**The Whitechapel Centre**

**Privacy Policy**

**Introduction**

The Whitechapel Centre promises to protect and respect your privacy. This Privacy Policy explains how we use any personal information we collect about you. It applies to information we collect about:

* Visitors to our website;
* People who use our services;
* People who apply to or are referred to our services;
* People who support us, take part in events or fundraise for us;
* People we contact for marketing purposes.

Job applicants, current and former employees and volunteers are covered in a separate policy.

This document covers how we process any personal information you provide to us, as well as how we're committed to keeping it safe and managing it in line with data protection laws.

For your convenience we explain our approach in respect of two groups:-

1. Our Supporters, Donors and those who support us with campaigns, events, fundraising and social media (pages 1 to 5)
2. People who use (or apply to use) our services (pages 5 to 10)

For information regarding your rights, how to seek more information or make a complaint see pages 10 to 11

**Our Supporters**

Our supporters play an essential role for The Whitechapel Centre, either by donating goods, volunteering time, fundraising or making a financial donation. The information you provide helps us to carry out our life changing work, and allows us to let you know about the difference you're making.

**What information do we collect?**

This will depend on your interaction with The Whitechapel Centre. We will not collect more information that we need to fulfil our stated purposes and will not retain it for longer than is necessary.

**For visitors to our website:**

We collect information when you submit a form to contact us this allows us to respond to your feedback or referral, direct it to the correct team, and contact you with a response. Website usage information is collected using cookies; Weebly and Google Analytics are used to collect standard anonymous internet log information and details of visitor behaviour patterns.

**For people wanting to support** **us or take part in fundraising:**

The information we collect is likely to include some of the following information:

* Name
* Contact details
* Date of birth
* Social media details
* Bank account details – when you make a donation on our website the charity does not record or store your bank details. All online processing of card payments in managed externally by a payment processing company on behalf of the charity.
* Why you have decided to donate to us. We will never make this question mandatory, and only want to know the answer if you are comfortable telling us
* And where appropriate, Information relating to your health (for example if you are taking part in a high risk event)

**For children’s data:**

We collect and manage information from children, and aim to manage it in a way which is appropriate to the age of the child. Information is usually collected when children attend our events or fundraise for us.

Where possible and appropriate we will seek consent from a parent or guardian before collecting information about children. Our events have specific rules about whether children can participate, and we‘ll make sure advertising for those events is age appropriate.

**How we collect information about you**

We collect information in the following ways:

**Information you provide to us directly**

You may give us information in order to sign up for one our events, make a donation, or otherwise communicate with us.

**Information you provide indirectly**

Your information may be shared with us by other organisations e.g. for fundraising related activities e.g. Nightrider event or fundraising sites like Just Giving or Virgin Money Giving.

These independent third parties will only pass on your information when you have given your consent that you wish to support or hear from The Whitechapel Centre. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

**Information from other sources**

* **Social Media -** Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.
* **Information available publicly -** This may include information found in places such as Companies House and information that has been published in articles/ newspapers.
* **Website** - When you use our website your personal data is collected using “cookies” and other tracking methods.

**How we use and process information**

We will not share any of the information provided to us in any interaction with any third parties for

marketing purposes. The information you provide to us will be held securely by us and/or our data processors whether the information is in electronic or physical format. We will not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

After we have received your information, there are a variety of ways in which we might use it to ensure we give you the best possible service.

**For supporters** we will mainly use your data to:

* Administer your donation or support your fundraising, including processing gift aid
* Keep a record of your relationship with us
* Ensure we know how you prefer to be contacted
* Understand how we can improve our services, products or information.

**Direct Marketing:**

With your consent, we will contact you to let you know about the progress we are making and to ask for donations or other support. Occasionally, we may include information from partner organisations or organisations who support us in these communications. You can opt out of these communications at any time by contacting us on 0151 207 7617 or fundraising@whitechapelcentre.co.uk

We do not sell or share personal details to third parties for the purposes of marketing. However, if we run an event in partnership with another named organisation your details may need to be shared. We will be very clear what will happen to your data when you register.

**Meeting our legal obligations**

If we have a legal obligation to use or disclose information about you for instance, where we are ordered by a court or regulatory authority or we are legally required to hold donor transaction details for Gift Aid or accounting/tax purposes, or to HMRC, we will need to share relevant personal information with the organisation concerned.

**Legitimate Interests**

In certain instances, we may collect and use personal information where this is necessary for our own legitimate interest.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Privacy Policy and that does not intrude on your privacy or previously expressed marketing preferences.

**How we keep your information safe**

We ensure that there are appropriate technical controls in place to protect your personal details. For example our online forms are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

**Who has access to your data?**

**We will never sell or pass on your personal information to third parties for their own marketing purposes.** There may be some third parties that we need to share personal information with,

including the following:

* Our advisors, in order to help us better manage, support or develop our organisation and comply with legal and regulatory obligations;
* Our partners including, for example, event organisers we work with;
* Law enforcement bodies and/or regulatory entities, in order to comply with any legal

obligation or court order.

We use external companies to collect or process personal data on our behalf. We do comprehesive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data

protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed

consent. However, if you do choose to share your information with us publicly (for example, photos or footage on social media), then it's possible that other people may have copied this information during the time that it was live, and therefore use of it is beyond our control.

**Service Users**

This part of the policy deals with our collection and use of information in relation to people that use our services, and is governed by the principle of only collecting and using personal details in order to provide a service and to meet our legitimate interests including to protect our service

users and workers.

The Whitechapel Centre promises to protect and respect your privacy. This privacy statement describes why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us, both by the individuals/households receiving our

services and by others.

**What information do we collect?**

We hold personal data about you gathered as part of the process of assessing your needs, assessing and managing risk and planning and agreeing your support.

Information may include

* Personal information including name, address, date of birth, ethnicity, gender etc.
* Information about your needs – this will vary greatly from individual to individual but can include highly personal information in relation to housing need, financial circumstances, health, mental health, substance use, offending etc.
* Information about any risks to you or others – this will include, for example information about people who are at risk of self-harm or domestic abuse
* Information about what support we have provided to you – we will record what actions our workers have taken and how you have responded e.g. if we have helped someone get a property; if someone with mental health issues is engaging with the community mental health team and so-on

**Why do we hold data and how do we use it?**

The main reason we hold information about you is to enable us to provide the support that you need. If we are to support you around, say, a housing matter, we need to know about your housing circumstances so that we can agree what needs to be done to protect your accommodation or help you find accommodation. Everyone’s circumstances and needs are different. Some people may need help in relation to financial circumstances or debt to prevent them losing their accommodation. If so we will need to know about these issues so that we can work with you to address them. For other people issues will be different e.g. they may need help in relation to health, mental health or substance use.

Another reason why we collect and hold data is to assess and manage risk. Some people we work with may be at risk, for example they may be at risk of domestic violence or financial exploitation or they may be at risk of harming themselves. We will need to gather information to help protect that person. In a few cases our clients may present risks to others. Again we need this information to manage any risk.

We also hold some data to help us assess how effective our work is. We want to know about how many people we are finding accommodation for, how many are maintaining their accommodation. We want to know whether people who have received our support are coping better. We hold data on age, gender, ethnicity, sexual orientation and alike in order to help us ensure we are reaching all parts of the community and that we are treating everybody fairly. This information helps us make decisions about what works best.

We hold data about feedback we have received from our clients. During the course of your support we may ask your opinion on the service you are receiving and what might be improved. From time to time people make complaints about the service and we need to keep this information so that we can learn from what may have gone wrong.

**How do we collect the data we hold?**

Most of the information we gather about you will be Information you provide to us directly. You will share with us information when first applying for/ seeking support; when we ask you questions to assess your needs and support and as part of us providing you with support.

You may also give us information indirectly. This may happen if you agree with another agency that they can refer you to us for support. Agencies that refer to us include the Local Authority, landlords/ housing providers, community mental health teams, health agencies and treatment services. These agencies should get your consent to refer to us and let you know what information they are intending to share with us.

In some cases we may approach other agencies and ask them information about you. We will only do so if we have your permission or in other special circumstances (see confidentiality below). The agency we approach should also assure themselves that they have your permission to share the

information we have asked for.

**Children’s Data**

We may collect and manage information about children as part of our delivery of support to the family as a whole. We will source information about children through their parent or guardian and obtain the parent/guardian’s consent.

We may gather information from children directly for example in delivering children’s activities at our family centres. If this involves any personal information, we will obtain the parent/guardian’s consent to do this.

**What is the legal basis for us collecting information about you?**

The legal basis for us collecting and holding information about you depends on the service that we are providing to you.

**Consent** – we will collect, store and where appropriate share information about you where you have given your consent for us to do this.

**Legitimate Interest** – we may collect information about you where we believe this will help you receive the right support from us

**Public Interest** – we may collect information about you under public interest where we are working to assist with public law. Where this happens, we will be clear about why we have to hold or share the information and why.

**Contract** – we may need to collect or hold information in order to fulfil a contract. This may be the case, for instance, if you have a license agreement or tenancy with us.

**How long do we keep information for?**

We will continue to hold information about you throughout the time that you are receiving support from us and for a period after that. We keep this information for a period after your support has ended in case you need further support or there is something we need to follow up. How long we keep the information will depend on the format it is held.

Information on our own IT systems will be held for up to 6 years after your case has been closed except in rare circumstances (see below). Paper records will similarly be held up to 6 years.

Many of our services are managed using the Mainstay Housing & Support Gateway. All Client Records held on this system will be removed if there has been no update/event on the client’s record within the last 7 years.

Where client records are removed, there will still be a record but it will not have any identifiable details (e.g. your name, address, date of birth and all details of your support will be removed). The record that remains will hold equalities information such as gender and ethnicity and date of referral and anonymised data included in e.g. performance reports, audits, service planning documents.

You can ask for your information to be removed/destroyed sooner than the timescales given above if you wish. If you do so, we will remove/destroy your record straight away or as soon as we are able to subject to any legal or contractual constraints. For example, we may need to keep your record for a short while to validate the performance information we send to commissioners.

In some exceptional circumstances, we may need to keep fuller information or keep information for longer. For example if there are significant risks to other service users or to staff then we may need to keep this information in case the service user came back to us for further support.

If you have any questions or concerns about how and why we collect and store information about you or the legal basis for our doing so, you should contact the Data Protect Team (see questions or complaints below).

**How we keep your information safe?**

We are committed to keeping the data we have about you safe and secure. Data may be held in various formats. These include:-

* Information held on The Whitechapel Centre’s internal IT systems
* Information held as paper copy
* Information held on databases hosted by external agencies

We take every effort to protect your personal data from misuse, interference, loss, unauthorised access, modification or disclosure. We have put in place suitable physical, electronic and

managerial procedures to safeguard and secure the information we collect – for example, we protect your data by ensuring all our laptops are fully encrypted .

Information is retained in secure electronic and paper records and access is restricted to only those who need to know. Everyone working for The Whitechapel Centre is subject to, inter alia, a Code of Conduct & Professional Boundaries policy, an IT Policy and a Data Protection Policy.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot

guarantee the security of data transmitted to us.

Information held as paper copy may include notes assessment and support meetings your support worker has with you. In some cases these will take place off-site from Whitechapel Centre’s

premises, for example if your worker visits you in your own home. Any paper notes of this kind will be kept in an opaque closed folder while being transported to the Whitechapel Centre’s premises. Those notes may then be typed up and held on internal IT systems in which case they will be

subject to the Security precautions above. Paper records will then be shredded and disposed of as confidential waste. If records are kept in a paper format they will be stored in a locked filing cabinet.

Many of our services are managed using IT databases hosted by external agencies (such as the Mainstay Housing & Support Gateway). In such circumstances we ensure that they keep all personal data that they process on our behalf secure and are compliant with EU Data Protection Regulations.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

**Confidentiality**

Confidentiality is the right to keep information within previously agreed/acknowledged boundaries. In doing so, it provides protection for you in that you know in what situations disclosed information may be shared and with whom.

Confidentiality at Whitechapel is held within the staff team. This means that information disclosed by you to one member of staff may be disclosed to other members of staff within the Whitechapel Centre, if it is information which they need to know.

Many of our services are managed using IT databases accessible by commissioners (such as the Mainstay Housing & Support Gateway). If information about you is to be held on these systems you will be asked to sign a consent to disclose form which gives your agreement to share information for the purpose of identifying potential risks and support needs (see Appendix 1). If you are not happy about information about you being held on such systems, other arrangements can be put in place.

Information will not normally be passed to outside agencies without your consent.

The Whitechapel Centre has developed a number of partnerships and joint working relationships with the expectation of improving access and service delivery for people who use the Whitechapel Centre. Some of these arrangements may require a higher degree of disclosure than we usually give. In these circumstances, the situation will be fully discussed with you before referring you to another agency. We will tell you what information needs to be disclosed and to whom and any potential consequences there may be because of the disclosure. It would be your decision whether you want this information disclosed and for the referral to be made.

Whilst information is not normally passed to outside agencies, confidentiality may be broken if:

* You are considered to pose a risk to someone else.
* You are considered to be at risk of suicide, self harm or other serious harm.
* You are a vulnerable adult and you are considered to be at risk of self neglect or at risk from someone else
* A child is considered to be at risk of abuse, neglect or ‘significant harm’.
* We receive a request from the police and not releasing the information would significantly harm any attempt to prevent/detect a crime or catch a suspect
* We have a legal obligation to use or disclose information about you, for instance, where we are ordered by a court or regulatory authority

In some cases, you may ask that personal information about our work with you to be shared with a non-professional (e.g. a family member or friend). We would usually ask that you share this information yourself. However, there may be occasions where you are unable to do this (e.g. because you don’t have access to a phone or are under the influence of a substance). If this is the case, we will ask you to sign a consent form spelling out what information we may disclose and who to. Disclosure of information does not mean that the person we disclose to can influence the work we undertake with you. If you would like your friend or family member to act as an advocate to help you express your opinions and requirements then you should discuss this with your Support Worker. Anyone acting as an advocate will be asked to only meet with your Support Worker while you are present so they can be involved in the support planning process. A copy of the consent for is includes as Appendix 2

**General**

**Your Rights**

You have the right to:

* be told how your personal information will be used;
* request a copy of the information we hold about you;
* update or amend the information we hold about you if it is wrong;
* change your communication preferences at any time (i.e. how you have said you want us to contact you);
* ask us to restrict the processing of your personal information if there is a disagreement about its accuracy or legitimate use;
* ask us to remove your personal information from our records;
* request an electronic copy of your personal information be sent to you, or another organisation;
* withdraw any consent you have given to allow us to share information with other agencies or individuals
* object to the processing of your information on the basis of a legitimate interest or for statistical purposes;
* ask us for human intervention or to challenge any such decision where we take automated decisions in relation to your personal information; or
* raise a concern or complaint about the way in which your information is being used.

The information you provide will be retained by us in accordance with applicable laws. We will take reasonable steps to destroy or de-identify personal information we hold if it's no longer needed in connection with the purpose(s) for which it was collected and/or processed.

**Updates to this Policy**

This Privacy Policy was updated in **October 2018**. We will keep it under review and make updates from time to time. If we make any significant changes to the way we treat your personal information, we will make this clear on The Whitechapel Centre website or by contacting you directly.

**Question or Complaints**

If you have any questions, concerns or complaints, or would like to obtain a copy of the information we hold about you, please contact the Data Protection Team at:

Data Protection

The Whitechapel Centre

Langsdale Street

Liverpool L3 8DT

Email: [info@whitechapelcentre.co.uk](mailto:info@whitechapelcentre.co.uk)

Or you can find out more on the Information Commissioner's Office website at <https://ico.org.uk/>

CONSENT TO DISCLOSURE AND USE OF INFORMATION

This form (together with the MainStay Information Sharing Protocol) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation 2016 The Whitechapel Centre shall be the data controller.

The Merseyside MainStay Housing and Support Gateway may contact relevant agencies to request additional information that will enable them to either process your application or assist them in providing support services to you. The purpose of this is to identify potential risks to you or to others and to identify any support needs that you may have prior to providing support services to you.

For this purpose, any or all of the agencies below may be contacted to provide information about you:

* Benefits/Income (E.g. Council Tax, Housing Benefit, Benefit Agency)
* Housing (E.g. Housing Associations, Hostels, Previous Accommodation Providers)
* Legal (E.g. Solicitors)
* Education/Training (E.g. Schools, Colleges, Training Providers and Connexions)
* Health (E.g. GP, Mental Health Services, hospital)
* Statutory Agencies (E.g. Social Services, Police, YOT, Probation, Prison Service, Home Office, NASS,)
* Drugs and Alcohol Services (E.g. Detox units, rehabilitation units, Drug Workers)
* Homeless Organisations
* Family Members and Friends
* Other specified persons and Agencies (please state)­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Information that you provide to us may be shared with any or all the organisations set out overleaf (the “Merseyside MainStay Housing and Support Gateway”) \* for the purpose of providing support services to you. This information will include an assessment of your needs/risks and the support that is provided to you. Your data will be stored and retained on the MainStay IT system for a maximum period of 7 years from your last contact with us.

The Whitechapel Centre *and the organisations set out overleaf may combine the information you give to* The Whitechapel Centre *and information provided by the agencies above. They may use this information for the purposes set out above.*

*If you have a complaint in relation to the processing of your personal data, you should contact Judith Bulmer, Services Manager on 0151 207 7617 or* [*Judith.bulmer@whitechapelcentre.co.uk*](mailto:Judith.bulmer@whitechapelcentre.co.uk) *with full details of your complaint.**You also have the right to fully or partially withdraw consent and ask us to not process and erase your data by contacting Judith Bulmer, details as above.*

*I understand the terms outlined on page 1 and agree to the storage and sharing of my personal data in the manner set out above information specified above. I understand that all information provided by me will be processed, stored and treated in accordance with the General Data Protection Regulation 2016*

Service User Consent Signature: Date: \_\_\_\_\_\_

Service User Name: DOB \_\_\_\_\_\_\_\_\_\_\_

Current Address (where applicable)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signed on behalf of MainStay: \_\_\_\_ Date: \_ \_\_\_\_\_

Organisation – The Whitechapel Centre

**\* LIST OF ALL MERSEYSIDE MAINSTAY SERVICES (Services are listed under one authority only)**

|  |  |  |
| --- | --- | --- |
| * Adullam Homes * Amadudu * Bosco Society * Brownlow Group Practice * Centre 63 * Changing Lives * City of Liverpool YMCA * Creative Support * DISC * Emmaus UK * Excel Housing * Forum Housing Association * First Step * Halton Borough Council & commissioned support services * Irish Community Care Merseyside * Knowsley Council & commissioned support services * Light for Life * Liverpool City Council & commissioned support services * Liverpool Housing Trust | * Local Solutions * Magenta Living * Merseyside Probation * Nacro * New Charter * New Start * Nightstop Communities * North West Property Custodians Ltd * Nugent Care * P3 (People, Potential, Possibilities * Phoenix Futures * Plus Dane * Regenda Homes * Riverside * SAHA * Sahir House * Salvation Army * Sefton Council & commissioned support services * SHAP * Shelter Merseyside * St. Helens MBC & commissioned support services | * Stonham * The Basement * The Whitechapel Centre * The Hope Centre * Venus Resource * Veterans in Sefton * Village Housing * Waves of Hope * Wirral Borough Council & * commissioned support services * Wirral Churches’ Ark Project * Wirral Independent Living Services * Wirral Women and Children’s Aid * YMCA Wirral   SOFTWARE SUPPLIERS   * CDP Soft * Capita (Advantage Impact) |

**The Whitechapel Centre**

**Consent to Share and Protect Your Personal Information**

|  |
| --- |
| Name: Date of Birth: \_\_\_\_\_/\_\_/\_\_\_\_\_\_\_\_ |

|  |
| --- |
| **Disclosure of Information to Non-Professionals** |
| If you would like personal information about the work you undertake with The Whitechapel Centre to be shared with a non-professional (e.g. a family member or friend) we would ask that you undertake to share this information yourself. However, there may be occasions where you are unable to do this (e.g. because you don’t have access to a phone or are under the influence of a substance).  This form spells out what information we may disclose and who to. Disclosure of information does not mean that the person we disclose to can influence the work we undertake with you. If you would like your friend or family member to act as an advocate to help you express your opinions and requirements then you should discuss this with your Support Worker. Anyone acting as an advocate will be asked to only meet with your Support Worker while you are present so they can be involved in the support planning process.  I **agree** that the following information may be shared with--------------------------------------------- by any relevant member of The Whitechapel Staff team:   * Information provided in my assessment 🞏 * Information about my current physical and mental health 🞏 * Information about my whereabouts 🞏 * Information about my current support needs and the plan   which is in place to meet these needs 🞏  I **understand** that I may withdraw my consent to share information at any time.  I **understand** that I have the right to restrict what information may be shared.  I **understand** that my information will be held securely on paper and computer in accordance with Whitechapel’s Confidentiality Policy however this may not be the case if shared with a third party acting on my behalf.  **I have made the following restrictions** (if applicable):  Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_/\_\_/\_\_\_\_\_\_\_  Print Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signed on behalf of The Whitechapel Centre by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Print Name \_\_\_\_\_\_\_\_\_\_  **In order to alter your consent, please inform your support worker.** |