

Urdd Gobaith Cymru



Privacy Policy

Version 3

Issued: June 2024

URDD PRIVACY NOTICE

OUR APPROACH TO PRIVACY

The Urdd is a registered charity and a company registered in England and Wales. We take privacy very seriously and we want you to feel confident that your personal information is safe in our hands.

Data protection law requires us ('us' the Urdd) to tell you how and why we use your personal data and our lawful basis for using your data.

In this document (our "privacy notice"), we explain how and why we use your personal information.

We also provide you with information about your rights and how you can contact us.

Any additional privacy information should be read in alongside this privacy notice.

1. TO WHOM DOES THIS PRIVACY NOTICE APPLY?

This privacy notice applies to anyone who:

- applies to become a member of the Urdd, whether online, over the phone or through the school or local branch, including e.g. the parent, teacher or contact of the prospective member.
- is a member of the Urdd and takes part in any Urdd activities.
- attends day / residential activities at any of the Urdd Centres.
- volunteers for the Urdd, including members of the Board of Trustees and other Urdd boards and committees.
- is an Urdd contact / branch leader.
- uses our website or apps.
- purchases goods from us, online or over the phone.
- supports the Urdd by sponsoring and contributing financially to the Urdd activities.
- contacts us with a query or to make a complaint (whether in person, by email, telephone or post).
- subscribes to our newsletters / updates.
- attends meetings online or public meetings.
- agrees to complete one of our surveys or questionnaires or provide us with feedback.
- registers and becomes a learner on the Urdd apprenticeship programme (see Appendix 1).
- is filmed on our CCTV systems.
- engages with us on social media.

- attends activities and events that are open to the public and / or to those who are not members of the Urdd.

2. A SUMMARY OF THE LAW

All UK businesses and organisations are covered by the data protection laws that regulate their use of information that identifies or enables the identification of individuals (“personal information”).

Below, we summarise the main UK GDPR principles, which state that personal data will:

- be processed lawfully and fairly in a transparent manner to relevant individuals.
- be collected for specific, explicit and legitimate purposes without being processed further in a manner that is incompatible with those purposes.
- be adequate, relevant and limited to the purpose for which it has been processed.
- be correct and up to date, and all inaccurate information will be deleted or corrected promptly.
- be kept in a form that allows the identification of data subjects for no longer than is necessary.
- use appropriate technical and organisational measures to protect the rights and freedoms of individuals.
- be processed safely and securely against accidental loss, destruction or damage, using appropriate organisational technical measures.

For further information about the lawful basis by which data is retained for the individual activities, please email data@urdd.org

3. SECURITY OF YOUR DATA

In accordance with the Data Protection Act, we maintain appropriate organisational and technical measures to enable us to protect your personal data including what is transmitted, stored or otherwise processed, from destruction, loss, alteration, unauthorised disclosure or unlawful access. These measures include computer protection measures and protected files and facilities.

When your personal information is transferred, stored and / or otherwise processed outside the EEA, we will ensure that appropriate measures are in place to protect your personal information (such as binding to standard contractual clauses).

4. YOUR RIGHTS

Under data protection legislation, you have the right:

- to access the personal we process about you.
- to ask us to correct inaccuracies in that data.

- to object to processing (in certain circumstances).
- to erase your data (in certain circumstances).
- to data portability in relation to automated profiling and decision-making to make a complaint to the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

See <https://ico.org.uk/for-the-public/>

The contact details for the Information Commissioner's Office are:

Customer Contact
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01625 545 745 or 0303 123 1113

Website: www.ico.org.uk

The ICO sets out your rights in relation to personal data. See <https://ico.org.uk/for-the-public/>

5. URDD DATA PRIVACY MANAGER CONTACT

We have appointed a data privacy manager to oversee our compliance with the data protection law and this privacy notice.

If you have any questions about this privacy notice, the lawful basis for data retention, or the way in which we handle your personal information, please contact our privacy manager. Here are the relevant contact details:

Data Privacy Manager - data@urdd.org

6. HOW WILL WE USE YOUR PERSONAL INFORMATION?

In this section, we provide further information on how we will use your personal information, what we will use it for and how we comply with the key obligations we have under the data protection act.

We have divided the personal information details into 3 categories:-

1. Core personal data upon joining and participating in the Urdd provision, namely attending residential centres, participating in Urdd events / activities and competitions, apprenticeship scheme, volunteering and supporting children and young people in the Urdd provision.
2. Sensitive personal data e.g. Health forms, identity documents e.g. Passport
3. Data relating to financial payments.

The definition of ‘Urdd provision’ in this document is: becoming a member of the Urdd, attending residential centres, participating in Urdd events / activities and competitions, undertaking a course or training, apprenticeship scheme, subscribing to services, volunteering and supporting children and young people in the Urdd provision.

Definition of Urdd staff – full and part time employed staff, contracted freelance staff and volunteers who support the Urdd’s provision and its clubs / departments / youth and community branches.

7. CORE PERSONAL DATA

When you are applying to become a member of the Urdd, and to take part in the Urdd provision, either yourself or on behalf of a child, you will have to provide the personal information in relation to the relevant individuals.

We will use the personal information you provide to us to fulfil our contract, (i.e. to register members and collect payments) to maintain the provision and for general administrative reasons.

We will also use the personal information (other than payment and gift aid information) if you take part in the provision organised by the Urdd.

Your Urdd membership personal information will be retained for the period of membership or until the date of your 26th birthday unless you have notified us otherwise.

It is necessary to retain your name, contact details and other general information for the period of membership in order to be able to:

- administer the membership and fulfil our contract.
- respond to the legal implications of statutory authorities.
- report to external funders.
- respond to requests from insurance companies.
- respond to issues relating to the protection of children and young people and vulnerable adults.

The core information NOT related to the membership of the Urdd will be retained for 36 months. This includes e.g. involvement with the Urdd by attending family holidays, enquiries, submitting a complaint, responding to research, ordering goods.

Personal information will be held for marketing or research purposes, provided you have consented, unless and until the consent is withdrawn.

If you choose not to provide us with the personal information, it may affect your ability to register to become a member and participate in the Urdd provision.

Registration data for the Apprenticeship Programme will be retained for a period of 5 years (see Appendix 1).

Data relating to Social Media

Any social media posts or comments you send to us (for example on the Urdd Facebook page) will be shared under the terms of the relevant social media platform (e.g. Facebook, Twitter, Instagram, TikTok), on which they are written and could be shared publicly. These platforms are controlled by others, not by us. We are not responsible for this type of sharing. Therefore, before you make any comments about anything, you should read the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you will be available in the public domain, and how you can prevent them from doing so if you are unhappy about it.

8. SENSITIVE PERSONAL DATA

Special category data is more sensitive and therefore requires greater protection.

- This includes e.g. medical information, identity details, passport details for overseas travel.
- The loss or subversion of this type of data could pose more significant risks to a person's general rights or freedom e.g. putting them at risk of discrimination.

To participate in the Urdd provision we may need to receive:-

- any relevant medical details falling within the special category personal information category;

We need the special category personal information in order for us to

- assess the participant's suitability to take part in the provision in question;
- amend the provision appropriately where required;
- accommodate/be aware of any allergies the participant may have;
- ensure the health and safety of all competitors/attendees;

We will only share special category personal information with any individuals involved in the provision of the tour/activity and medical professionals, first aiders and catering staff, as required for the above purposes.

We will retain the medical information (and date of birth for non-members) of the participant for up to 3 months after the activity / provision. In the event of an accident or incident, the personal information, including the medical / health information and any additional relevant information about the accident / incident, will be retained for 3 years after the participant reaches their 18th birthday for the purpose of RIDDOR reporting.

On some occasions, the information you provide in the health form will be used to update your personal profile.

If you do not provide any medical information, we will assume that you have nothing we need to be aware of.

9. DATA RELATING TO FINANCIAL PAYMENTS

For payment (if necessary) to participate in the Urdd provision, you will need to provide your bank or credit card details to enable payments, and if applicable, to administer Gift Aid:-

We need the following information in order to:-

- be able to take payment.

We will only use your bank or credit card details to process a payment.

There will be an option for you to securely store your bank or credit card details within your individual profile to enable payments to be processed as you make the most of the provision across the Urdd departments.

Your name and contact details and details of what you have bought will be kept for 12 months in your personal profile in case there is a dispute regarding the goods.

Automated decision-making

From time to time the information you present to the Urdd will be used in automated processes. Primarily from payment processing companies to analyse the possibility of fraud involving a payment.

10. USING OUR WEBSITE

Whenever you use our website, we routinely collect the following information from you to create a tailored website:

- Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locator ("URL"), clickstream to, through and from our website (including date and time), goods you viewed or searched for, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling clicks and mouse-overs), methods used to browse away from the page.

We will retain the information for a period of 26 months from your last visit.

Contacting us with a query or to make a complaint (whether in person, by email, telephone or post)

We will ask you to provide personal information if you are enquiring about our provision and the work of the Urdd and/or about making a complaint.

We need this information in order to deal with your query / complaint, to improve our provision, for internal development and training and to be able to defend any legal claims/disputes.

We will retain a record of your query / complaint until resolved and for a period of 12 months thereafter.

Complaints, concerns and allegations relating to the safety and protection of children, young people and vulnerable adults will be retained indefinitely.

Cookies: Our website and related services such as our store make use of cookies. More information, including a description of the cookies in use can be found in our cookie policy available here: <https://www.urdd.cymru/en/about-us/urdd-policies/cookie-policy>

11. PERSONAL DATA AND OUR CCTV SYSTEMS

Our CCTV systems will retain your image together with the time and location to:-

- prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime.
- ensure the personal safety of staff, visitors and other members of the public, and to prevent crime.
- assist in the maintenance of public order.
- support law enforcement bodies in the prevention, detection, investigation and prosecution of crime.
- provide assistance with civil claims.
- assist with day-to-day management, including ensuring the health and safety of staff and others.

Data recorded on the CCTV system will be recorded digitally and stored securely on hard drives. CCTV footage will be deleted after 30 days.

Where an incident has occurred, and / or where the police, prosecution agencies, legal representatives are involved and where images of specific people have been recorded and retained, the usual retention period will be overridden and the footage will be retained until the matter is resolved.

We will share the information at the request of:-

- the police.
- prosecution agencies.
- relevant legal representatives.
- people whose images have been recorded and retained.
- only when our Data Privacy Manager deems it appropriate to do so having considered all relevant circumstances.
- Wales Millennium Centre, which provides and monitors the CCTV system at our Cardiff site

12. DIRECT MARKETING - WHEN WILL WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

The term “direct marketing” essentially means directing any marketing material or advertising specifically to you. We would like to be able to send you direct marketing material from time to time to tell you about our latest offers and goods and services which may be of interest to you. However, in the UK, use of personal information by businesses and organisations for this purpose is subject to specific direct marketing rules as well as data protection law.

If you have given us consent to do so, we will use your personal information for direct marketing purposes:

Compulsory - when becoming a member, basic opt-in is compulsory, there is no opt out option.

Optional - Opt in, to an area of interest listed by the Urdd.

You can ask us to stop sending you direct marketing material at any time by visiting the website or contacting data@urdd.org

Also, every time we contact you electronically or by post, you can choose not to receive further direct marketing material.

13. SHARING YOUR PERSONAL INFORMATION WITH OTHERS

Sometimes, we will need to share your personal information with third parties in order to:-

- run our organisation efficiently, effectively and safely.
- ensure that we have an accurate list of members so that members have access to Urdd events and activities.
- disclose your personal information to organisations such as the courts or the police or to comply with legal obligations we are subject to and / or to prevent fraud or crime.
- check and confirm membership details, such as enabling access to the ‘Fund for All’ and membership discounts.
- comply with legal requirements.
- obtain professional advice and legal action.

We will not sell your personal information to third parties for marketing.

Who are our service and delivery partners

We have not listed the names of all our service partners in this privacy notice, as we will deal with different providers from time to time. However, if you would like further information about our current service providers, please contact the Data Privacy Manager - data@urdd.org

The main categories of service and delivery partners are

- Suppliers and sub-contractors that we use to deliver the Urdd provision;

- Marketing agencies that we use to create and/or provide advertisements and other publicity materials on our behalf;
- Organisations that we use to help improve our organisation and events, such as Arad Research;
- Providers of networks and/or cloud systems used to supply, maintain and/or improve our IT network from time to time;
- Analytics and search engine providers to help us improve our website and apps, such as Lime Green Tangerine;
- Urdd Funders, when you have participated in a publicly funded Urdd provision, e.g. the Welsh Government.

14. CIRCUMSTANCES IN WHICH WE WILL SEND YOUR PERSONAL INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA -

We envisage, on specific occasions, through our suppliers and partners operating outside the EEA, that we will need to send your personal data outside the EEA.

If we transfer your personal data outside the EEA, we will use one of these safeguards to make sure it is protected:

- We will only transfer to a non-EEA country which the European Commission has decided has an adequate level of protection for personal data. Further information about such countries is available here https://ec.europa.eu/info/law/law-topic/data-protection_en; or
- We will put a written contract in place between us and the recipient of the data (DPA – Data protection agreement and use of Standard contractual clauses), and the contract incorporates the European Commission’s clauses on the transfer of personal data outside the EEA. Further information is available about such clauses here [ICO/international transfers](#); or
- We will ask for your explicit consent.

15. YOUR RIGHT TO WITHDRAW YOUR CONSENT

When we use your personal information based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent, please contact data@urdd.org. Once we have been informed that you have withdrawn your consent, we will no longer process your information for the original reason or reasons, unless we are able to base our processing on another lawful basis.

16. CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time. If we make substantial updates, we will provide you with a new privacy notice. We may also keep you informed from time to time about how your personal information is processed.

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Signed



Sian Lewis
Chief Executive

Appendix 1 – For the attention of the Apprenticeships Department only.

The collection and storage of data – registering for an apprenticeship programme

Urdd Gobaith Cymru collects data in accordance with the [Lifelong Learning Wales Record Privacy Notice V70 2023 \[HTML\] | GOV.WALES](#) on all individuals registered as an apprentice with Urdd Gobaith Cymru, including any joint delivery work with other partners.

This information is stored by Urdd Gobaith Cymru for 5 years, in line with the guidelines of the awarding bodies we use.

The information collected will be shared with the Welsh Government. The Welsh Government will store this data for 10 years following the end of the relevant work-based learning contract. Information about the purpose of storing this information can be found in the privacy notice above.

It is the duty of Urdd Gobaith Cymru to ensure that all apprentices (or learners) receive a copy and have the opportunity to read the Lifelong Learning Wales Record Privacy Notice upon enrolment on the programme or qualification.

The personal data collected include:

- Unique learner identifier (created by Welsh Government)
- Learner ID (created by your learning provider)
- Surname
- First name(s)
- Address
- Post Code
- Phone number
- National Insurance number
- Gender
- Your surname at 16
- Date of birth
- National identity
- Last school you attended
- Year you left school
- Unique learner number (created by the Learning Records Service)
- Whether you're a migrant worker
- Learning difficulty or disability indicator
- Post code (at start of learning programme)

The Welsh Government also processes this special category learner data:

- Ethnicity
- Type of disability
- Health status

The provision of data for these three categories is optional.

Urdd Gobaith Cymru also shares limited information with the Awarding Bodies in order to register learners for qualifications.