

**Data Protection and Privacy Notice**

This Data Protection Privacy Notice applies to personal information we, Filwood Hope, collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, contact us by;

Writing to: Filwood Hope, 11-13 Filwood Broadway, Bristol BS4 1JL

Phoning: [0117 963 4566](https://www.google.com/search?q=filwood+hope+advice+centre&oq=Filwood+Hope+Adv&aqs=chrome.0.35i39j69i57.3088j0j7&sourceid=chrome&ie=UTF-8)

Emailing: [advice@filwoodhope.org](mailto:advice@filwoodhope.org)

**or dropping into our centre located at** 11-13 Filwood Broadway, Bristol BS4 1JL and talking to a member of staff.

**1. Personal Data that We Process**

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

|  |  |  |
| --- | --- | --- |
| **Purpose** | **Data (key elements)** | **Basis** |
| **General** | | |
| A. Responding to enquiries about Filwood Hope and the service it provides, including enquiries from clients requesting help. | Name, contact details, message | *Legitimate* *Interest –* it is necessary for Filwood Hope to read and store the message so that we can respond to the enquirer in the way that they would expect. |
| B. Sharing data with appropriate legal or safeguarding bodies, when serious risk to life to client or another is present, or another is at risk of harm. | All appropriate data already held on the individual | Where consent is not given, the legal basis is *Legitimate Interest* and, in cases of risk to life or special category data, *Vital Interest.* When there is serious risk of harm to another, or immanent risk of life to client, we are obliged to share data with (and may receive personal data from) appropriate safeguarding bodies, whether or not consent to share information is given. |
| C. Responding to a claim made against Filwood Hope, for example to resolve a complaint that we gave the wrong advice or unfairly dismissed an employee | All data relevant to the claim | *Legitimate Interest* – in order to respond to the claim, it is likely necessary for Filwood Hope to share personal data with (and receive personal data from) the organisation handling the complaint (e.g. ombudsmen, court of law). It is reasonable a claimant would expect this to happen. |
| D. Responding to a legal obligation to share data, for example when ordered to by court | All data requested | *Legal Obligation* – in rare circumstances we may be legally obliged to share, and receive, personal data with, for example, the police or a court. |
| **Client Data** | | |
| E. Providing help to clients of Filwood Hope, including; booking in appointments, referrals to external organisations, obtaining an internal second opinion on advice to give, updating workers within Filwood Hope on clients, monitoring and reviewing the quality and outcome of help provided. | Name, contact details, National Insurance number, date of birth, client messages, client paperwork, details of client issue including special category data where necessary to providing help, written summary of client interaction and work done on behalf of the client, feedback | *Legitimate Interest* – it is necessary for us to record client case details for current and potential future work and advice review, and, at times, share client data with co-workers or volunteers. The includes personal data needed to discern the client from other clients.  *Consent* (relating to special category data and personal data shared with other organisations, such as that for the Lord Mayors Vouchers list, or foodbanks). – To facilitate referrals or obtain grants from external agencies for an individual client, is it often necessary for Filwood Hope to share data. |
| F. ‘Signing in’ clients for external agency drop-ins | Client name and purpose of visit | *Legitimate Interest* – it is necessary to temporarily store these details to ensure the smooth running of the drop-in |
| G. Collecting feedback | Stated feedback | *Consent* – feedback enables us to continually improve our service and promote our service. We may share this data with funders or as publicity for our service. |
| H. Collecting data for statistical purposes only | Special category data (racial or ethnic origin, religious beliefs, sexual orientation, health)  age group, gender, experience of Filwood Hope. | *Consent (special category data); Legitimate Interest (age group, gender, experience of Filwood Hope)* – these details are needed to provide (anonymised) statistical analysis both as required by our funders, and to enable identification of take-up of our services. This data will be recorded with your other personal data, but will be extracted to provide anonymised statistical data. |
| I. Contacting prospective clients referred into Filwood Hope by external agencies | As provided by the referring agency, but likely to include prospective client’s name, contact details, and details of relevant issue. | *Legitimate Interest –* it is necessary for us to record and use these details in order for us to contact the prospective client and provide appropriate support, as per the expectation of the prospective client and referring organisation. |
| **Staff, Volunteer and Trustee Data** | | |
| J. Providing pay, including sick pay and pensions contributions, to staff | Staff name, address, bank details, national insurance number, details of private pension where applicable, medical information | *Contract* (including Special Category Data, as Article 9b of the GDPR applies, and Schedule 1 of the DPA 2018 paragraph 1, 39 and 40 applies) – this information is necessary for Filwood Hope to fulfil its contractual obligation of paying employees. This information would be shared with our auditor (an external data processer). |
| K. Verifying appropriateness for role | Original DBS, to be copied (staff only),  personal and past-employer references, work history, criminal offence data (staff only) | Regarding work history and qualifications: *Legitimate Interest* – Filwood Hope requires independent verification of ability and appropriateness of an individual to fulfil their role within the organisation. To obtain this, Filwood Hope may share basic personal details with, and receive personal data from, ex-employers and educational bodies.  Regarding DBS/Criminal Offence Data: *Legal Obligation* – as staff may work one-on-one with vulnerable adults. To obtain the relevant information, Filwood Hope may need to share relevant personal data with the Disclosure Barring Service. Personal data would then be received from this service. |
| L. Emergency contact | Next of Kin contact details | *Consent* – this information would allow us to contact next of kin in an emergency and, where appropriate, share relevant personal data. |
| M. Contacting staff/volunteers/trustees | Contact details | *Legitimate Interest –* this information is necessary for the day-to-day running 0f the service, for example contacting to arrange rota, provide documents, ensuring wellbeing |
| N. Monitoring performance | Details of work done, reviews, disciplinaries | *Legitimate Interest* – performance information must be available for monitoring and review to ensure a high quality of service from Filwood Hope is maintained |
| O. Providing References | Name, job role, information on performance in role, dates of employment | *Consent* – this information may be requested by future employers, or similar, to enable them to determine an individual’s appropriateness for a role in their organisation. Personal data would be received from the organisation requesting a reference. |
| P. Providing required information to Companies House (Director, Company Secretary and Trustees only) | Company Secretary name and, if agreed with Secretary, home address  Director name, nationality, date of birth, home address, occupation  Trustee name, nationality, date of birth, home address, occupation, details of how they control the company | *Legal Obligation* – Filwood Hope is legally obliged to Register with the Companies House, and provide the requested information. |
| Q. Collecting data for statistical purposes only | Special category data (racial or ethnic origin, religious beliefs, sexual orientation, health)  age group, gender, experience of Filwood Hope. | *Consent (special category); Legitimate Interest (age group, gender, experience of Filwood Hope)* – these details are needed to provide (anonymised) statistical analysis both as required by our funders, and to enable identification of take-up of our services. This data will be recorded non-anonymously, but will be extracted to provide anonymised statistical data. |
| **External Contacts’ Data** | | |
| R. Maintaining effective work relationships with external agencies | Name, contact details, place of work | *Legitimate Interest* – recording named workers from other organisations is necessary for Filwood Hope to enable appropriate client referrals, signposting and applications; the smooth running of external agency drop-ins; and information sharing between agencies. In all, this ensures a high quality and well-informed service from Filwood Hope, and that Filwood Hope is able to serve as broadly as possible as many clients as possible. Personal data may be received from external agencies in relation to their workers. |
| S. Receiving a donation | Name, contact details, charity/organisation association if relevant, payment information | *Legitimate Interest –* this information is necessary for Filwood Hope to fulfil the donor’s intention of donating money and their expectation of receiving a confirmation message. |
| T. Recruitment | Application forms and interview notes containing name, contact details, work history, health conditions i.e. if adaptions are needed for interview | *Legitimate* *Interest* – this information is necessary for Filwood Hope to fulfil the applicant’s intention of applying for a role, being evaluated for it, and being contacted in relation to it.  *Consent –* (for special category data) – the applicant may choose to disclose health-condition related adaptions required for them to access the interview or application process |

**2. How We Use Your Data**

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

* reply to enquiries you send to us
* handle donations that you initiate
* refer you, with your explicit consent, to a specialist agency to assist with your enquiry

**3. When We Share Your Data**

We will only share your data outside of Filwood Hope in the following circumstances:

* when you have provided your explicit consent for us to pass data to a named third party
* when there is immanent and serious risk to life you or another
* when another is at serious risk of harm or abuse
* when you have legitimate interest in having this data shared but lack the mental capacity to consent, according to the mental capacity act
* when we are required to do so by law
* to defend the legal right of Filwood Hope
* as necessitated by contractual obligation in order to pay you
* to ensure your appropriateness for a role within Filwood Hope by obtaining references and a criminal background check
* we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors.

**4.** **How Long We Keep Your Data**

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

All personal data is deleted after a maximum of 7.5 years from our last interaction with you.

**5. Rights You Have Over Your Data**

You have a range of rights over your data, which include the following:

* Where data processing is based on consent, you have the right to revoke this consent at any time and we will make it as easy as possible for you to do this.
* You have the right to ask for rectification, restriction and/or deletion of your information.
* You have the right of access to your information.
* You have the right, in some cases, to object to the processing of your data.
* You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner’s website; www.[ico.org.uk](https://ico.org.uk/)

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us using the details at the top of this document.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

**6. Cookies and Usage Tracking**

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

We use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at [www.google.com/privacypolicy.html](http://www.google.com/privacypolicy.html).

**7. Complaints**

You are welcome to make an informal or formal complaint to Filwood Hope about any access of our service. To learn more, ask a member of staff or view our Complaints Notice available on our website and our waiting room notice board. Additionally, you have the right to lodge a complaint with a supervisory authority such as an appropriate ombudsmen or the Information Commissioner’s Office (ICO).

**8. Modifications**

We may modify this Data Protection and Privacy Notice from time to time and will publish the most current version on our website and on our waiting room noticeboard. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.