



## Barons Court Project Privacy Policy

### **Privacy and Data Retention Policy – Staff and Volunteers**

#### **Introduction**

Barons Court Project is a charity based in the London Borough of Hammersmith and Fulham that works with people who are homeless and/or living with mental health issues or in need of support. We serve on average 200 individuals each year through our programmes of support. We have approximately 4,500 visits to the project by Service Users who are able to access a range of practical services and activities. These are designed to meet basic needs, provide support, increase skills, reduce social isolation and promote wellbeing.

We are also an organisation that seeks to change attitudes towards the groups of people we serve and campaign for their rights.

The small staff team rely on volunteers to join with us to deliver the programmes and meet our objectives. As an organisation that seeks to enhance learning and development we also take students and interns from time to time to work alongside us.

The Project has a wider responsibility to the local community and as such promotes its work to them.

#### **Data Collection**

In order to function and run our services we need to collect, process and retain a range of data. This is to ensure that we have data to look after your welfare, ensure yours and everyone else's safety, know who to contact in an emergency etc. As a publicly funded service we are required to collect and process certain data and be able to evidence this, not limited to but may include DBS Information, Qualifications, Training Records etc. The data we ask you to provide is obligatory, if you wish to work or volunteer at our service and by applying for employment or a volunteering position you are giving consent for us to process and retain data on you.

#### **At Recruitment**

The sort of data we collect in the recruitment process is normally demographic such as name, date of birth, gender, ethnic origin, sexuality etc. to ensure we are compliant with Equal Opportunities. We also might ask for Qualifications, Training Records and Experience. Please note that the data we ask you to provide for Equal Opportunities is not held with other data and cannot be traced back to an individual.

## **In Post - Staff**

If you are employed with us we will process and retain the following data:

Name, Address and Contact Details

Your Next of Kin's Name, Address and contact Details

Application Forms

References

Evidence of Right to Work in the UK

DBS Information

Absence Records including Sickness Forms

Training Records

Supervision Notes

Appraisals

Any other relevant HR information such as File Notes, Disciplinarys, Medical Notes etc.

Bank Details

## **In Post - Volunteers**

Name, Address and Contact Details

Your Next of Kin's Name, Address and contact Details

Application Forms

References

Evidence of Right to volunteer in the UK

DBS Information

Any other relevant HR information such as File Notes, Disciplinarys, Medical Notes etc.

We are not limited to the data mentioned above but you are free to ask to see what data we hold on you, under our Subject Access Policy.

## **How we will use your data**

You data will be used to ensure that we provide you with the best support possible and ensure your safety and welfare. It will ensure that we are compliant with Equal Opportunities. For both Staff and Volunteers records will be kept to ensure that your welfare is taken care of. We will only use your Next of Kin details in an emergency. We will use it to keep in contact with you, although you can specify how and when we can contact you. We may use data to supply monitoring information to our Funders, although this is normally anonymised, but in some cases we need to name a person in a particular role. Staff are expected to give consent for their image to be used on the website. Volunteer Images will only be used with your consent which can be verbal or in writing.

## **Our Privacy Commitment**

At Barons Court Project we are committed to ensuring that we meet our legal obligations under the Data Protection Act 1998 and the General Data Protection Register 2018.

## **How we keep your data safe and who has access to it**

We ensure that appropriate technical controls are in place to protect your personal details. All electronic data will be password protected so that only the person(s) responsible for processing data has access to it.

For staff the above will include both the Director and The Financial Controller with the relevant information required to undertake their roles.

For Volunteers the Director and Project Workers will have access to your data, as they line manage you.

Paper files will be held in lockable cabinets with access being available to only those who need to have it.

We will do our utmost to keep all data accurate, timely and secure and will only use data in ways relevant to carrying out the legitimate purposes and functions of Barons Court Project in a way that is not prejudicial to the interests of individuals. Barons Court Project will seek to give individuals as much choice as it is possible and reasonable over what data is held and how it is used.

Anyone processing personal data will comply with the eight enforceable principles of good practice following the procedures set in place by Barons Court Project. According to the principles of data protection outlined in the Data Protection Act 1998, data must be:

- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- not kept longer than necessary
- processed in accordance with the data subject's rights
- secure
- not transferred to countries outside the European Union without adequate protection

We will NOT rent or sell your personal information to other organisations for use by them in any way, including in their own direct marketing activities. We may disclose personal information to third parties, (for staff this will include but is not limited to our payroll department, pension provider and Employee Assistance Programme) or if we are legally or contractually obliged to do so. This includes exchanging information with other organisations for the purposes of monitoring. We may also pass on data without your consent to third parties for the following reasons:

- Significant Risk to Self
- Risk to anyone else
- Where a crime has or is about to be committed
- Where we are required to by law

The above may include but is not limited to issues such as Safeguarding and Abuse, Suicidal Ideation, Medical Emergencies and Criminal Offences.

## **How we will keep your information up to date**

All staff and volunteers are expected to keep the Project updated with their relevant information.

Barons Court Project will only hold relevant data on staff or volunteers destroying anything that is out of date.

This updated information may come directly from you to us at Barons Court Project or it may come from a trusted third party (e.g. Payroll Bureau, Pension Provider, Employee Assistance Programme) where you have had a clear expectation that your details would be passed on to us for this purpose. It may also come without your knowledge from agencies such as the police.

We may also combine the information that you provide us with information we collect from trusted third parties, business partners or sub-contractors.

## **Data Retention**

Barons Court Project always has your best interests at heart, and your personal information will not be retained by us for longer than is necessary in relation to the purposes for which it was originally collected, or for which it was further processed, always in line with our legal obligations, contractual obligations and compliance with our insurers.

## **Your rights**

You can request access to any information which we hold about you under our Secure Access Policy and we will ensure this is made available to you within the relevant time frames. The exemption to this is where we have received sensitive information about an individual that we may need to keep confidential. This may be but not limited to information from the Police, Probation etc.

## **Updating this policy**

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

Barons Court Project Data Protection Officer is the Director of Barons Court Project. The Board of Trustees recognizes its overall responsibility for ensuring that Barons Court Project complies with its legal obligations.

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