

Current and Former Clients' Privacy and Data Protection Policy

Reviewed: February 2025
Next Review date: February 2026
Approved by CEO & Board Trustees

The Matthew Project ("TMP") is committed to protecting the privacy of our current and former clients; being transparent, accountable, and respectful of their personal information.

Policy Aims

The Current and Former Clients Data Protection and Privacy Policy (the "Policy") aims to:

- Inform current and former clients how TMP collects, uses, shares, and looks after their personal data.
- Describe why and how TMP collects and uses personal information during and after the client's connection with TMP.
- Set out TMP's data processing practices and the rights of current and former clients and options regarding the ways in which their personal information is collected and used.

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Who we are

TMP is a registered charity that supports people across Norfolk, Suffolk, Essex and Cambridgeshire. The organisation empowers young people and adults to overcome problems with drugs, alcohol, and mental health. We pride ourselves on being inclusive and believe we provide real opportunities to all.

To enable us to carry out that work, TMP may need to use your personal information. When we do, we are the processor of that information. We have a duty of care and an obligation under data privacy law relating to how we use your personal information.

Data Protection Principles

- 1) **Lawfulness, fairness and transparency** - We want to be clear, open and honest from the start about who we are, and how and why we use your personal data.
- 2) **Purpose limitation** - Personal data is collected only for valid purposes that are clearly explained to you and not used in any other way.
- 3) **Data minimisation** - We will only hold adequate and relevant information on you that is sufficient for fulfilling its purpose.
- 4) **Accuracy** - We will take reasonable steps to ensure the accuracy of any personal data in the form of periodical checks.
- 5) **Storage limitation** - We will only hold personal data for as long as we need it.
- 6) **Integrity and confidentiality (security)** - We have appropriate security measures in place to protect your personal data. This includes, and is not limited to, two-step authentication, different levels of security roles, cyber security, organisational policies, physical and technical measures.
- 7) **Accountability** - We have policies and procedures in place, regular staff training and we keep a general record of processing.

Personal data we collect

Personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed and anonymised. We will clearly ask for your consent for us to keep your personal data. We may get this personal data from you directly, from a family member, a referrer or another third-party associated to you.

We may collect, store and use the following personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Date of birth.
- Equality, Diversity and Inclusion questions (special category data, including gender, sexuality, ethnicity). These questions are voluntary and are there to help us monitor equality across our organisation.
- Photo/Video recording – This can be at an activity or an event. We have a sign-in process at our Oak Street Centre that gives the option to capture a photo when visitors sign-in and we have CCTV throughout the premise to monitor health and safety for all those that access our site.
- We may keep details of TMP activities and events you have attended.
- Emergency contact details and next of Kin, health and medical conditions, dietary information and allergies.
- Communication, engagement and your journey from start to end.
- For adults we may collect; employment status and information including previous and/or existing employers, courses or extra training taken, copies of certificates gained.
- For children we may collect; school year group, school attendance, EHCP (if applicable), Key worker contact information and ongoing communication with such professionals.

Why we collect it

We strive to build a good relationship with each of our clients; we want you to feel connected with The Matthew Project, to feel valued, to have an excellent experience and to evidence your journey whilst you are accessing our service. Keeping our clients safe when working with them is our priority so we will collect information for safeguarding, health and safety purposes, making sure we have the right information to process and/or to pass on. We collect this data also to help us to report to funders and commissioners, making sure we are meeting set targets and to help us secure more funding to enable us to continue to deliver our service.

How we use it

TMP will only use your personal data as detailed in the table below. We will keep personal data confidential and will not disclose it to any third party without your consent, unless we are obliged to do so by law, or it is necessary to process information on your behalf.

We consider the grounds listed below to be relevant:

How we use your personal data	Grounds for using your personal data
To provide you with services, products or information you have requested	Consent Legitimate interests
Safeguarding and monitoring risks	Vital Interests
Reporting to commissioners and funders – Ensuring we are meeting targets	Consent Legitimate interests
Update NCC with up-to-date data and education information on young people aged up to and including 18 years of age, who are recorded as not in education, employment or training or are at risk of.	Legal obligation
Update lead partners with up-to-date data where a signed Information Sharing Agreement is in place.	Consent Legal Obligation
Report back to referrers of your current engagement levels with us	Legitimate interests
Maintaining databases of clients	Consent Legitimate interests
To record and administer our client's journey, including one-to-one engagement and activities	Consent Legitimate interests
Recording communication between professional and client. This can include texts, phone calls, emails and verbal.	Consent Legitimate interests
Follow-up and/or Feedback – TMP may contact you up to three years after you leave our service	Consent Legitimate interests
Helping us monitor your ongoing consent for information.	Legitimate interests
Photos and videos taken for media and social platforms	Consent
For security monitoring (reporting incidents to the police and providing evidence), and health and safety (building evacuation)	Legitimate interests Legal obligation

Sign-in data of visitors to The Hub, including photo images	Legitimate interests Consent Vital interests
CCTV monitoring and recording	Legitimate interests
To provide a service (e.g. training, catering)	Legitimate interests Consent

Please note that we may process your personal data without your knowledge or consent in compliance with the above “Grounds for using your personal data”, where this is required or permitted by law.

Removing Consent

We will only use your personal data for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Data Security - Who has access to it

Your personal data, collected by TMP, will be held securely either on paper and/or electronically.

TMP uses reasonable measures to safeguard any personally identifiable information. We have put in place appropriate security measures to prevent the personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to the personal data to only those staff who have a legitimate business need to have access to that data.

Due to the nature of servers and cloud-based storage all over the world, this may mean that, during the processing of data, it leaves the European Economic Area (EEA). Although they may not be subject to the same data protection laws as in the UK, we will take steps to ensure they provide an adequate level of protection in accordance with UK data protection law. By submitting personal data, you are agreeing to this potential transfer, storing, or processing at a location outside the EEA.

Data Retention - How long we keep it

We will hold personal data no longer than is necessary and in accordance with the law. At regular intervals, we will:

- Review the length of time we keep personal data for.
- Consider the purpose or purposes for which we hold personal data for in deciding whether (and for how long) to retain it.
- Securely delete information that is no longer needed for that purpose or those purposes.
- Update, archive or securely delete information if it goes out of date.

All records will be disposed of in a secure manner. Paper records will be disposed of by way of confidential waste and electronic records will be irretrievably deleted.

Retention Schedule		
Type of data	Length of time	Reference
Unity and YouCan clients (17 and under)	Under 17 when treatment concludes – retain until 25 th or 26 th birthday (or 8 years after death).	Retention of health records (bma.org.uk)
On Track - Funding supplied from National Lottery through the Community Fund and European Social Fund BBO Programme.	Records are kept until 31 st March 2034.	[Withdrawn] European Structural and Investment Funds document retention - GOV.UK (www.gov.uk)
All other clients	Under 17 when they left the service - retain until 25th birthday. Up to 18 when they left the service - retain until 26th birthday. Over 18 years old when they left the service - retain for 7 years.	
Referral details that do not result in individual joining a TMP service	3 months.	
Sign-in data of visitors to The Hub, including photo images	Retained for up to 30 days	
CCTV recordings	Retained for as long as capacity allows before overwriting, generally this is 20-30 days, unless there is a compelling reason to retain further, e.g. as evidence for an incident - until the resolution of the incident.	

Images

Anyone who engages with our services, events and activities may have images taken of them whilst participating. When we take images, we will always advise you of this and give you an opportunity to opt out. We may use these photos in our marketing materials.

We will only publish these photos with your consent. If you do not wish your photo to be used, you can contact us and withdraw your consent at any time. On the rare occasion we may want to publish photos of children up to (including) 12 years of age, participating in activities. We will only do this once we have parental consent.

CCTV Monitoring at The Next Steps Centre (70-80 Oak Street, Norwich, NR3 3AQ)

TMP's CCTV system is a Network Video Recorder which is managed by TMP and has appropriate security in place to ensure this information is only shared with those who need access to it. CCTV footage will be:

- stored on-site in our server room (not backed up); and
- stored for as long as capacity allows before overwriting - generally this is 20-30 days.

There are no legal requirements in the UK regarding the retention of CCTV footage. However, in accordance with Police recommendations, we will ordinarily keep CCTV footage for no longer than 31 days, unless there is a compelling reason to retain it further. This data is kept according to our Data Retention Schedule.

Reception Sign-in

If you visit our Next Steps Centre, there is an electronic sign-in system. It collects your name, your vehicle registration (if applicable), details of who you are visiting, details of any assistance required in case of evacuation and your picture (optional for this data to be stored).

We are responsible for this information; it is stored on a cloud, and we have appropriate security in place to ensure this information is only shared with those who need access to it, by having a local network system so that only those with permission can access it on site. This data is kept according to our Data Retention Schedule.

Exercising your Rights

Under data protection law, you have rights including:

- **The right of access** - You have the right to ask us for copies of your personal data. If you want to access your data, you can do this face-to-face, by email, on the telephone or by letter. It would be helpful to know the description of the information you want to see and proof of your identity may be needed. We will respond within one month.
- **The right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **The right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.
- **The right to restrict processing** - You have the right to object to the processing of your personal data in certain circumstances.
- **The right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent.

Although you will not usually need to pay a fee to exercise your rights, TMP reserves the right to charge a fee if the request involves a long, time-consuming process.

To make a data protection rights request, please contact us by email: dataprotection@matthewproject.org or by post, at our address; 70-80 Oak Street, Norwich NR3 3AQ.

Changes to this Policy

We may update this Policy from time to time and place the updated policy on our website.

How to complain

If you have any concerns about our use of your personal data, you can contact our team on dataprotection@matthewproject.org.

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>