



CHURCHES HOUSING ACTION TEAM (MID DEVON) LTD PRIVACY NOTICE

WHO WE ARE:

Churches Housing Action Team (Mid Devon) Ltd – CHAT - is a not-for-profit organisation working with the homeless and people at risk of homelessness in the Mid Devon area. We are registered with the Information Commissioners Office (ICO).

Our Data Protection Lead Denise Henson and our CEO Alison Padfield can both be contacted via email on theoffice@chatmid.co.uk

WHAT INFORMATION WE PROCESS AND WHY:

Whatever information you give us, we will know you are trusting us with it, and we will always respect your privacy and your rights.

Personal data is information that identifies you, such as your date of birth or your address. We process personal data relating to our clients, their families, our staff, volunteers and our supporters and funders.

If you work for us or with us, as a member of staff, a volunteer or a funder we will record and process your data on the basis of the contract we have with you.

If you ask us to help you with something, we will record and use your personal data so that we can work with you. When you ask us for advice, we will tell you what information we are recording and offer a copy of this privacy notice. We will process some of your information on the basis of informed consent and your personal data related to that advice on the basis of our legitimate interest. This is so that we are able to justify and defend that advice should that be necessary.

The personal data we process will include some basic details such as names, addresses, contact details and dates of birth. It may also include special categories of data including health information, ethnicity and religion. We will always ask you if it's okay to record special categories of information, and you can say no without it affecting the services we provide for you, or the role you carry out for us.

When you use our website, we collect a type of data called cookies which tell us what you're clicking on. We use cookies to ensure that we give you the best experience on our website and if you continue to browse the website you agree to our use of cookies. The data collected is used to analyse how the website is being used and it is all anonymised.

All data we process is in accordance with the rules in the General Data Protection Regulations, and the Data Protection Act 2018. We follow statutory guidance in order to ensure that safeguarding is a primary concern for all our staff.

HOW WE USE THE INFORMATION:

If you are our client we will use your personal data to ensure that we fully understand who you are, the situation you are facing, and to plan effectively the help and support we may provide to meet your need.

After we have finished working with you we may ask for your feedback. This is completely voluntary but could help us to improve our services.

If you work with us or for us, we use your personal data to ensure that we can support you in offering services to our clients, and to allow you to perform your professional roles in a secure and safe environment.

If you are one of our supporters, we use your personal data to keep you informed about our work. We always ask your permission to hold this information and will do our best to ensure it is accurate and that your preferences are noted. We use an online database to hold this information securely.



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Where we rely on consent to process personal data about individuals we work with and provide services for, we ensure that we obtain that consent freely and in a positive manner. Anyone whose personal data is processed on the basis of consent can withdraw that consent easily and quickly.

We will need to contact our clients, our supporters and our funders for a range of reasons, but will only contact you on relevant CHAT business. We will use the contact details that you provide to us as our main source of communication.

We take all due care when sending out information, to ensure that it is only seen by the intended recipients.

WHO WILL SEE YOUR PERSONAL DATA:

We will only share your information with people who have a legal or operational reason to see it. For example, if you have asked us for advice members, of the CHAT team who are directly involved in planning, providing or supporting your case with us may access your data.

All staff personnel files are held securely by the CEO, and are only available to the CEO (or a delegated deputy) and the Chair of Trustees.

We don't sell your information to anyone and we only share what is necessary. Where possible we ask your permission before we share it (for example if we are referring you to another agency to help with your case). However, sometimes we may have to share or use some of your data without your permission. We will only do this if there is a legal basis to do so – for example if a court orders us to share it, or if we need to share information to protect someone's life in a medical emergency.

We will ask your permission before adding you to any newsletter lists, including our client information newsletter and with everything we send out we will tell you how to unsubscribe.

We make sure anyone processing data is trained appropriately.

RECEIVING INFORMATION FROM THIRD PARTIES:

Sometimes we receive information about you from someone else. For example, if your GP refers you to us because they believe we may be able to help. We may also be talking to other agencies you are working with (with your permission). When this is the case, we will only record information we believe to be true and accurate, if it is necessary to progress your case.

WHAT DATA WILL BE KEPT AND WHERE IT IS STORED:

We have secure processes in place to protect all personal information including how we keep and delete it.

We are required to keep your personal data for a period of time after we have stopped working with you, either as a client or a colleague. If you have approached us for food we will keep the files for a period of 2 years. If we have provided advice to you, we will continue to hold details about the advice we gave to you for six years (twelve years for mortgage cases). This is to ensure that we are able to justify and explain that advice in the event of a future dispute with you regarding what you were told. After this time, any records (paper or electronic) will be securely destroyed.

Any personal data that we keep about our clients and supporters is securely stored on an encrypted database, with limited access for staff and volunteers. It will not be accessed except in response to a question about what we did in that particular case. Any paper records are securely locked away when not in use.



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We will normally keep staff and volunteer personnel files for a maximum of two years after the end of employment, or six if they have been involved in advice work.

We keep an overall summary of our work and the people we have reached through our services. This information might include numbers of people we've worked with, how many sessions we held with them, the outcomes we achieved, and could include some additional categorisation such as gender, age and other special characteristics. This data is anonymised and does not allow us to identify individual clients. This helps us to design or adapt our services to address the needs of our community. Additionally so that we can train and support our staff in the areas most needed.

If we share information with other agencies around safeguarding concerns, they will keep a record of that information. We will keep our copies of that information with the case files, after which point it will be securely destroyed in line with our data policies.

CCTV:

CHAT have CCTV cameras in their office and situated both inside other areas and outside the building. Signs are in place to let you know where they are. We have CCTV to help us all feel safe and to assist with investigation of any serious incidents such as accusations against a member of staff. We will only share these images when we are required to do so by law. For example, we may be asked to provide footage to assist the police where there is criminal damage or other such investigations. Footage is kept for 30 days.

Seeing the information we hold about you:

If you wish to receive a copy of your personal information or ask us to correct the information we hold about you, or to stop using your information, please contact us, write to us or email us at theoffice@chatmid.co.uk.

Since the contact we have with supporters is based on consent, you can withdraw that consent at any time. If you do, then we will delete the majority of the data we hold about you, retaining only the minimum information we need for our records and for our internal administration (HMRC, Gift Aid, etc)

Clients can also withdraw that consent at any time and if you do, then we will delete the data we hold about you where we do not have legitimate interest to ensure that we can justify any advice given or steps taken in the event of a dispute.

COMPLAINTS:

If you are unhappy with how we are processing your information, please contact us using the details outlined above. If you are still unhappy after receiving our response, you can raise your concern with the [Information Commissioner's Office](#).
ICO Helpline: 0303 123 1113

Customer Contact
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, SK9 5AF

You can view CHAT's Information Commissioner's Office (ICO) details here
<https://ico.org.uk/ESDWebPages/Entry/Z545002Xy>

More information about data protection and our complaints process is available in the policy section of our website
www.chatmid.org/policies