

<b>Purpose of this Statement</b>	To detail the Privacy Policy at Bradford North Foodbank
<b>Dated</b>	May 2025
<b>Designated Contact</b>	Office Manager

This policy is just one in a suite of policies concerned with data protection. Other policies and procedures within the GDPR Suite:

- Data Protection Policy
- Confidentiality Policy
- Online Privacy Statement and Cookies Policy
- Records Management Policy
- Records Management Procedures

## Introduction

Bradford North Foodbank is a data controller registered with the UK Information Commissioner's Office registration number **ZA132799**.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.

We have policies, procedures and training in place to help our people understand their data protection responsibilities and follow the principles of data protection.

We have a nominated member of staff (our Office Manager) who is responsible for oversight of our Data Protection responsibilities. If you have any questions regarding our Privacy Policy, please email [info@bradfordnorth.foodbank.org.uk](mailto:info@bradfordnorth.foodbank.org.uk).

This privacy policy relates to personal information that Bradford North Foodbank collects and uses. We are an independent charity which is part of the Trussell Foodbank Network. We share personal information about food bank use with the Trussell which is a separate data controller. Trussell directly supports over 1,400 food bank centres throughout the UK which together represent the Foodbank Network. For more information about who we share your personal data with please visit the "Sharing personal information" section below.

## How we collect personal information

We may collect your personal information from you directly when you:

- communicate with us for any reason, by post, telephone, text, email or via our website
- make a donation
- visit a food bank or are referred to a foodbank for support

- participate in a survey or research
- work or volunteer, or make an application to work or volunteer for us.
- agree to help us promote our work
- interact with us as a supplier, contractor, consultant or in any other capacity.

We may also collect personal information about you from other organisations. For example, from a referral agency like a doctor's surgery, when you are referred to the foodbank.

## **The personal information that we collect**

We only collect personal information that we genuinely need.

This may include:

- For people referred to the foodbank:
  - data that you provided when referred for a foodbank voucher or vouchers, including your name, address and year of birth
  - information about your household including the number of other adults and children living with you
  - the reason you were referred and your explicit consent where appropriate
  - who gave you the foodbank voucher
  - with your consent, your phone number so that the foodbank can contact you about any support available
  - with your explicit consent, any dietary requirements
  - with your explicit consent, ethnicity information for equalities monitoring purposes
- Financial information that you provide to us, for example payment information when making a donation, including any Gift Aid declaration you make
- Contact information you provide when donating food, supporting one of our campaigns, or signing up to receive communications from us
- For job and volunteer applicants:
  - your bank account details, tax and residency status
  - references from previous employers or educational institutions
  - contact details for your family members and next of kin
  - qualifications
  - information concerning your health and medical conditions
  - information about your race, ethnicity and sexual orientation
  - details of unspent criminal convictions.

## **Our lawful basis for processing personal information**

Our lawful basis for processing personal information is one of:

- Legitimate interest – the processing is necessary for our legitimate interests or those of a third party
- Consent – you give clear consent for us to process your personal data for a specific purpose
- Contract – the processing of a contract we have with you to provide
- Legal obligation – the processing is necessary for us to comply with the law in some other manner.

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

We will ask you for consent before opting in to receiving marketing emails and text messages from us. You can unsubscribe from these at any time.

Usually, we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe someone's life is at risk.

We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract), or because we are legally obliged to do so, for example to meet employment or charity laws.

## **Why we collect personal information**

We collect and use personal information about people who use food banks, supporters, job applicants and volunteers for a number of reasons.

### Assisting people that use foodbanks

We collect personal information from you directly from you when you visit the food bank, or via an organisation that refers you to a food bank for support. Our lawful basis for using this information is legitimate interest as we wish to respond to your need for help, and ensure that we are providing help when and where it is most needed.

In some situations, we may ask you for sensitive (special category) information, for example about your health or your ethnicity. We use this information to ensure we're providing you with appropriate support and to help us to better understand if we're meeting the needs of different groups in our communities. This is sensitive personal information, and we need your explicit consent to hold it. You can choose not to provide this information and it won't affect the help you receive in any way. If you provide ethnicity information, it cannot be seen by others and once you collect your parcel this information is anonymised (so that it can't be linked to you).

We share information about people who use food banks with Trussell, which works with us and other food banks across the UK. Trussell uses anonymised statistical data to campaign at a national level to challenge the structural issues that lock people into poverty.

### Developing relationships with supporters

Our work is made possible because of the generosity of our supporters. We need a good understanding of our supporters so that we can communicate with them effectively and appropriately. We will only send you marketing communications via email or text where you have opted in to receiving them. You can unsubscribe from receiving these communications at any time by contacting [info@bradfordnorth.foodbank.org.uk](mailto:info@bradfordnorth.foodbank.org.uk).

We may research our existing and prospective supporters to develop a better understanding of their interests and actions in support of our work. We use publicly available data sources (such as the Electoral Register, Companies House, public social media accounts such as LinkedIn, company websites, political and property registers, and news archives to supplement the personal data we already have. We may also use the research to profile our financial supporters in order to make appropriate requests to people who have the means and the desire to give more.

### Processing donations

If you kindly make a donation to us (of food or money), we will use your personal information to collect your donation and maintain a record of our supporters. Our lawful basis for using your personal information for this purpose is to meet our legal obligations, and to fulfil our legitimate interest and fundraising objective. We are legally required by HMRC to collect some personal information, for example where you choose to add Gift Aid to your financial donation.

## Dealing with complaints and appeals

If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal in line with our Feedback and Complaints Policy. This may include sharing relevant information with Trussell or the person that the complaint has been made about. Our lawful basis for using personal information for this purpose is legitimate interest.

If you make a complaint about an individual and this forms part of their personal data and the individual requests access to it, we will seek to remove personal information identifying you first. In some situations, we may be obliged to provide your personal data. Where appropriate we will seek your consent before providing the information but may be required to provide this even if you do not consent.

## Promoting our work

We work alongside people who have lived experience of poverty to raise the profile of our cause. We will use personal information that you share with us if you agree to help us promote our cause. This might include photographs and videos. For example, we may ask to use your information in case studies or stories that we will publish or share with Trussell and the media. We will seek to anonymise your information wherever possible and will only use your information for this purpose if you have given your consent for us to do so.

## Carrying out surveys and research

If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We may use a university, work with Trussell or third-party research organisations to undertake analysis of survey responses. Survey results are anonymised before being shared or published. Our lawful basis for using your personal information for this purpose is for our legitimate interests, or where appropriate your consent.

## Health, safety and security

We will process limited personal data about attendees to our operating premises whether those attendees are employees, contractors, volunteers, or members of the public. We do this to ensure the health and safety of people inside the building as well as the security of the building and its contents. Our lawful basis for this processing is our legitimate interest.

## Employee and volunteer administration and development

We will process personal information of employees to fulfil our contract with them, and to meet our legal obligations as an employer. This includes payroll processing and the provision of training. We are required by law to share some financial information with the HMRC. We may also need to share some personal information with other organisations, for example solicitors, pension providers.

Where you volunteer with us, we collect personal information to support the administration of your volunteering activity. Our lawful basis for processing volunteers' personal information is our legitimate interest, to meet our legal obligations, or where appropriate, your consent.

We share personal information about our employees and volunteers with Trussell to support the work of the Foodbank Network. Trussell uses this information to communicate with our workforce and provide access to support services available. Trussell uses data about volunteers to produce statistical and aggregate information about volunteering across the Foodbank Network to help develop and improve people's experiences of volunteering, for equalities monitoring purposes, and to evidence the impact of volunteering across the Foodbank Network.

## Recruitment

If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your application. We may also collect personal data about you from third parties, such as recruitment services, references supplied by former employers, information from employment background check providers and information from criminal records checks when applicable to the role.

Where applicable, we need to process your data prior to entering into a contract with you, to meet our legal obligations, or because we have a legitimate interest to use the personal information provided for our recruitment purposes. We will not use this information for any other purpose.

## Undertaking safeguarding activities including DBS checks

When necessary, we process relevant personal information about employees and volunteers for safeguarding purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of. It may be necessary to share some personal information with relevant authorities such as the police. Our lawful basis for this processing is to meet our legal obligations or where appropriate your consent.

## Processing expenses

We will use your personal information including your bank account details to process expense claims. Our lawful basis for using your information for this is for the performance of a contract.

## Governance

We process relevant personal information about existing and potential trustee members for governance purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees, and registration with regulators and other bodies. Our lawful basis for this processing is to meet our legal obligations with the Charity Commission, Companies House and HMRC.

## Cookies, web beacons and other storage technologies used on our website

We use cookies and other tracking technologies to store information about how you use our sites. A cookie is a piece of data stored on a user's computer to remember information about you and create a profile of your viewing preferences. Your profile is used to tailor your visit to our website, make navigation easier, and direct you to information that best corresponds to your interests.

We require your consent to place non-essential cookies on your device. You can change your cookie preferences by selecting the button in the bottom left corner from any page on our website. You can view our cookies policy at <https://bradfordnorth.foodbank.org.uk/cookie-policy>.

## **Sharing personal information**

We will only share your personal information where we need to, where someone's life is at risk or where we are required to do so by law.

We may share your personal information with Trussell which is a separate data controller. Trussell directly supports over 1,400 food bank centres throughout the UK which together represent the Foodbank Network. Where we share your personal information with Trussell we will inform you as outlined in the section "Why we collect personal information" above. We have a data sharing agreement in place with Trussell which sets

out what information is shared, why and how we share the data. You can view Trussell's privacy notice at <https://trussell.org.uk/privacy>.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our IT hosting or support service providers. We have data processing agreements or clauses in place with any data processors that we may use, ensuring they will not use your information for their own purposes and that they protect your personal information to the same standards as set out in our policies.

We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.

Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

In some situations, the organisations may transfer some or all of its assets as part of a merger or acquisition. If another organisation acquires the food bank, they will hold substantially all the same information and will assume the rights and obligations with respect to the personal information as described in this Privacy Policy.

## **International transfers of data**

We may need to transfer some personal data to the third parties described above who are located outside of the UK. In such cases, we will take appropriate measures to ensure your personal data remains protected. If the receiving organisation is based outside of the UK and in a country that is not protected by an adequacy decision (providing an adequate level of data protection) we will take appropriate safeguards, such as implementing International Data Transfer Agreements as part of our contracts with our processors.

If you have any questions or need more information regarding international transfers of your personal data, please contact us at [info@bradfordnorth.foodbank.org.uk](mailto:info@bradfordnorth.foodbank.org.uk).

## **Your rights**

If you no longer wish to receive communications about products and services from us, please contact [info@bradfordnorth.foodbank.org.uk](mailto:info@bradfordnorth.foodbank.org.uk)

You can also unsubscribe at any time to emails that we may send to you about the products and services that we think will be of interest to you. A link to unsubscribe from all direct marketing will be included in any communications.

You also have the right to:

- ask us for copies of your personal information
- tell us to change or correct your personal information if it is incomplete or inaccurate
- ask us to restrict our processing of your personal data, or to delete your personal data if there is no compelling reason for us to continue using or holding this information
- receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation
- object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you.

For all requests, please contact us at [info@bradfordnorth.foodbank.org.uk](mailto:info@bradfordnorth.foodbank.org.uk). We will respond to any request within 30 days.

Please note that we may be entitled to refuse requests where exceptions apply, for example if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

## How long we keep your personal information

We will hold your personal information only for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes. We have in place a personal data retention schedule which sets out how long we keep your personal information for.

A summary of our retention periods is available in appendix 1.

## Changes to this policy

This Privacy Policy may change from time to time. We recommend that you visit <https://bradfordnorth.foodbank.org.uk/privacy-cookies-policy/> periodically to keep up to date with any changes in our Privacy Policy.

## Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Data Protection Lead	Ben Clymo
Monitoring of the procedures	Office Manager
Reporting To	Trustees
Next Review Date	March 2027

This policy was approved by the board:

<b>Name:</b> Ben Clymo	<b>Signed:</b> <i>Ben Clymo</i>
<b>Position:</b> Chair of Trustees	<b>Date:</b> 31 <sup>st</sup> March 2026

## APPENDIX 1: Retention periods

<b>People who need help from the food bank</b>	Your personal information is stored in a secure database for seven years from the date you last received support.
<b>People who donate food</b>	Where you provide personal information alongside your food donation, your personal information is stored in a secure database for three years from the date you last donated.
<b>People signing up to a campaign</b>	Your personal information is stored in Microsoft SharePoint for up to 2 years from the date you last took an action.
<b>Financial donors</b>	Your personal information is stored in a secure database for seven years from the date you last donated.
<b>Volunteers (inc. people engaged in our participation projects)</b>	If your application is unsuccessful, or if you stop volunteering, your information will be held for twelve months unless we're obliged to keep it longer. In which case, we only keep necessary information.
<b>Survey and research participants</b>	Twelve months after survey is completed. Then results are anonymised.
<b>Promoting our work through sharing your story, photographic images and videos</b>	Up to two years after consent was obtained, unless you withdraw your consent sooner.
<b>Representatives of referral agency partners</b>	Two years after the date of the last referral made.
<b>Complainants</b>	Six years if the complaint is upheld, three years if the complaint is not upheld.
<b>Employees</b>	Seven years after employment ceases.
<b>Website users</b>	See our cookie policy <a href="https://bradfordnorth.foodbank.org.uk/cookie-policy">https://bradfordnorth.foodbank.org.uk/cookie-policy</a>