

Trust Links Privacy Notice

How we collect use share and protect personal information

Organisation	Trust Links Ltd
Document owner	Data Protection Compliance Officer
Status	Approved
Effective and review dates	October 2025: Review at least annually and when processing changes

Privacy at Trust Links

This notice explains how Trust Links handles personal information across our mental health, wellbeing, environmental, children and family, education, volunteering, fundraising and digital services. It applies whether you contact us directly, are referred to us, visit one of our sites, use our website or app, work or volunteer with us, donate, or engage with us in another capacity.

Our commitment. We use personal information lawfully, fairly and transparently. We collect only what we need, keep it accurate, protect it from inappropriate access and retain it only for as long as necessary. We do not sell personal information.

1 Who we are

Trust Links Ltd is a registered charity and company in England and Wales. For most activities described in this notice, Trust Links decides why and how personal information is used and is therefore the data controller. For some commissioned or partnership services, another organisation may be the controller or we may share responsibility. We will explain this where it applies.

Registered charity	1092324
Registered company	4351216
Head office	47 Fairfax Drive, Westcliff-on-Sea, Essex, SS0 9AG
Data protection contact	Matthew King, CEO and Data Protection Compliance Officer [Insert monitored email address]

2 Who this notice covers

This notice covers personal information relating to:

- people who use, are referred to, enquire about or previously used our services, including members, students and app users
- children and young people, and their parents, carers and family members
- referrers, health and care professionals, partner organisations and emergency contacts
- employees, workers, job applicants, volunteers, trustees and former colleagues

- donors, supporters, fundraisers, event attendees and people who receive our communications
- suppliers, contractors, tenants, visitors and website users

3 Information we may collect

The information we collect depends on your relationship with us and the support or activity involved. It may include:

- identity and contact details, including names, addresses, email addresses, telephone numbers, dates of birth and identifiers
- demographic and equality information, such as age, disability, ethnicity, religion, sex and sexual orientation
- health, disability, wellbeing, medication, accessibility and support information
- referral information, assessments, case notes, attendance, plans, outcomes, communications and feedback
- safeguarding, risk, incident, accident and emergency-contact information
- family, caring and professional relationships where relevant to support
- employment, recruitment, volunteering, training, supervision, payroll and right-to-work information
- donation, Gift Aid, fundraising, payment and financial records
- images, audio or video where appropriately notified, including CCTV where used
- website, app and technical information such as IP address, device, browser, cookies, log-in and usage data

Sensitive information. Some of this is special category information under data protection law, particularly information about health, disability, ethnicity, religion and sexual orientation. Information about criminal allegations or convictions is also specially protected. We use this information only where it is necessary and an additional legal condition applies.

4 Where information comes from

We usually receive information directly from you. We may also receive it from a parent or carer, a person making a referral, an NHS body, local authority, school, social care or other partner, a professional involved in your support, an emergency contact, a funding or commissioning organisation, or from publicly available sources where appropriate.

If we receive your information from someone else, we will normally provide privacy information at our first appropriate contact and no later than required by law, unless an exemption applies. We will consider confidentiality, safeguarding and your reasonable expectations.

5 Why we use information and our legal bases

We must have a lawful basis each time we use personal information. Where special category or criminal-offence information is involved, we must also meet an additional condition under UK data protection law. The bases most commonly relevant to our work are summarised below.

Purpose	UK GDPR lawful basis	Additional condition where required
Responding to enquiries and referrals; assessing needs; providing, coordinating and improving support	Contract or steps requested before a contract; legitimate interests; legal obligation; vital interests; public task where we carry out a function laid down by law and this basis applies	Health or social care; substantial public interest; explicit consent where it is genuinely optional; vital interests

Purpose	UK GDPR lawful basis	Additional condition where required
Safeguarding children and adults, managing risk, incidents and emergencies	Legal obligation; vital interests; legitimate interests; public task where applicable	Substantial public interest including safeguarding; vital interests; legal claims
Managing staff, volunteers, trustees and recruitment	Contract or pre-contract steps; legal obligation; legitimate interests	Employment and social protection law; substantial public interest; legal claims; explicit consent where appropriate
Managing donations, Gift Aid, events, supporter relationships and communications	Consent; legitimate interests; legal obligation; contract	Normally not required; explicit consent or another documented condition if sensitive information is used
Operating our sites, website, app and IT systems; security, fraud prevention and service administration	Contract; consent for optional technologies; legitimate interests; legal obligation	Health or social care, explicit consent or another documented condition depending on the feature
Monitoring quality, reporting outcomes, research and evaluation	Legitimate interests; legal obligation; consent; public task where applicable	Research and statistical purposes with safeguards; health or social care; explicit consent where required. We use anonymised information wherever possible

Consent. Where we rely on consent, you may withdraw it at any time. Withdrawing consent does not affect earlier lawful processing. We do not use consent where you have no genuine choice or where another basis is more appropriate.

Legitimate interests. Our legitimate interests include delivering and improving our charitable services, operating safely and efficiently, managing relationships, protecting people and our systems, preventing misuse and establishing or defending legal rights. We consider the purpose, necessity and possible effect on people and apply safeguards. You may object to this processing in certain circumstances.

When providing information is required. We will explain when information is required by law, by a contract or because it is necessary to provide a service safely. Optional fields will be identified where practical. If required information is not provided, we may be unable to assess a referral, provide part or all of a service, process an application or donation, or meet a legal or safeguarding duty.

6 Children and young people

We take particular care with children's information. We provide age-appropriate explanations wherever possible and involve a parent or carer where appropriate, while recognising that a young person may be able to make their own decisions about information rights. We limit access to those who need the information for their role and share information without consent only where there is a lawful and proportionate reason, including safeguarding.

7 How we use information in the Wellbeing App

The Trust Links Wellbeing App may collect account details and information that users choose to enter, including mood and sleep ratings, journal entries, wellbeing reflections, questionnaire responses and wellbeing or safety plans. Where an app user is receiving Trust Links support or waiting for a service, their app account may be linked securely with their Charitylog record to support continuity and reduce repeated data collection.

Only authorised staff have role-based access. We use anonymised information wherever possible to understand use and improve the app. More detailed, feature-specific information is provided in the app and on our website.

8 Who we share information with

We share personal information only where there is a lawful purpose and only to the extent necessary. Depending on the circumstances, recipients may include:

- NHS organisations, local authorities, schools, health and social care providers, commissioners and delivery partners
- parents, carers, nominated contacts and professionals involved in a person's support, where appropriate
- safeguarding authorities, emergency services, regulators, courts or law-enforcement bodies where required or justified
- funders, evaluators and research partners, normally using aggregated or anonymised information
- IT, hosting, communications, payment, payroll, professional-advice and records-management suppliers acting under contract
- HM Revenue and Customs, the Charity Commission, the Information Commissioner and other bodies where legally required

We do not share identifiable information with funders or research partners simply because they fund or evaluate a service. We use aggregated or anonymised reporting unless identifiable sharing is necessary, lawful and appropriately explained.

9 Our suppliers subcontractors and partners

Some organisations process information for us, for example providers of client-record systems, cloud hosting, email, app support, payroll, payments and secure disposal. We assess relevant suppliers, use written data-protection terms, limit their access and require appropriate security and confidentiality. They may use information only on our documented instructions unless the law requires otherwise.

Where we deliver a service jointly or on behalf of another organisation, the relevant contract and service privacy information will explain the parties' roles and how people can exercise their rights.

10 International transfers

We aim to use UK-based processing where practical. Some suppliers may store or access information outside the United Kingdom. Where this happens, we use a lawful transfer mechanism, such as UK adequacy regulations or approved contractual safeguards, and assess whether further protections are needed.

11 How we protect information

We use proportionate technical and organisational controls appropriate to the sensitivity of the information. These include role-based access, individual user accounts, authentication controls, encryption where appropriate, secure backups, audit information, staff confidentiality requirements, training, supplier assurance, incident management and regular review of access. Access is limited to people who need information for their work.

No system can be guaranteed completely secure. If a personal-data incident occurs, we investigate, limit harm, keep appropriate records and notify affected people and the Information Commissioner where legally required.

12 How long we keep information

We keep personal information according to our retention schedule and securely delete or anonymise it when it is no longer required. The period depends on the purpose, the person's age, commissioning and contractual requirements, safeguarding needs, statutory record-keeping duties and relevant limitation periods.

Service-user and Wellbeing App information is normally retained for up to seven years after the person's last engagement, unless a different legal, safeguarding or contractual period applies. Children's, safeguarding, employment, financial, accident, CCTV and research records may have different periods. We can provide further information about the period applying to a particular record on request.

13 Your information rights

Depending on the circumstances and our lawful basis, you may have the right to:

- be informed about how we use your information
- ask for access to your personal information
- ask us to correct inaccurate or incomplete information
- ask us to erase information in certain circumstances
- ask us to restrict processing in certain circumstances
- object to processing based on legitimate interests or public task, and object at any time to direct marketing
- receive certain information in a portable electronic format
- withdraw consent where consent is our basis
- ask for human involvement where a significant decision is made solely by automated means

These rights are not absolute and an exemption may apply. We will explain our decision if we cannot fulfil a request in whole or in part. We normally respond within one month and may ask for proportionate information to confirm identity.

14 Automated decision making

Trust Links does not currently make decisions producing legal or similarly significant effects about people solely by automated means. If this changes, we will explain how the decision works, its likely effects and the safeguards and rights available.

15 Website cookies and communications

Our website and digital services may use essential technologies needed for security and operation. We ask for consent before using non-essential cookies or similar technologies where required. Details and choices are provided through our website cookie information.

We send fundraising or marketing communications only where permitted by data protection and electronic-communications law. Every electronic marketing message provides a straightforward way to unsubscribe. Service communications, safeguarding messages and information necessary to administer an existing relationship are not marketing.

16 How to contact us or complain

To ask a question or exercise an information right, contact: Matthew King, CEO and Data Protection Compliance Officer, Trust Links Ltd, 47 Fairfax Drive, Westcliff-on-Sea, Essex, SS0 9AG; email: ceo@trustlinks.org

Please contact us first if you have concerns so that we can investigate and respond. You also have the right to complain to the Information Commissioner's Office.

Information Commissioner's Office: www.ico.org.uk/make-a-complaint

17 Changes to this notice

We review this notice at least annually and whenever our services, systems, partnerships or legal obligations materially change. The current version will be published on our website. Where a change could significantly affect people, we will take reasonable steps to bring it to their attention.

Trust Links Ltd | Registered Charity 1092324 | Registered Company 4351216