

Data protection Policy

1. About this policy

Severn Angels Housing & Support provides accommodation and support to homeless and vulnerable people in the West Midlands and Worcestershire areas from the age of 16 and over to enable them to be more independent.

As part of our work, we collect and process personal data about the people who interact with us. The kind of data we collect depends on how people use our services, whether that's getting advice, supporting our campaigns, making donations, booking on training courses or volunteering.

We only collect the minimum information we need to offer our services and do our work. We are completely committed to protecting your data and privacy, and pride ourselves on taking great care to ensure it stays completely safe.

We promise we'll never share or sell your personal data to a third-party organisation for marketing, fundraising or campaigning purposes.

This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

References to 'we' or 'us' are to:

- Severn Angels housing & Support registered address,
Restdale House, 32/33 Foregate street, Worcester, WR1 1EE

We regularly check this notice to make sure we're giving you with the most up-to-date information available about how we're processing our data. We recommend you re-read this page from



time to time to make sure you're happy with any changes that might be made.

While we've tried to make our privacy policy as comprehensive as possible, it doesn't include an exhaustive list of every aspect of how we collect and use of personal information. If you need any further information or explanation though, we're happy to help.

If you have any questions about this policy, please contact us using the details in the 'Contact us' section below.

This privacy policy was last updated in July 2020.

2. Why we collect your data

We collect and process personal data about the people who interact with us. The kind of data we collect depends on someone's needs, and how they're using our services. For instance, we might collect data to communicate with someone and send requested information to them, to help us administer campaigns and donations, or to improve our services.

We collect the minimum data required to provide our services and do our work. We're completely committed to protecting your data and privacy, and we pride ourselves on taking great care to ensure it stays completely safe.

Some of the reasons we might collect your data include:

- to provide you with advice, support or legal services that you have requested or been referred to
- to record personal details shared during conversations with our teams.
- to process personal details required for the administration of your booked training course
- to process a purchase of a Severn Angels Housing & Support publication
- to record and contact you regarding payments you make to Seven Angels Housing & Support



- to administer services Severn Angels Housing & Support is providing to you
- to communicate with you regarding Severn Angels Housing & Support work, fundraising, and campaigning activities
- to process donations and administer Gift Aid information for any donation you make to Severn Angels Housing & Support
- to administer and send you information about our legacy programme
- for our own internal administrative purposes, and to keep a record of your relationship with us
- to manage your communication preferences
- to process job applications or volunteer placements
- to conduct surveys, research and gather feedback
- to obtain information to improve Severn Angels Housing & Support's services and user experiences
- to address and resolve complaints about Severn Angels Housing & Support and our services
- to carry out research to find out more information about our supporters' and prospective supporters' backgrounds and interests
- to comply with applicable laws and regulations, and requests from statutory agencies
- to comply with our contractual obligations to our funders

3. Information we collect

Depending on how you use our services, the types of information we collect from you might include:

-your full name and date of birth

-contact details – including your postal address, telephone number(s), and email address

- National Insurance number

- details of your case when providing you with housing and support services
- your bank details
- records of your correspondence and engagement with us
- donation history and Gift Aid details
- information you may enter on the Severn Angels Housing & Support website
- photographs, video or audio recordings
- occupation
- biographical information
- other information you share with us

This information may be collected via:

- any paper forms you complete
- telephone, webchat or email conversations, or face-to-face interactions
- digital forms completed via our website, or online surveys
- third-party companies and websites such as Just Giving
- publicly available sources
- communication via social media

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. For example, we may make a record that a person is in a vulnerable circumstance to comply with requirements under charity law and the Code of Fundraising Practice, to ensure that we do not send fundraising communications to them.

Where we are providing you with advice or support services, we may record your sensitive personal data if this is necessary for the

establishment, exercise or defence of legal claims, or if it is in the substantial public interest because we would not be able to provide our services without doing so.

4. Using your personal data Severn Angels Housing & Support Services

If you are receiving advice or support from us, or if someone else has referred you to us for such a service, we will need to process your data because of your specific relationship with us.

We will keep all your relevant personal information – including notes, letters, emails and information given to us about you – in a confidential record that is specific to you. We use an electronic case management system (customer relationship management system (CRM) or other electronic system, depending on the service) as well as paper records to support our advice, guidance and support provision. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your case(s). This ensures that we provide appropriate and accurate advice or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or for one of the other purposes discussed in this notice.

We may need to disclose and discuss your personal information to third party individuals or organisations if this is necessary to help resolve your issue. Examples include:

- 1) your landlord
- 2) council housing, social services and Housing Benefits teams
- 3) the DWP/Job Centre or HMRC
- 4) your GP or medical professionals
- 5) lenders and creditors
- 6) legal representatives or advisers
- 7) the court



We will discuss this with you as we go along and will only act with your express consent unless one of the other legal bases in data protection legislation applies.

When you call our national helpline for advice, your call is recorded. This is used for training purposes, quality assurance, complaint investigations, and to make further improvements to the service we provide to you. You are informed of the recording before any data collection occurs.

To ensure that our services meet a high standard of quality, client files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors if the work we do is funded by another organisation, such as a local authority or the Legal Aid agency. All auditors are bound by confidentiality policies.

Where our funders require it as a condition of our contract with them, we may use your data in reports to them. Typically, this is so that they can monitor the outcomes of the help we have provided to you, to ensure we are meeting the terms of our contract with them.

We may use your data for general statistical reports. These statistics will not include any information that could be used to identify any individual.

Fundraising/campaigning/direct marketing

We would love to keep you up to date with our fundraising, marketing and campaign activity.

We use a range of marketing activities and channels to contact our supporters – including our website, face-to-face fundraising, direct mail, SMS/text campaigns, email, and telephone.

We will obtain your consent to contact you by email and text message for marketing purposes. We will also obtain consent from all new supporters (who signed up after 25 May 2018) to make marketing calls.

We will send you marketing by post, on the basis of it being within our legitimate interests to do so, unless you opt out. We will also contact existing supporters by phone on this basis (unless they are registered with the Telephone Preference Service or have opted out of receiving marketing communications from Severn Angels Housing & Support).

We send the following marketing materials:

- **updates about Severn Angels Housing & Support's work** – including newsletters, magazines, and other publications informing you about our work
- **campaigns** – information about our campaigning activities both in England and Scotland, including how you can support such campaigns, (for example by lobbying influential figures or signing a petition), and updates about the progress of our campaigns
- **appeals and fundraising activities** – including requests for donations, information about how you can leave us a gift in your will, how you can raise money on our behalf, attend or take part in a fundraising event, communications relating to our lottery and raffles, and updates on the impact that your fundraising activities have had on our work
- **events** – including details of our challenges, such as Vertical Rush or other sponsored runs and activities, as well as other events such as concerts and comedy gigs in aid of Severn Angels Housing & Support. Please note that if you sign up to a Severn Angels Housing & Support event, we will also send you administrative communications about how you can take part. On occasion we will also send you a reminder about the same event in future years, in case you want to participate in it again
- **volunteering** – information about how you can help support Severn Angels Housing & Support by giving up your time or using your influence to progress our aims, along with updates on the impact of your work
- **professional services** – including details of the professional services that Severn Angels Housing & Support offers, such as training and publications



We will **never** share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the 'Contact us' section below.

Any electronic communications, such as emails, will have a link to unsubscribe from future electronic communications, so you can manage your own communication preferences.

If you make any changes to your consent, we will update your record without undue delay and at the latest within one month of receipt. It may take 60 days for our systems to update and stop any postal communications from being sent to you. Email communications will, however, be stopped immediately.

Where possible, we cleanse and remove out of date by checking it against publicly available records such as deceased records. This helps us to improve the delivery rate of our mailings and minimise wasted expenditure.

Administrative communications to supporters

In addition to the fundraising and marketing communications that you receive from Severn Angels Housing & Support, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters. For example, we will call you after you have set up a Direct Debit to confirm your details, and upon cancellation. There may also be other occasions where we need to contact you about your donation – for example, if there is a problem with a payment or in relation to your gift aid declaration.

On occasion, we will also contact you about an event that you have signed up to participate in, to – for example – to check that fundraising pages have been set up and to provide any other necessary information.



As mentioned above, we may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

5. **Supporter research and analysis**

We may use profiling and database segmentation techniques to analyse your personal information, and create a profile of your interests, preferences and ability to donate. This allows us to ensure communications are relevant and timely, to provide an improved experience for our supporters. It also helps us understand the background of our supporters so that we can make appropriate requests to those who may be willing and able to donate more than they already do or leave a gift in their will. This enables us to raise funds quicker and in the most cost-effective way.

Our fundraising team uses information that is already in the public domain (information that has been published in print or online) to identify high net worth individuals who may be interested in supporting our work with a major gift. These publicly available sources of information include Companies House, the electoral register, the phone book, the Charity Commission's Register of Charities, Who's Who, LinkedIn, company annual reports, and articles in newspapers and magazines. We do not use publicly available sources which we consider would be intrusive for this purpose, such as Twitter, JustGiving, the Land Registry, online planning applications, or websites that are like these. We also carry out research to identify existing supporters who may be able to join our major donor programme. This is based both on publicly available information, and information our supporters have given us voluntarily (e.g. where a person lives, who they bank with, what their occupation is and their age).

Under data protection legislation, you have the right to object to your data being processed in this way. If you wish to opt out of being identified as a high net worth individual, please contact us on info@severnangels.co.uk



We are also legally required to carry out checks on individuals who give us large donations, to comply with our duties in respect of anti-money laundering legislation and the prevention of fraud.

Preferences, and payment details – so that we can process your **Social media/digital**

Depending on your settings or the privacy policies for social media messaging services like Facebook, Twitter, and Instagram, you may receive targeted advertisements through our use of social media audience tools. For example, Facebook's 'Custom' and 'Lookalike' Audiences' programmes enable us to display adverts to our existing supporters when they visit Facebook, or other people who have similar interests or characteristics to our supporters. We may provide your data (including your email address) to Facebook, so it can determine whether you are a registered account holder with them, or so that Facebook create a 'lookalike' audience. Our adverts may then appear when you access Facebook. We only work with social media networks that provide a facility for secure and encrypted upload of data, and immediately delete any records not matching with their own user base.

Our website also uses web beacons or pixels through third-party service providers that allow us to track conversions and activity on our website as – well as generating advertisements that appear on Facebook and other search engines, like Google, for you and other potential users.

When we're seeing what people do online like this, we're using cookies. We use cookies to tailor your browsing experience and ensure we show you more relevant information. If you don't want cookies, you can set your browser to notify you when you receive one, then choose to decline it.

Applying for a Job with Severn Angels Housing & Support

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process through the statistics

collected. Where we need to share your data – such as for gathering references, obtaining a Disclosure and Barring Services/Disclosure Scotland check (depends on the role), or a prison clearance (depends on the role) – you will be informed beforehand, unless the disclosure is required by law. These checks are only done after a position has been offered only to the successful candidate. On the application form, you are asked to complete the referee details, and can tick permission to contact referee. If tick yes, once offered a role, we will automatically send out reference requests. If you tick no, we will contact successful candidates for permission first.

Personal data about unsuccessful applicants are held for 6 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it. If we feel there is another suitable vacancy available, we will contact the applicant prior to sharing your application details with the relevant manager.

Once you have taken up employment with Severn Angels Housing & Support, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

6. Professional contacts

We may collect data about professional contacts and partners with whom we work, or to whom we provide professional services – such as training or publications. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

We may send our professional partners information and updates about our work (primarily by email). Such contacts can opt out of receiving this information at any time.

We maintain a record of information related to MPs and other holders of public office, to enable us to undertake our campaigning activity in furtherance of our charitable aims. This will include keeping a record of contact details such as address, telephone number and email address as well as publicly available voting records and committee and group memberships.

7. Our legal basis for processing personal data

We need a lawful basis to collect and use your personal data under data protection law. The law allows the below ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that we carry out. This includes information that is processed on the basis of:

- a person's consent (for example, to send you direct marketing by email or SMS)
- a contractual relationship (for example, to provide you with goods or services that you have purchased from us)
- processing that is necessary for compliance with a legal obligation (for example to process a Gift Aid declaration, and carrying out due diligence on large donations)
- Severn Angels Housing & Support's legitimate interests (please see below for more information)
- Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.
- When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Our legitimate interests include:
 - Charity Governance: including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes.

-Administration and operational management: including responding to solicited enquires, providing information and Severn Angels Housing & Support services, research, events management, the administration of volunteers and employment, and recruitment requirements

-Fundraising and Campaigning: including administering campaigns and donations, and sending direct marketing by post (and in some cases making marketing calls), sending thank you letters, analysis, targeting and segmentation to develop communication strategies, and maintaining communication suppressions

If you would like more information on our uses of legitimate interests, or to change our use of your personal data in this manner, please get in touch with us on info@severnangeshousingandsupport.co.uk

8. Disclosure of your personal data

We will not share any of your personal data with any third party – except where:

1)the transfer is to a secure data processor, which carries out data processing operations on our behalf (please see section 13 for more information)

2)we are required to do so by law, for example to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation

3)we are required to do so because it is a condition of our funding or service provision that we share certain information with the funder or with partnership organisations. We will tell you if this is the case.

it is necessary to protect the vital interests of an individual

4)we have obtained your consent

We will **never** share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

9. Security of your personal data

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We encourage you to review the privacy statements of websites so that you can understand how collect, use and share your information. We are not responsible for the privacy statements, security, or other content on sites outside of the website.

10. Transfers of data outside of the European Economic Area

We use Microsoft Office 365 which is a multi-tenant cloud services, for our internal office use. This means that internal documents and information generated by us are stored in cloud services hosted within the European Economic Area (EEA).

11. Retention of your data

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc., or any contractual obligation we might have – such as with government contracts or if we have a business case, such as with research data. For business case data, we will anonymise the data so no individual is identifiable.

Subject to the above, we will typically store data relating to donors and people who have taken campaign actions for eight years after their last donation or interaction, and people to whom we provide

services to for eight years after completion of those services. Personal data about unsuccessful applicants are held for six months after the recruitment exercise is complete for that vacancy.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted, or anonymised.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

12. **Your rights**

You have many rights under data protection legislation. These include:

-Right of Access

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to two calendar months. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by:

1. emailing info@severnangelshousingandsupport.co.uk
2. writing to the Data Protection Manager, c/o Shelter, PO Box 1477, Sheffield, South Yorkshire, S1 4YQ

- o Right to be informed

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

- Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us on

info@severnangelshousingandsupport.co.uk

- Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us on

info@severnangelshousingandsupport.co.uk

- Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

- Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

- Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

- Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

13. **Complaints**

If you have any complaints about the way in which we have used your data, please email info@severnangelshousingandsupport.co.uk or call us on the below number. We would be happy to help and discuss your concerns.

You are also entitled to make a complaint to the [Information Commissioner's Office](#) and the [Fundraising Regulator](#), and, where you have been helped by a solicitor, the [Legal Ombudsman](#). You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

14. **Contact Us**

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in section 12 above, you can get in touch with us in the following ways:

Email us on

info@severnangelshousingandsupport.co.uk



or call us on 01905347044

You can also write to us using the below address

Rest dale House

32/33 foregate street WR1 1EE