



THE DONALDSON TRUST

The National Body for Neurodiversity

Privacy Notice – External

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Owner: Director of People and Engagement

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Document Control

Version:

Version	Date	Owner	Reviewer	Approver	Amend
1	Sept 2018	Administration Manager	Lawyers/consultants	CEO	New
2	June 2025	Director of People and Engagement	Burness Paul Leadership Team	ELT	Review Updated to include new external activities

Next Review Due: June 2026

This policy will be reviewed following a significant event and as a minimum every three years.

References:

Policies:

Records Management Policy
Data Subject Access Policy

Forms:

N/A

Records:

Personal (identity and contact) Records
Service Records
Health Records
Feedback Records
Correspondence Records
CCTV Records
Application Record
Background Check Records
Payment Records
Donation Records, including Gift Aid
Publicity Records

Marketing Records

Affiliate Records

Published Records on Political Positions

Qualification Records

Website Technical and Tracking Records

Social Media Records

Introduction

The Donaldson Trust (a charity registered in Scotland number SC017417) is committed to ensuring that your privacy is protected whether you are a user of our services, prospective employee or volunteer, supporter or fundraiser, donor, commercial or professional contact or partner, or if you are simply visiting our website or making an enquiry with us.

Under data protection laws, we have a legal duty to protect any personal information you provide to us whether online, via phone, email, in letters or any other correspondence. We will ensure that such information is only used for the purpose for which it was requested and that your data is held securely.

This privacy policy explains how The Donaldson Trust uses the information it collects about you and procedures that we have in place to safeguard your privacy.

We regularly review this privacy policy. If we make any significant changes to this policy, we will place a prominent notice on our website.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your information changes during your relationship with us, for example a new home address or email address.

Privacy Information

The following sections provide privacy information about what personal information we hold, how it was collected, the purposes we use it for and our legal grounds for using personal information. Different sections might apply to you depending on your relationship with us. We have provided high level information in this privacy notice, if you would like further details please contact us.

Users of our services

This section applies to users of our services and their families / carers.

What information do we hold about you?



Identity Data: titles, full names, copies of identity documents, photographs/videos, date of birth, age, gender, pronouns, nationality and family relationships



Contact Data: telephone number, mobile number, email address and home address



Service Use: information about the type of services provided, including preferences and information collected by members of staff and volunteers, other services accessed (outside Donaldsons), funding and information provided by local authorities or other funding source



Health Data: information about specific support needs, physical or mental health conditions, medication and information provided regarding GP or any other medical professional



Feedback Data: your opinions about the services we provide, case study information about your experiences with us, and your opinions and beliefs which we may gather as part of our external functions (such as consultation responses on government proposals relating to our services)



Correspondence Data: information generated when sending and responding to correspondence with you



CCTV Data: footage of you may be collected by our CCTV and surveillance systems when you attend our premises

How is this information collected?



Direct: most of the information we hold is collected directly from you



Indirect: we may receive information about you from third parties, including third parties that make referrals to us (such as social workers, healthcare providers, NHS trusts, local authorities, other charities)



Generated by us: we may generate information about you in the course of providing services to you



Public domain: we may obtain information from the public domain, including public registers, social media and news articles

How is this information used?



Service Provision: most of the personal information we hold about you is used to provide you or your family member with a service



Service Review and Improvements: we may use your personal information to identify and implement improvements of our services



Internal Operations: we may use your personal information for our internal operations, such as management, auditing, accounting and governance



Public Relations: we may use information about your use of our services and your feedback as case studies or in materials available to the public



Legal Purposes: we may need to share your personal information with public authorities where required by law, and we may process your personal information if required in connection with legal claims



Record Keeping: we may need to retain and use your personal information to maintain records regarding use of our services, or for archiving purposes



Security: we may use CCTV Data for security purposes, to monitor the provision of our services, and in connection with the prevention and detection of crime

Anything else?



If you do not provide us with certain personal information, you may not be able to access our services.

Prospective Employees and Volunteers

This section applies to prospective employees and volunteers applying to work with us.

If your application is successful, we will provide you with a privacy notice explaining what personal data we will process about you as a current employee or volunteer.

What information do we hold about you?



Identity Data: titles, full names, copies of identity documents, date of birth, age, gender, pronouns and nationality, diversity and equality monitoring information



Contact Data: telephone number, mobile number, email address and home address



Application Data: work history, education history, qualification, experience relevant to the role applied for, references and information generated during any interview or assessment processes



Background Check Data: depending on the nature of the position applied for, we may need to conduct identification verification checks, Disclosure Scotland checks, or credit checks to confirm your suitability for a role



Health Data: information about any disabilities or physical or mental health conditions which are relevant to your application, e.g. to support you as part of Disability Confident Scheme or provide reasonable adjustments



Feedback Data: your opinions about our application process



Correspondence Data: information generated when sending and responding to correspondence with you

How is this information collected?



Direct: most of the information we hold is collected directly from you



Indirect: we may receive references about you from third parties (such as your former employers) and we receive the results of any background checks from third parties involved in this process (such as Disclosure Scotland and credit reference agencies)



Generated by us: we may generate information about you during the application and interview process, including feedback



Public domain: we may obtain information from the public domain, including public registers, social media and news articles

How is this information used?



Application Processing: we use your personal information to assess your suitability for the role applied for and for making our decision about your recruitment or appointment



Process Review and Improvements: we may use your personal information to identify and implement improvements of our recruitment processes



Legal Purposes: we may need to share your personal information with public authorities where required by law, and we may process your personal information if required in connection with legal claims



Record Keeping: we may need to retain and use your personal information to maintain statistics regarding our application processes. Your information will be anonymised for this purpose where possible

Anything else?



If you do not provide us with certain personal information, you may not be able to work or volunteer for us

Supporters, Fundraisers and Donors

This section applies to individuals who help organise and participate in fundraising activities for us, and individuals who donate to us or otherwise support our organisation.

What information do we hold about you?



Identity Data: titles and full names. If you are fundraising on our behalf we may also hold copies of identity documents, date of birth, age, gender, pronouns and nationality information



Contact Data: telephone number, mobile number, email address and home address



Payment Data: depending on your payment method for your donation, we may hold bank account details (for direct debits) or payment card details for you. We may also hold information on Gift Aid details depending on whether or not Gift Aid was applied to your donation



Publicity Data: publicity information about the fundraising activities you are involved in or attend, including video, photographs and recordings of any fundraising event



Marketing Data: information about your marketing preferences for receiving information about our organisation, our news and fundraising activities. We also collect information about how you interact with any electronic direct marketing messages we sent to you (such as when you open it and how long you spend reading it)



Correspondence Data: information generated when sending and responding to correspondence with you



Feedback Data: your opinions about our fundraising and donation processes, and your motivations for donating with us (if you are happy to share this with us)



Health Data: if you participate in a high-risk event to raise funds on our behalf (such as a marathon), then we may collect some health information about you

How is this information collected?



Direct: most of the information we hold is collected directly from you



Indirect: we may receive information about you from third party donation and fundraising platforms (such as JustGiving) and third party event organisers



Public domain: we may obtain information from the public domain, including social media



Generated by us: we may generate information about your fundraising activities, support or donations, including publicity data

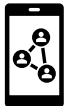
How is this information used?



Donation Processing: we use your personal information to process donations from you



Public Relations: we may use information about your donation or fundraising activities to publicise our organisation and raise awareness of our work



Marketing: we may send you marketing messages to keep you informed about how your donation is being used and to make you aware of other fundraising opportunities



Internal Operations: we may use your personal information for our internal operations, such as management, auditing, accounting and governance



Record Keeping: we may need to retain and use your personal information to maintain records regarding use our fundraising activities and donation (e.g. where necessary to comply with Gift Aid obligations). Your information will be anonymised for this purpose where possible



Process Review and Improvements: we may use your personal information to identify and implement improvements of our fundraising and donation processes

Anything else?



If you do not provide us with certain personal information, we may not be able to accept your donation or allow you to fundraise on our behalf.

Other Contacts (including business clients, service providers, public authority contacts and affiliates)

This section applies to our professional contacts, including our professional

advisers, contacts at organisations we interact with (including service providers, public authorities, other charities, parliamentarians, government officials and decision-makers and other partners), business clients who we provide paid-for services to and any public figures or spokesperson we are affiliated with.

What information do we hold about you?



Identity Data: titles and full names



Contact Data: professional telephone number, mobile number, email address and work address



Affiliate Data: If you are looking to be a spokesperson or public affiliate of our organisation, we may collect information about your ethics, values and responsible business practices (including financial information) available in the public domain



Published Data: if you are a government official or parliamentarian (or if you work for a government or public authority), we may collect information available in the public domain about your political position on public policy issues related to the services we provide, as part of our external functions



Qualifications Data: if you work for one of our professional advisers or service providers, we may collect information about the qualifications and experience of individuals acting as our professional advisers or service providers, including secondees and contractors



Service Use: if you work for one of our business clients, we may collect information about the type of services provided, including training courses provided, training records, details of attendees and any certifications awarded



Billing Data: if you work for one of our business clients, we may collect billing details for services provided and received, including bank account details or payment card details.



Feedback Data: if you work for one of our business client, we may collect your opinions about the training services we provide



Correspondence Data: information generated when sending and responding to correspondence with you



CCTV Data: footage of you may be collected by our CCTV and surveillance systems when you attend our premises

How is this information collected?



Direct: we may collect data directly from you



Indirect: we may receive information about you from your employer, who may be one of our professional advisers, service providers or business client



Generated by us: we may generate information about you in the course of providing training services or receiving services from you



Public domain: we may obtain information from the public domain

How is this information used?



Affiliate Arrangements: we may use personal information when working with an individual affiliate or spokesperson who will support and promote our work and values



External Function: we may use personal information as part of our external functions, which may involve liaising with public authority and government officials on public policy matters impacting our services



Provision of Training Services: we may use personal information where necessary to provide training services



Receipt of Professional Advice and Services: we may use personal information when instructing and receiving professional advice and other services



Internal Operations: we may use your personal information for our internal operations, such as management, auditing, accounting and governance



Legal Purposes: we may need to share your personal information with public authorities where required by law, and we may process your personal information if required in connection with legal claims



Service Review and Improvements: we may use your personal information to identify and implement improvements of our training services



Record Keeping: we may need to retain and use your personal information to maintain records regarding use of our services and procurement of services from professional advisers and third parties



Security: we may use CCTV Data for security purposes, to monitor the provision of our services, and in connection with the prevention and detection of crime

Anything else?



If you do not provide us with certain personal information, we may not be able to provide you with training services or instruct you to provide us with professional advice or other services

Website Visitors

This section applies to users of our website and social media pages, including people who submit service enquiries to us.

What information do we hold about you?



Identity Data: titles and full names



Contact Data: telephone number, mobile number, email address and home address



Technical Data: technical information about how you interact with and use our website, including accessibility settings and language preferences



Tracking Data: information collected by cookies and other tracking technologies.



Correspondence Data: information generated when sending and responding to correspondence with you (including messaging via our social media pages and when you submit an enquiry via our website)



Social Media Data: information about you from your social media profile and we may receive information about how you

interact with social media from social media platforms (including Meta)

How is this information collected?



Direct: most of the information we hold is collected directly from you



Generated by us: we may generate information about you in the course of corresponding with you



Technical Measures: your information may be collected automatically when you visit our website or social media pages



Social Media Providers: we may obtain Social Media Data from social media providers

How is this information used?



Website Functionality: certain information is needed in order for our website to function in accordance with your accessibility and other preferences



Website Review and Improvement: we may use your personal information to identify and implement improvements of our website



Internal Operations: we may use your personal information for our internal operations, such as responding to enquiries, management, auditing, accounting and governance

Anything else?



More information about what cookies and tracking technologies we use and the information they collect is available in our Cookies Policy, available on our website.

Legal Grounds

To comply with UK data protection laws, we can only use your personal information when we have legal grounds to do so. Our legal grounds for using your personal information are:



Consent: we may need your express consent to collect health data, diversity monitoring information and marketing

preferences. We may also need your express consent to conduct background checks



Contract: we may collect information where required to take steps necessary for entering into a contract with you, or where necessary to perform our obligations under a contract with you



Legal Obligation: we may process your personal information in order to comply with legal obligations imposed on us by statutes and regulations, including safeguarding, employment and tax laws



Legitimate Interests: we may process your personal information where necessary for our legitimate interests or the legitimate interests of a third party. These interests may include pursuit of the purposes outlined above.

Retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Further information is outlined in our Records Management Policy.

Information Sharing

We may share your personal information with the following third parties:



Service Providers: we rely on various third party service providers who may process your personal information as part of the services they provide to us, including our IT system providers



Professional Advisers: we may share your personal information where necessary with our professional advisers, such as our accountants, insurance providers



Public Authorities: we may share your personal information with public authorities where required by law or where necessary for the public interest or to enable the public authorities to provide their public functions



Regulators: we may share your personal information with regulators where required by law or on their reasonable request. Our regulators include the Information Commissioner's Office, the Office of the Scottish Charity Regulator, HMRC, Care Inspectorate, Education Scotland, GTCS and Disclosure Scotland.



Law Enforcement: where necessary, we may share information with law enforcement agencies for the prevention or detection of crime, or the apprehension of offenders. This may include sharing of CCTV data



Intra-Group: we share personal information amongst members of our corporate group for our internal operations

International Transfers

Your personal information will not normally be transferred outside of the UK.

In the rare circumstances where we require to transfer your personal data outside the UK to countries which have laws that do not provide the same level of data protection as UK law, we ensure a similar degree of protection is afforded to your information by using specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection that it has in the UK.

Security Measures

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those members of staff who have a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your Rights

Data protection laws give you several rights as set out below. If you would like to exercise any of your rights, please contact us using the details located above.

- ✓ **Access your personal information:** you may request access to a copy of your personal information. All requests for access to personal information should be made to us in writing. Further detail is available within our Data Subject Access Request Policy.
- ✓ **Withdraw consent:** if you have given us consent to use your personal information to send you communications, you can withdraw your consent at any time.
- ✓ **Rectification:** you may ask us to rectify and update any inaccurate information we hold about you or to complete any information that is incomplete.
- ✓ **Erasure:** you may ask us to delete your personal information.
- ✓ **Portability:** you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or ask for us to send such personal information to another data controller.
- ✓ **Restriction:** you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- ✓ **Object:** you may object to our processing of your personal information in accordance with this Notice. Please contact us, providing details of your objection.

You may make a complaint about our data processing activities by contacting us using the details above. Alternatively, you may make a

complaint to the UK supervisory authority, which is the Information Commissioner's Office, using the following details:



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



0303 123 1113 (local rate) / 01625 545 745 (national rate)



www.ico.org.uk/concerns

Contact Details

This privacy policy was prepared to be as concise as possible to give you a clear understanding of how your personal information will be stored and used. If you would like more information, please contact our Data Protection Officer at:



Data Protection
Officer
The Donaldson Trust
Preston Road
Linlithgow
West Lothian
EH49 6HZ



dpo@donaldsons.org.uk