

The Matthew Project – Privacy Notice May 2018

Service Users, Supporters and Job and Volunteer Applicants.



Version Number 1.2

The Matthew Project (TMP) is committed to protecting your privacy being transparent, accountable and respectful of your personal information and do all we can to keep it safe.

We aim to be clear about how we obtain your details and only process them in ways we believe you would reasonably expect. This includes not selling or sharing personal details with third parties for the purposes of their marketing. There are times where sharing information is helpful and this is explained in this notice.

We always aim to communicate with you respectfully, effectively and efficiently. Our forms give clear choices and we include information on how to change your communication preferences whenever we contact you. This helps us send you news of our work only if you have explicitly stated you are happy for us to do so in ways that are most convenient to you (email, SMS, phone, post).

This privacy notice tells you what to expect when TMP collects personal information. It applies to information we collect about:

- The people who enquire about and use our services
- Supporters of the Charity and visitors to our online communications.
- Job applicants, current and former employees and volunteers
- Complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry

How we hold your private information.

All the personal data we have is stored securely in the following places:

- On a secure database in the UK.
- On an IT system that may be at one of our sites, elsewhere in the EU or overseas.
- In locked filing cabinets which only limited authorised persons can access.

People who use or enquire about our services.

TMP offers a wide variety of different services to local communities, young people, families, adults and general members of the public. We need to hold the details of the people who have requested the service so we can provide it in a safe and effective way. We use your information in order to provide for your care, we need to collect and keep information about you on our records however, we only use these details to provide the service the person has requested and for other closely related purposes. These purposes include the safeguarding of our service users and the safety of volunteers, staff and the public.

Your records are used to:

- Provide a basis for all support and care decisions made with and for you;
- Make sure your care is safe and effective;
- Work effectively with others providing you with care.

We also may use, or share, your information for the following purposes:

- Looking after the public;
- Making sure that our services can meet peoples' needs in the future;
- Auditing accounts and our databases;
- Preparing statistics on performance and activity (where steps will be taken to ensure you cannot be identified);
- Investigating concerns, complaints or legal claims;
- Helping staff to review the support and care they provide to make sure it is of the highest standards;
- Training and educating staff;
- Research with the right approval. (If the research involves you personally, you will be contacted to provide consent);
- Disclosure of Information to other health and social care professionals

We will ask service users how they would like us to stay in touch with them during their time with us. Service users can update this information on their preferred contact methods at any time.

We normally retain service user records for seven years after they finish treatment with TMP and delete their files after this.

People who Support Us - How do we collect information about you?

We collect information in the following ways:

When you give it to us **DIRECTLY** including:

- When you contact TMP to make a donation, register to receive news about our work, sign up to TMP's online content, or you telephone, email, write to or text us, engage with us via social media channels, sign up for one of our events, or order our resources online.
- When you attend a meeting or an event, fill out a questionnaire, or have a conversation with us and provide us with information about yourself.

When you give it to us **INDIRECTLY**

For example, your information may be shared with us by independent fundraising sites such as JustGiving or Virgin Money Giving when you give a gift. These organisations will only do so with your consent if you have indicated that you wish to support TMP. You should check their Privacy Policy when providing your information to understand fully how they will process your data.

When other organisations have permission to share or it is available **PUBLICLY**

In addition to the details you give us, we may seek further information about you that is publicly available from external sources. We use this to gain a better understanding of our supporters to enable us to update you about our work and how you can get involved in the most appropriate ways.

The information we get from other organisations may depend on your privacy settings or the responses and permissions you give, so you should check them regularly.

This information comes from the following sources:

Social media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, we might have permission to access information from those sources. We will not add this information to your personal details.

Other information that is available publicly

This may include information found in publicly available sources such as Companies House, LinkedIn, the Charity Commission, companies, grant-making trusts and Government websites, biographical directories and information that has been published in reputable media.

When we collect information as you use our website:

Like most websites, we may use 'cookies' to help us make our site, and the way you use it, better. Cookies are small text files that sites transfer to your device (computer, phone or tablet) and make interacting with a website faster and easier – for example, by automatically filling in your name and address in text fields.

TMP may store information about you and your activity in cookies. These help improve user experience of websites. If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies. If you wish to restrict or block web browser cookies that are set on your device, you can do this through your browser settings; the Help function within your browser should tell you how. You can also find more information at <https://www.aboutcookies.org.uk>

If you don't want to hear from us, please let us know by calling 01603 626123 or emailing enquiries@matthewproject.org

What personal information we might collect from you

If you support us — for example you make a donation, sign up to receive news of our work, volunteer, take part in an event, or order our resources — we will usually collect:

- Your name
- Your contact details, including postal address, email, telephone numbers, along with your preferences as to which of these we should use to contact you in the future
- Your date of birth
- Bank account details if you make a regular donation by direct debit or standing order
- Debit or credit card details used to donate to us or when ordering resources – this could be online, over the phone or by mail. We will process your information securely and in accordance with the Payment Card Industry Standards. Your details are only used to complete the transaction requested; we do not store your debit or credit card details. If you have provided them physically, they are securely destroyed once your donation or payment has completed
- Your Gift Aid status
- Your position within an organisation or charitable trust (if relevant)
- In some cases, we may also gather additional personal information which may include your interests in social action, substance misuse, volunteering, and your other interests.

- Other personal information or sensitive data you share with us, such as your family information, denomination, and your home church, and any appropriate health issues you may have told us about that will help us communicate with you in the most appropriate way (eg, large print).

How do we use this information?

The information we gather helps us to send you what you want when you want it, to fulfil orders for resources, and send you updates and information about our work.

It also helps us to shape our fundraising activities to ensure that our communication is relevant and timely, and provides you with a good experience of supporting TMP. Importantly, having accurate information that we can analyse enables us to tailor approaches and to be wise stewards of the resources entrusted to us, ensuring that the maximum amount possible goes to providing TMP services to our clients.

We will use your personal information to:

- Provide you with the information, resources or services you have requested
- Keep you up to date with the work you are supporting and to ask for financial and non-financial support
- Administer your donation, including processing Gift Aid
- Ensure we know how you prefer to be contacted
- Keep a record of your correspondence, donations history, questions you have asked us, or comments or complaints you have made
- Understand how we can improve your supporter experience based on your interests and interaction with us
- Understand how we can improve our services, and the resources or information we send out
- Contact you in your capacity as a representative of an organisation such as a church, school, business or charitable trust
- Ensure that potentially vulnerable people are treated appropriately, particularly with regard to financial giving and legacies
- If you make a substantial gift to our work, we may contact you to thank you and to discuss how you might want to develop your interest in our work. This would include having a discussion with you about the methods of contact most suitable for you.

We do not sell or share personal details to third parties for the purposes of their marketing.

Legal bases for processing your data:

Consent

From May 2018, we will process any new supporters' data based on the consent you have given us.

Legitimate interest for existing supporters

If you are an existing supporter, we will use your support for us over the previous three-year period as a legitimate interest reason to continue sending you the communications you receive from us.

This includes if you have made a donation or updated us with new information to help us send you

the right communications for your needs. If you have previously asked us not to contact you, we will continue to respect your wishes.

Legitimate interest for potential supporters

We may rely on legitimate interest:

- If you publicly share information about your interests and concerns that overlap with an area or activity of TMP's work
- If we identify you as a match to our work during our research to locate new supporters, through our use of publicly available information.

We would use any information we gather to help us plan an appropriate approach, such as a meeting or an event invitation, where we could share further information about TMP and explore your interest and opportunities for support.

Opting out

You can change or stop what you receive from us by following the instructions at the bottom of any postal communication or email, or you can contact us by phone at any time.

Protecting your personal information

The security of your information is very important to us. We ensure that there are appropriate controls and procedures in place to protect your personal details. For example, information you submit on a physical form or when filling out online forms is encrypted and stored on a secure server. We also use encryption and secure servers when you make a donation via our website.

We undertake regular reviews of who has access to information we hold to ensure that your details are only accessible by appropriately trained and authorised staff.

Your information may occasionally be passed to service providers that perform functions on our behalf, such as sending postal mail and email or analysing data. These companies may only use your information to perform these functions and may not use it for any other purposes. We carry out data protection and privacy compliance checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collected or to which they have access. They are required to destroy this information once the function for which it has been transferred has been carried out.

If required, we may need to disclose your details to the police, regulatory bodies or legal advisors.

Due to the nature of servers and cloud-based storage all over the world, this may mean that, during the processing of your 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 make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information, you are agreeing to this potential transfer, storing or processing at a location outside the EEA.

We will only ever share your data in other circumstances if we have your explicit, informed and unambiguous consent.

Keeping your information up to date

When possible, we use publicly available sources to keep your records up to date and accurate. We also take appropriate measures to ensure that information is only kept for as long as is necessary

and only for the purpose for which it was given. We will also only use it when regulations permit us to do so.

However, we would really appreciate it if you let us know if your contact or personal details change, as this gives us consent to use the updated information and continue to communicate with you.

How long we will keep your information for:

- We will hold your personal information on our systems for as long as is necessary to carry out the activity relevant to your interaction with us
- We will keep a record of any donations you have made for at least seven years
- Legacy gifts are vital to TMP's work. We may keep information provided by you or your solicitor indefinitely, both to administer the gifts and to communicate with the families of people leaving legacies
- If you ask us to cease communications with you, we will keep a record of your contact details and appropriate information to enable us to comply with your request.

Job and Volunteer Applicants

This Privacy Notice tells you what to expect in relation to personal information about you which is collected, handled and processed by The Matthew Project. The Matthew Project of 70 – 80 Oak street, Norwich, NR3 3AQ is the Data Controller.

The information we may collect

Information collected and processed as an applicant for employment or volunteering is as follows:

- Your name
- Your address
- Your email address
- Your telephone numbers
- CV/work history
- Roles you have applied for
- Any other work-related information you provide, for example, education or training certificates
- Names and contact details of referees (see notes below)
- Information you have provided to us in relation to DBS and any convictions (see notes below)

How we use the information

The above information is used to provide our services to you in our capacity as an employer.

The information above may be used as follows:

- To establish whether your skills, experience and knowledge are a possible match for the requirements of roles that you apply for so you can be considered for such roles

- To include you in email alerts, if you have signed up for these, for vacancies that become available.
- To enable us to contact you about your applications and invite you to interview

Disclosure of your information

Your application, CV and related information will be shared internally with the support team that administer job applications and with the managers involved in the recruitment and selection process. This information will only be shared externally if the position requires an interviewer from an organisation working with us in relation to the position.

Information about referees is retained with the support team and only used if a position is offered.

DBS and convictions information that you provide is retained confidentially by the support team. If you are shortlisted for an interview, this information is shared with the recruiting manager to assess whether you can proceed to interview. If you are invited to interview and are being considered for a job offer you will be asked to meet privately with the recruiting manager to discuss your convictions confidentially. They are required to assess this information in relation to risks to you, the team, people who use our services and to the wider organisation.

Personal data shall not be transferred to a country or territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection or the appropriate safeguards are in place for your rights and freedoms. Before such a transfer takes place outside of the EEA, we will provide you with further information concerning this. However, it is unlikely that this will ever occur.

What is the legal basis for processing the information?

We will rely on our legitimate interest to process the information above which is collected at the outset of the recruitment process. Applying for the job gives that legitimate interest because you are providing us with your personal data for that purpose. We will not use that information for unconnected communications.

Information in relation to criminal record checks, which are relevant for some roles, will be processed on the basis that it is necessary for us to comply with the law and consent will be obtained, if required.

Once a position has been offered to you, we will process your personal data, including financial information, for the purpose of you entering into a contract to fulfil your role and to enable us to pay you, depending on the specific contractual arrangements and circumstances.

Volunteers

The employment part of this Privacy Notice also applies to volunteer except for data that relates only to employment.

Your rights

You currently have the right at any time to ask for a copy of the information about you that we hold. Requesting this information is free unless the request is deemed excessive, then we may charge an administration fee for this service. In addition to this right of access you also have the following rights: erasure, restriction of processing, objection and data portability.

Retention of your data

Your data will be retained for no longer than is necessary and in accordance with our Data Retention Policy. This means for all job applicants we will remove your record after the statutory seven years; however, you can delete your own account and data record at any time via the Recruitment website.

Automated Decision Making

We do not conduct any automated decision-making or profiling.

Concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to Information Commissioners Office at <https://ico.org.uk/concerns/>.

Changes to the Privacy Notice

This Privacy Notice may be changed by us at any time. This Privacy Notice will be updated in due course to comply with the further requirements under the GDPR which comes into force on 25 May 2018.

General - Right of access

You have the right to ask for a copy of the information we hold about you. If there are any discrepancies in the details we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to The Matthew Project, 70-80 Oak Street, Norwich NR3 3AQ. We do not accept these requests by email, so we can ensure that we only provide personal information to the right person.

If you have any questions, please contact our Support Team on 01603 626123 or enquiries@matthewproject.org. For further information, see the Information Commissioner's guidance at www.ico.org.uk

General - Changes to this notice

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on the TMP website and/or by contacting you directly.

If you have any questions, comments or suggestions about this notice, please contact us at the address below:

The Chief Executive,

The Matthew Project,

70-80 Oak Street,

Norwich NR3 3AQ

Email: enquiries@matthewproject.org