure that we are not retaining unnecessary data. Data minimisation reduces the risk of breaches and aligns with UK GDPR principles by limiting the amount of personal data held.

2. Overview of personal data, processing, and your rights

What is personal data?

Personal data is information that relates to an identified or identifiable individual.

Under the UK General Data Protection Regulation ('UK GDPR') and [Data Protection Act 2018](#) ('the Act'), personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'), by reference to an identifier such as:

- a name,
- an identification number,
- location data,
- an online identifier

or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person'.

A New Direction is committed to transparency in how we process personal data. We will inform data subjects about how their data is used, who it is shared with, and the rights they have regarding their data.

The data controller

A data controller is the individual or legal person who controls and is responsible to keep and use personal data in paper or electronic files.

A New Direction is the data controller as defined by relevant data protection laws and regulation.

Lawful processing

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever personal data is to be processed:

- a) **Consent:** you have given your free, specific and informed or unambiguous consent for your personal data to be processed for a specific purpose.
 - A New Direction will always obtain explicit consent from data subjects before collecting any personal data, particularly for special category data. Consent will be documented and retained for verification purposes.
 - Explicit consent ensures that data subjects are fully informed and agree to the processing of their data, which is crucial for UK GDPR compliance, especially for sensitive data categories.
- b) **Contract performance:** the processing is necessary for the performance of a contract you have with A New Direction;
- c) **Compliance with legal obligation:** the processing is necessary for A New Direction to comply with tax or social security obligations, and employment law (not including contractual obligations);
- d) **Protection of vital interests:** the processing is vital to an individual's survival;
- e) **Public interest:** the processing is necessary for A New Direction to perform a task that is in the public interest or for its official functions, and the task or function has a clear basis in law; and
- f) **Legitimate interests:** the processing is necessary for A New Direction's legitimate interests, or the legitimate interests of a third-party, unless there is a good reason to protect the individual's personal data that overrides those legitimate interests.

Your data rights

Your data subject rights are:

- the right of access
- the right to rectification
- the right to erasure or right to be forgotten
- the right to restriction of processing
- the right to be informed
- the right to data portability
- the right to object
- the right not to be subject to a decision based solely on automated processing

A New Direction has established clear procedures for data subjects to exercise their rights under UK GDPR, including the right to access, rectify, and delete their personal data. All requests will be handled promptly and in accordance with UK GDPR timelines.

Clear procedures for handling data subject rights requests help maintain transparency and trust, as well as ensuring compliance with UK GDPR.

Under the UK GDPR and the Act, you may ask for a copy of the information we hold about you and you may request rectifications be made to this information if it is inaccurate or not up to date. Please contact us on dataprotection@anewdirection.org.uk.

3. What data does A New Direction hold?

Below we have outlined the type of data we hold depending on how you engage with us.

Business Contacts:

We hold data from our partners, such as organisations, trusts and foundations, schools and local authorities. This information is kept on Salesforce.

Why do we process your data?

Where personal data on business contacts is held, it is used for the following purposes:

- Promotion and development of our services;
- Communication with our business partners;
- Hosting and facilitating of events;
- Managing our relationships; and
- Administration and management.

What data do we hold?

Personal data that may be stored in Salesforce includes, but is not limited to: name, email addresses, phone numbers, your organisation's physical addresses and your job title.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Event Attendees

Why do we process data?

Where personal data about event attendees (people who sign up to attend an A New Direction event) is held, it is used for the following purposes:

- Communication with event attendees;
- Hosting and facilitating of events;
- Event administration, logistics and management.

What data do we hold?

Personal data is stored in Salesforce. Personal data that may be stored includes, but is not limited to, names, email addresses, phone numbers, your organisation's physical addresses, job titles. We also keep a record of participants' attendance at our programmes and events.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Programme Participants (18+):

Why do we process your data?

Where personal data on programme participants is held, it is used for the following purposes:

- Promotion and development of our services;
- Communication with our programme participants;
- Hosting and facilitating of events;
- Managing our relationships; and
- Administration and management.

We may also report aggregated anonymous data based on the engagement with our programmes to our funders.

What data do we hold?

Personal data is stored in Salesforce. Personal data that may be stored includes, but is not limited to: name, email address, phone number, your borough of residence. We also keep a record of participants' attendance at our programmes and events.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Programme Participants (under 18):

Why do we process your data?

Where personal data on programme participants under 18 is held, it is used for the following purposes:

- Communication with our programme participants;
- Hosting and facilitating of events;
- Safeguarding;
- Programme administration, logistics and management;
- To monitor your progress on our programmes;
- To measure and report on our impact.

We may also report aggregated anonymous data based on the engagement with our programmes to our funders.

What data do we hold?

Personal data is stored in Salesforce. Personal data that may be stored includes, but is not limited to: name, email address, phone number, your borough of residence, parents/legal guardians' contact details and their consent related to your

participation. We also keep a record of participants' attendance at our programmes and events.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Marketing communications, mailing lists and newsletters

Why do we process data?

We collect information necessary for the following purposes:

- To inform people who sign up to hear from us about our events, activities, and news.
- As part of the registration process for our monthly e-newsletters, which contain event listings, programme opportunities, news and featured blogs / research, we process personal information to facilitate our newsletter.
- To monitor the impact and reach of our communications.

What data do we hold?

All personal information is stored securely in Mailchimp and Salesforce (see 'How we keep your details safe and secure' below), and isn't shared with any third parties unless specified (see 'Third parties' below).

The necessary information to conduct the above activities, includes but is not limited to name, email address, phone number, your organisation's name and physical address and job title.

Engagement with our communications is tracked in Mailchimp, we can see who has opened our e-communications and links that have been clicked on. Only anonymised, total engagement figures are shared.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Employment and Skills Programme Participants

Why do we process data?

We collect information and process information about you in order to help build the next generation of creative workers.

What data do we hold?

As part of the sign-up process for our monthly newsletters, we collect the following information:

- Email address: this is compulsory as we need this to be able to send the newsletter to you
- First name and surname: this information isn't compulsory, but it does allow us to keep any information we have about you up to date.

All personal information is stored securely in Mailchimp, Salesforce and Submittable (see 'How we keep your details safe and secure' below), and isn't shared with any third parties unless specified (see 'Third parties' below)

We use a third-party provider, Mailchimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. Mailchimp are compliant with UK GDPR regulations, see their [privacy notice](#) for more information. You can unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of any of our emails or by emailing us at dataprotection@anewdirection.org.uk.

When you register to receive tailored job support, we collect more detailed information on things such as your employment status, date of birth right to work in the UK, ethnicity, age, qualifications and address. This is because many of our opportunities are only available to people meeting very specific criteria e.g. people living in certain boroughs who are unemployed, so we need this information to be able to send you relevant opportunities.

We also ask for details of your work interests, and any disabilities you may have. This is to help us provide you with the best tailored advice and pastoral support possible. We also ask for your email address and phone number so our staff can contact you with relevant opportunities and jobs.

We also use social media to broadcast messages and updates about events and news. On occasion we may reply to comments or questions you make to us on social media platforms. You may also see adverts from us on social media that are tailored to your interests.

Depending on your settings and the privacy policies used by social media and messaging services like Meta (WhatsApp, Facebook and Instagram), LinkedIn or X (formerly Twitter), we may receive non-personally identifying demographic or analytical information from these services that enables us to better understand the reach and effectiveness of our advertising.

4. Social Media

On our social media channels, we share news about our work, opportunities, events and people. We may reply to comments or questions you make to us on social media platforms. You may also see adverts from us on social media that are tailored to your interests.

Depending on your settings and the privacy policies used by social media and messaging services like Facebook, LinkedIn or Twitter, we may receive non-personally identifying demographic or analytical information from these services that enables us to better understand the reach and effectiveness of our advertising.

If you contact us, we may keep a record of that correspondence.

5. Sharing your personal data

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply any agreements, or to protect the rights, property, or safety of the organisation,

or other individuals. This includes exchanging information with other companies and organisations for the purposes of safeguarding or other statutory regulations we must comply with as well as those organisations with whom you and we have reciprocal agreements for providing services for education or professional development.

Before sharing personal data with third parties, A New Direction will ensure that appropriate data sharing agreements are in place to protect the data in accordance with UK GDPR requirements. Ensuring that third-party data sharing is controlled by agreements helps protect personal data and ensures that third parties are also UK GDPR-compliant.

6. Third party websites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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.

7. Protecting your personal data

The data that we collect from you will be processed at our servers within both the UK, EEA and USA.

If personal data is transferred outside the UK or EEA to a country without a designated adequacy rating, A New Direction will request the data subject's consent before processing the data. Consent will not be sought where the processor's Binding Corporate Rules, Standard Contractual Clauses or ad hoc contractual clauses stipulate that the data will be processed in accordance with the UK GDPR.

Personal data will not be transferred outside the UK or EEA without ensuring that adequate safeguards are in place, such as Standard Contractual Clauses (SCCs) or Binding Corporate Rules (BCRs). This ensures compliance with UK GDPR's requirements for international data transfers, protecting personal data from being compromised when transferred across borders.

Training

All staff members will undergo regular data protection training, with specific focus on UK GDPR compliance, data handling, and the recognition of potential data breaches. Data Protection training is a mandatory part of the induction process for new employees and refresher training takes place for all team members annually. Regular training ensures that all staff are up to date with the latest data protection practices, helping to prevent breaches and ensure compliance with UK GDPR.

Security of your personal data

To help protect the privacy of data and personally identifiable information you transmit through use of our website, we maintain physical, technical and

administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

In the event of a data breach, A New Direction will notify the Information Commissioner's Office (ICO) and affected individuals without undue delay and within 72 hours, in accordance with UK GDPR requirements. Prompt notification of data breaches is essential for mitigating risks and complying with UK GDPR's strict requirements on breach reporting.

How long we store your personal data for?

We store your personal data in accordance with our Data Retention Policy. This policy is reviewed and updated internally to ensure we do not store your data for longer than is necessary. We also review how and where we store any data to ensure that we meet our obligation to store data securely.

In addition, some of the data we hold may be subject to certain legal and regulatory obligations, which provide a minimum retention period for different types of data. The retention period varies depending on the data we hold.

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected. After that, it will be securely disposed of in accordance with our Data Retention Policy.

Clear retention and disposal policies help prevent the unnecessary storage of data, reducing the risk of breaches and ensuring compliance with UK GDPR's data minimisation principle.

8. Changes to this privacy policy

This privacy policy was last updated on 23 October 2024.

A New Direction reserves the right to vary this privacy policy from time to time. Such variations become effective on posting on this website. Your subsequent use of this website or submission of personal information to A New Direction will be deemed to signify your acceptance to the variations.

This privacy policy will be reviewed annually or whenever there is a significant change in data protection regulations or practices, ensuring that it remains up-to-date and effective.

Regular reviews of the privacy policy ensure that it remains relevant and compliant with any changes in data protection law or organisational practices.

9. More information about your data rights and complaints

For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

Contact details

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

Telephone: 0303 123 1113 (local rate)