



PRIVACY POLICY

BAKO Sanctuary Community Interest Company

1. INTRODUCTION

BAKO Sanctuary Community Interest Company ("we," "us," "our," or "BAKO") is committed to protecting your privacy and personal information. This Privacy Policy explains how we collect, use, store, and protect your personal data when you use our services or visit our website.

We understand that many people who contact us are in vulnerable situations. We take our responsibilities regarding your personal information very seriously and handle all data with the utmost care and confidentiality.

Data Controller:

BAKO Sanctuary Community Interest Company

CIC Number: 16897158

Contact: dpo@bakosanctuary.org.uk

2. INFORMATION WE COLLECT

2.1 Personal Information You Provide

When you contact us or use our services, we may collect:

Contact Information:

- Name
- Email address
- Phone number
- Postal address
- Preferred method of contact

Support-Related Information:

- Information about your support needs
- Details of your circumstances relevant to the support we provide
- Information about barriers you're facing (e.g., immigration status, housing situation, safeguarding concerns)
- Notes from support sessions and meetings
- Correspondence with BAKO staff and peer supporters

Sensitive Personal Data (Special Category Data):

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Email: info@bakosanctuary.org.uk

www.bakosanctuary.org.uk



With your explicit consent, we may collect sensitive information necessary to provide appropriate support, including:

- Information about domestic violence or abuse
- Immigration status and related documentation
- Information about substance use
- Mental and physical health information
- Information about Children's Services involvement
- Racial or ethnic origin
- Religious beliefs (if relevant to support needs)

We will only collect sensitive personal data where:

- You have given explicit consent, OR
- It is necessary to protect your vital interests or those of your children, OR
- It is necessary for reasons of substantial public interest (safeguarding)

2.2 Information We Collect Automatically

When you visit our website, we may automatically collect:

- IP address
- Browser type and version
- Device information
- Pages visited and time spent on pages
- Referring website
- Cookie data (see our Cookie Policy)

3. HOW WE USE YOUR INFORMATION

3.1 Lawful Basis for Processing

We process your personal data under the following lawful bases:

Consent: You have given clear consent for us to process your personal data for specific purposes (e.g., providing support services, sending updates).

Legitimate Interests: Processing is necessary for our legitimate interests in providing peer support services, improving our services, and operating as a Community Interest Company, provided these interests do not override your rights.



Legal Obligation: Processing is necessary to comply with legal obligations, including safeguarding duties.

Vital Interests: Processing is necessary to protect your vital interests or those of another person (e.g., safeguarding children or adults at risk).

3.2 Purposes of Processing

We use your personal information to:

Provide Support Services:

- Assess your support needs
- Match you with appropriate peer supporters
- Provide one-to-one and group support
- Refer you to appropriate external services
- Communicate with you about your support
- Maintain records of support provided

Safeguarding:

- Fulfil our safeguarding duties to protect children and vulnerable adults
- Share information with relevant authorities when legally required (see Section 4)

Service Improvement:

- Monitor and evaluate the quality and effectiveness of our services
- Gather anonymized feedback and statistics
- Identify areas for service development
- Report to funders and stakeholders (using anonymized data only)

Administration:

- Respond to your inquiries
- Process volunteer applications
- Manage partnerships and referrals
- Comply with legal and regulatory requirements

Communication:

- Send you information about our services
- Provide updates about support available
- Share resources and information relevant to your needs (with consent)

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4. INFORMATION SHARING AND DISCLOSURE

4.1 When We Share Information

We will only share your personal information in the following circumstances:

With Your Consent:

When you have given explicit consent for us to share information with:

- Regulated immigration advisers or solicitors
- Healthcare providers
- Housing services
- Employment support services
- Other support organizations

Safeguarding Duties:

We have a legal duty to share information to protect children and vulnerable adults from harm, even without consent. We will share information with:

- Children's Social Care (if a child is at risk of significant harm)
- Adult Social Care (if a vulnerable adult is at risk)
- Police (if there is immediate danger or criminal activity)
- Local Authority Designated Officer (LADO) (for allegations against professionals)

We will always be transparent with you about when we need to share information for safeguarding purposes, except where this would put someone at greater risk.

Legal Obligations:

We may disclose information when legally required by:

- Court orders or legal proceedings
- Law enforcement agencies (with appropriate legal authority)
- Regulatory bodies (e.g., CQC, Ofsted, OISC if we become regulated)
- HM Revenue & Customs

Service Providers:

We may share information with trusted service providers who help us operate, including:

- IT and database providers (e.g., Salesforce for case management)
- Email and communication platforms
- Website hosting providers
- Payment processors (for donations)

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All service providers are required to keep your information secure and confidential and may only use it for the purposes we specify.

4.2 What We DON'T Share

We will NEVER:

- Share your information with immigration enforcement unless legally compelled by court order
- Sell your personal data to third parties
- Share your information for marketing purposes
- Disclose your immigration status or other sensitive information to unauthorized parties
- Share more information than is necessary for the specific purpose

5. DATA SECURITY

We take the security of your personal information seriously and implement appropriate technical and organizational measures to protect it from unauthorized access, disclosure, alteration, or destruction.

Security Measures Include:

- Secure, password-protected databases
- Encrypted data transmission (SSL/TLS)
- Access controls limiting who can view personal data
- Regular staff and volunteer training on data protection
- Secure storage of physical records (locked filing cabinets)
- Regular security updates and monitoring
- Confidentiality agreements for all staff and volunteers

Access to Information:

Personal information is only accessible to:

- BAKO staff and volunteers who need it to provide support
- Designated safeguarding leads
- Authorized service providers under strict confidentiality agreements

All staff and volunteers are DBS-checked and trained in confidentiality and data protection.

6. DATA RETENTION

We keep your personal information only for as long as necessary to fulfil the purposes for which it was collected.

Retention Periods:

Active Support Cases: Retained for the duration of support plus 6 years after case closure

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Safeguarding Records: Retained until the child reaches age 25, or 6 years after case closure for adults (in line with safeguarding best practice)

Contact Inquiries (no service provided): Retained for 1 year

Financial Records: Retained for 7 years (legal requirement)

Volunteer Records: Retained for 6 years after volunteer relationship ends

Anonymized Data: May be retained indefinitely for statistical and research purposes
After retention periods expire, personal data is securely deleted or destroyed.

7. YOUR RIGHTS

Under UK GDPR and Data Protection Act 2018, you have the following rights:

7.1 Right of Access

You can request a copy of the personal information we hold about you (Subject Access Request). We will provide this within one month, free of charge.

7.2 Right to Rectification

You can ask us to correct inaccurate or incomplete personal information.

7.3 Right to Erasure ("Right to be Forgotten")

You can request deletion of your personal data in certain circumstances, such as:

- The data is no longer necessary for the purpose it was collected
- You withdraw consent (where consent was the lawful basis)
- You object to processing and there are no overriding legitimate grounds

Important Exception: We may not be able to delete information if we have a legal obligation to retain it (e.g., safeguarding records, financial records).

7.4 Right to Restrict Processing

You can ask us to limit how we use your data in certain circumstances, such as when you contest the accuracy of the data.

7.5 Right to Data Portability

You can request a copy of your data in a commonly used, machine-readable format to transfer to another service provider.

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7.6 Right to Object

You can object to processing based on legitimate interests. We will stop processing unless we can demonstrate compelling legitimate grounds that override your interests.

7.7 Rights Related to Automated Decision-Making

We do not use automated decision-making or profiling.

7.8 Right to Withdraw Consent

Where we process data based on consent, you can withdraw consent at any time. This will not affect the lawfulness of processing before consent was withdrawn.

To Exercise Your Rights:

Contact us at: dpo@bakosanctuary.org.uk

We will respond to requests within one month. If the request is complex, we may extend this by up to two months and will inform you.

8. CHILDREN'S PRIVACY

We sometimes provide support to families with children. When collecting information about children, we ensure:

- A parent or guardian provides consent (for children under 16)
- We collect only information necessary for safeguarding and support
- Information about children is stored with enhanced security
- We follow safeguarding best practices and legal requirements

9. INTERNATIONAL TRANSFERS

We do not routinely transfer personal data outside the UK. If we ever need to do so, we will ensure appropriate safeguards are in place and will inform you.

10. COOKIES AND WEBSITE TRACKING

Our website uses cookies to improve your experience. For detailed information about cookies we use and how to manage them, please see our separate Cookie Policy [[link](#)].

Essential Cookies: Necessary for website functionality

Analytics Cookies: Help us understand how visitors use our site (anonymized data)

Preference Cookies: Remember your settings and preferences

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You can control cookies through your browser settings.

11. THIRD-PARTY LINKS

Our website may contain links to external websites. We are not responsible for the privacy practices or content of third-party sites. Please review their privacy policies before providing personal information.

12. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will notify you of significant changes by:

- Posting the updated policy on our website with a new "Last Updated" date
- Emailing active service users (if the change affects how we handle their data)

We encourage you to review this policy periodically.

13. COMPLAINTS

If you have concerns about how we handle your personal data, please contact us first:

Data Protection Contact:

Email: complaints@bakosanctuary.org.uk

Address: 42 Ashburnham Court, Ashburnham Road, Bedford, MK40 1DY.

We will investigate and respond to your complaint promptly.

Right to Complain to the ICO:

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Phone: 0303 123 1113

Website: www.ico.org.uk

Email: casework@ico.org.uk

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14. CONTACT US

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us:

BAKO Sanctuary Community Interest Company

Email: dpo@bakosanctuary.org.uk

Address: 42 Ashburnham Court, Ashburnham Road, Bedford, MK40 1DY.

Website: www.bakosanctuary.org.uk

CIC Number: 16897158

Registered: 8 December 2025

15. CONSENT STATEMENT

By using our services or providing us with your personal information, you acknowledge that you have read and understood this Privacy Policy.

For sensitive personal data, we will always obtain your explicit, informed consent before processing. You can withdraw consent at any time by contacting us.

This Privacy Policy is effective from 26/01/2026 and was last updated on 26/01/2026

BAKO Sanctuary Community Interest Company

Supporting families. Building community. Empowering change.

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