

Bede House Association Privacy Policy

Privacy Policy

This is the privacy policy for Bede House Association. We are a registered charity (number 303199) and a company limited by guarantee (number 420386) registered in the United Kingdom. Our registered office is Bede House, 351 Southwark Park Road, London SE16 2JW.

We are a “data controller” for the purposes of the General Data Protection Regulation (GDPR) and the Data Protection Act 1988. We are required under data protection legislation to notify you of the information in this Privacy Policy, which explains how we hold and use any personal information we collect about you.

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We are a local charity working mostly in the London Borough of Southwark providing a number of different social and community services to benefit people in need. Because of the nature of our work, which includes providing services for vulnerable adults and children, we are required to hold sensitive personal information. We also have to explain the work that we do to funders and supporters upon whom we rely for financial support. We will use the information we hold about those who use our services and facilities, our staff and volunteers, and our funders and supporters in compliance with UK law and consistent with the relationship of trust we have with them.

1. Purpose of the policy

- 1.1 This policy sets out how we will collect, process, store and use the information we hold about you.
- 1.2 We take seriously the protection of your privacy and confidentiality and we understand that you are entitled to know that your personal data will not be used for any unintended purpose and will not accidentally fall into the hands of a third party.
- 1.3 We undertake to preserve the confidentiality of all information you provide to us.
- 1.4 Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
- 1.5 The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. This information can be found at www.knowyourprivacyrights.org
- 1.6 Except as set out below, we do not share, or sell, or disclose to a third party any personal information we collect.

2. Where we collect information about you from.

We collect information in the following ways:

- 2.1 When you give it to us DIRECTLY, for example when you apply for a job or to volunteer with Bede, register to access our services or to sign up to one of our events or activities, make a donation, or get in touch with us. We also collect information about the services you use and how you use them, including when you visit our website, or view and interact with our content

- 2.2 When you give it to us INDIRECTLY, for example when you use fundraising sites like Just Giving or Virgin Money Giving. These independent third parties will only share your information with us when you have indicated that you wish to support Bede House Association and with your consent. You should check their privacy policy when you provide your information to understand fully how they will process your data.
- 2.3 When you give permission to OTHER ORGANISATIONS to share or it is available publicly. We may combine information you provide to us with information available from external sources. We may use this information to gain a better understanding of our supporters to improve our fundraising methods, products and services. The information we get from other organisations may depend on your privacy settings, or the responses you give, so you should regularly check them. This information comes from social media, such as Facebook and Twitter, and information publicly available, such as Charity Commission, or published articles or news items.
- 2.4 When we collect it as you use our WEBSITES OR APPS. Like most websites our site collects web usage statistics using Google Analytics. The site uses “cookies” to assign a unique identity in order to gather aggregated data. You may opt out by selecting the “Do Not Track” setting in your browser.

3. The basis on which we process information about you.

- 3.1 The law requires us to determine under which of the defined bases we process different categories of your personal information, and to notify you of the basis for each category.
- 3.2 If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.
- 3.3 If the basis changes then if required by law we will notify you of the change.

4. Information we process because we have a contractual obligation with you

- 4.1 When you buy or fund a product or service from us, or supply us with goods or services, or join us as an employee, a contract is formed between you and us.
- 4.2 In order to carry out our obligations under that contract we must process the information you give us. Some of this may be personal information, including, for example, passport or bank account details.
- 4.3 We may use it in order to verify your identity for security purposes, to provide you with our services, to make or receive payments, including payroll.
- 4.4 We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.
- 4.5 Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, data will be anonymised and individuals will not be personally identifiable.
- 4.6 We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

5. Information we process with your consent

- 5.1 When you engage with one of our services, such as our learning disabilities service, our youth clubs and school holiday programmes, or our services for people experiencing domestic abuse, we will explain what personal and sensitive information we need to collect, how it will be used, and when we might need to disclose it to a third party (such as the police, health or social services) to fulfil our legal obligations and duties of care.

We will ask for your consent. If you are a child under 16 or a vulnerable adult who cannot give informed consent we will seek the consent of a parent, guardian or other authorised appropriate person. If you decide not to give your consent, our service may not be able to provide you with all the help you require and this will be discussed with you.

5.2 When you are receiving one of our services, such as our learning disabilities service, our youth clubs and school holiday programmes, or our services for people experiencing domestic abuse, we will discuss with you how we use photographs and anonymised case studies and quotes to publicise our work and inform existing and potential funders and supporters about what we achieve. This information is on our website, in print, film and social media. We will ask for your consent to use your image or experience in this way. If you decide not to give your consent this will not affect the service that you receive from us.

5.3 When you make a donation, or express an interest in our work, we will record your name and contact details and ask you if you wish to receive information from us about our work, our activities and events, including fundraising messages. We will only send this to you if you give your consent and you will be able to withdraw this consent at any time.

5.4 We work with children and vulnerable adults, so all employees and volunteers are required to complete an Enhanced DBS check and a suitable recruitment screening process. When you apply for a job or volunteer with us we will ask you to consent to our collecting personal and sensitive information, for example your passport details and references from people who know you well, so that we can fulfil our legal obligations.

6. Information we process because we have a legal obligation.

6.1 Sometimes we must process your information in order to comply with a statutory obligation. For example, we may be required to give information, including your personal information, to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order, or if we believe a child or vulnerable adult is at risk.

7. Information we collect because we have a legitimate interest.

7.1 In order to raise the funds we need to carry out our work, we research potential funders from publicly available sources, such as the Charity Commission website. We may use contracted professional fundraisers to do this and to prepare mailings on our behalf. We will remove personal details gathered in this way from our mailing lists when requested to do so.

8. How we keep your data safe and who has access.

8.1 We ensure that there are appropriate technical controls in place to protect your personal details. For example, our IT network is protected and routinely monitored and paper records are stored securely.

8.2 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.

8.3 We use external companies to collect or process personal data on our behalf. We do comprehensive 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 collect or have access to.

8.4 Our current suppliers run their operations inside the European Economic Area (EEA). If in the future we need to use suppliers outside the EEA, although they may not be subject to the 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.

8.5 In the course of our service delivery, we will sometimes share information we hold on you with other health and social care professionals, and, when there is risk to your personal safety or that of others, with the police. This is in order for us to provide you with joined-up care and support. We will only ever share your data if we have your explicit and informed consent.

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

9. How long we retain your personal data.

9.1 Except as otherwise mentioned in this privacy policy, we will keep your personal data only for as long as required by us:

9.2 To provide you with the services you have requested. This includes a record of the support you receive from us so that we can provide the best possible service should you contact us in the future

9.3 To comply with other law, including the period demanded by our tax authorities

9.4 To comply with our funding agreements which usually expect us to keep records for up to seven years

9.5 To support a claim or defence in court

10. Your right to know what we know about you, make changes or ask us to stop using your data

10.1 You have a right to ask us to stop processing your personal data and, if it is not necessary for the purpose that you provided it to us for, we will do so. Contact us on 020 7237 3881, admin@bedehouse.org if you have any concerns.

10.2 We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we may retain your details on a suppression list to help ensure we do not continue to contact you.

10.3 You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide please let us know and we will take appropriate steps to correct them.

10.4 If you want to access your information, send a description of the information you want to see and proof of your identity by post to The Data Compliance Officer, Bede House Association, 351 Southwark Park Road, London SE16 2JW. We do not accept requests by email so we can ensure that we only provide personal data to the right person.

10.5 After receiving your request, we will respond within one month and tell you whether we require any fee for providing it to you.

11. How you can complain

11.1 Please raise any issues or concerns you have with the Manager or a Senior Worker of the appropriate project or service. Normally, these discussions will be able to address your concerns.

- 11.2 If you wish to make a formal complaint, please do so in writing and address it to The Director, Bede House Association, 351 Southwark Park Road, London SE16 2JW, marking the envelope "Private and Confidential". You should include your full name, address and other contact details and as much information as you can about your complaint.
- 11.3 An appropriate member of Bede's senior management will acknowledge receipt of your written complaint and give an indication of how long it may take to investigate your concerns. Once the investigation is completed, you will receive a written response.
- 11.4 If you are dissatisfied with how we process your personal information, you have a right to complain to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

12. Changes to this policy

- 12.1 We may update this privacy policy from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.
- 12.2 If you have a question regarding our privacy policy please contact us at admin@bedehouse.org
- 12.3 Bede House Association Privacy Policy: approved May 22, 2018. ND