

WIMBLEDON GUILD OF SOCIAL WELFARE

Privacy Notice How we use your information

1. What is the purpose of this document?

We are committed to protecting the privacy and security of your personal information, in accordance with the EU General Data Protection Regulation (GDPR) and UK's Data Protection Act 2018.

This Privacy Notice describes how Wimbledon Guild of Social Welfare (referred to as "**Wimbledon Guild**" or "**we**" or "**us**") collect and use personal information about our customers, clients, volunteers, training delegates, private room hire counsellors/psychotherapists, supporters and website visitors ("**you**").

It does not describe the personal information that we collect and use about other audience groups, including staff, prospective employees, trustees, members, third party consultants, and residential tenants, which can be obtained from our nominated Data Protection Officer (see section 11).

Additional information about how we use your data for particular activities may also be provided at the time you become involved in such activities

This Privacy Notice is also available in a format that has been tailored for anyone requiring a simpler format, including for clients who are children, for each of our main areas of activity. These shorter versions will be offered when you first apply, register or are assessed for a service or activity with us.

We may update this Privacy Notice at any time, and will always make the latest version available, via our staff and on our website. **This Notice was last updated on 25 May 2018**

2. What is covered in this Privacy Notice?

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3. Who we are and data protection principles

Wimbledon Guild is a controller under data protection law, meaning that we decide how your personal information is used and the reasons. Data protection law requires us to ensure that the personal information we hold about you is:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Adequate and relevant to the purposes we have told you about and limited to what is needed for those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

We have appointed a Data Protection Officer, who is responsible for overseeing use of personal data by Wimbledon Guild. You may contact the Data Protection Officer with any queries or concerns about our use of your personal data – refer to section 13 for contact details.

4. The kind of information we hold about you and how we use it

Personal data, or personal information, means any information about an individual who can be identified by us. It does not include data where we do not know the identity of the person to whom it relates or where we have removed information which allows identification (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

4.1 Clients and customers

"Clients" and "customers" mean the recipients of our services, including those who receive our counselling, befriending, outreach, bereavement and other welfare services, and those who attend our classes, trips, talks and emotional support groups.

In order to receive these services, determine the type of service you may require, and/or whether you are eligible or able to receive relevant services, we need to collect and use information about you.

This information will be collected from you or from another party (such as a family member or referring organisation), or otherwise created by us when you first apply, are referred, register for a service or are assessed for a service and subsequently whilst providing that service.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, address, telephone number, email address
- Date of birth, year of birth or age category. This is used for equality monitoring, to assess eligibility and determine funding streams for some services.
- Gender. This is used to assess eligibility for grants and welfare benefits, and for equality monitoring.
- Next of kin and emergency contact information. See section 4.4 below.
- Personal circumstances e.g. recently bereaved/housebound to help identify needs which you would like us to help you with
- Any key issues/concerns and action points from assessments.
- Communications exchanged with you, feedback from you in relation to delivering services and notes of meetings concerning the service provided to you.
- Organisations, individuals and services that are supporting you.
- Financial information. This is needed when we are supporting you with benefits, debt and with grants.
- Information about your home environment. This is needed for risk assessing ahead of home visits, so that we can understand if there are any access issues to consider such as parking or an entry phone, and to help us provide housing related support.
- Accommodation type. This is needed in helping assess you for a grant.
- Others in your household and dependents. This is needed in helping assess you for a grant; or in counselling to know more about important relationships, supportive relationships and to be aware of any potential safeguarding issues that may arise.
- Employment information. We ask this in counselling to establish a fee and to understand your overall life history and the stabilising aspects of your lives. We ask this if assessing you for a grant because it can help us to access restricted funds if you have an employment connection with a war effort.
- National Insurance number. This is occasionally needed by our bereavement support service to be able to make a referral to DWP's home visiting team.
- Payment method for counselling clients.
- Subject to obtaining your consent, we may hold video and audio recordings of counselling sessions.
- Dietary requirement information e.g. allergies for café customers.

If you provide us with information about another individual (such as your next of kin or emergency contact), you should ensure that this person is comfortable with us holding their data, and direct them to this Notice for more information as needed. See also section 4.4 below.

We may also collect, store and use the following "special categories" of more sensitive personal information about you, where relevant to the services we provide. This includes:

- Ethnic group. This is used for equality monitoring
- Religious group. We ask for this as part of counselling to understand the impacts of your belief system (both positive and negative). We ask this as part of the application process for our grants programme to help us assess eligibility for grants provided by other organisations.
- Sexual orientation. We ask for this as part of counselling, as part of your personal history related to your relationship background, linked to your attachments and any difficulties you may have encountered.
- Information about your health, including any medical condition, mental health illnesses or episodes or disability and your GP/GP surgery. Health information is needed to understand if you require additional support to access our services, if you require information in an alternative format, to identify areas of support required, if it would help the delivery of item(s) purchased through our grants scheme, and is needed by some external services in order to make a referral.

In the case of children seen within our family therapy service under the age of 12 or otherwise who appear to the therapist not to have capacity to consent for themselves, we will put a system in place in which we verify their age and obtain parental or guardian consent for any data processing activity. We will make reasonable efforts to verify that the person giving consent does, in fact, hold parental responsibility for the child. If a young person over the age of 12 who appears to the therapist to have the capacity to consent for themselves indicates that they do not consent to their personal data being processed for the purposes of family therapy, family therapy will not be provided to that young person and any personal data relating to them held by Wimbledon Guild for this purpose will be erased.

We are assisted in providing some of our services by volunteers, self-employed psychotherapists /counsellors and self-employed class instructors, who are not employed by us, but act on our behalf. They will share information with us which they obtain from or discuss with you.

Depending on the nature of the services, we may have to share information about you with external agencies, such as your GP, and external service providers. This is described in section 8.

The lawful bases for collecting, storing and using your data is through legitimate interests as described above for the different categories of data collected, to the extent consent is not sought.

4.2 Volunteers

Volunteers include home-visiting volunteers, counselling volunteers (including trainees), café volunteers, activity volunteers, garden volunteers, work experience students who volunteer and other volunteers who assist us with our services and events.

We need to collect and use information about you in order to check that you are suitable to work with vulnerable adults, manage our relationship with you, match you to a suitable role, understand if there are any requirements/ adjustments that will assist you in your role, and help us manage our volunteering activities. This can be when you first apply to volunteer with us (which may include completion of a form), are referred to us, and subsequently during your induction and whilst volunteering with us.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, address, telephone number, email address
- Date of birth, year of birth or age category. This is needed for equality monitoring.

- Gender. This may be needed to help place you in a suitable role.
- Next of kin and emergency contact information. See section 4.4 below.
- Employment status and experience.
- Past volunteering experience.
- Contact details of referees. You should ensure that this person is comfortable with us holding their data, and direct them to this Notice for more information as needed.
- Brief notes of any issues arising from your volunteering activities
- Any issues and actions which we record from communications with staff members involved in managing your work with us
- Training events attended.

We may also collect, store and use the following "special categories" of more sensitive personal information about you to ensure that we place you in a suitable role:

- Information about your health, including any medical condition, mental health illnesses or episodes or disability. This is needed to ensure we do not place you in the wrong role, to understand if there are any requirements/adjustments that will assist you in your role.
- Information about your mental health experiences and diagnosis.
- Information about criminal convictions and offences.

The lawful bases for collecting, storing and using your data is through legitimate interests as described above for the different categories of data collected, to the extent consent is not sought.

4.3 Financial Supporters

Supporters include individual donors, donors through online platforms, case studies and event attendees. We need to collect personal information about you in order to administer and manage our relationship with you and the relevant Wimbledon Guild activities you are interested in.

Subject to obtaining your consent, we may also contact you about additional events and fundraising

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, address, telephone number, email address.
- Gender for salutations and equality monitoring.
- Subject to obtaining your consent, bank details for processing single donations and direct debits
- A record of any previous donations.

The lawful basis for collecting, storing and using your data is through legitimate interests as described above for the different categories of data collected, to the extent consent is not sought.

4.4 Next of kin/emergency contacts for clients and customers

Clients and customers receiving befriending, outreach, bereavement and other welfare services, and those who attend our classes, trips and talks, and volunteers, are asked to provide us with the contact details for their next of kin, neighbour or someone else who can be contacted by us if we have any significant concerns or in the case of an emergency.

We ask clients, customers and volunteers to ensure you know that they are passing your details to us and the reason why. You have a right to object.

The lawful basis for collecting, storing and using your data is through legitimate interests in the case of significant concern or an emergency.

4.5 Counselling training delegate

As a delegate attending Continuous Professional Development events and training you will be asked to provide us with your contact details so that we can process your booking via Eventbrite.

The lawful basis for collecting, storing and using your data is that it is necessary for the contract for the provision of training.

4.6 Private room hire counsellors / psychotherapists and other private individuals who book Guild House and Drake House rooms

If you are a self-employed counsellor or psychotherapist or other individual who privately hires rooms from us, we may collect, store and use the following categories of personal information about you:

- Personal contact details such as name, address, telephone number and email address.
- Details of Liability insurance to be eligible to hire a room from us.
- For counsellors and psychotherapists, details of relevant qualifications and organisational membership or registration to be eligible to hire a room from us.

The lawful basis for collecting, storing and using your data is that it is necessary for the contract for room hire and through legitimate interests.

4.7 Website visitors and Social Media users

You may also complete contact or application forms on our website, Facebook or Twitter page, in which case we will use this information to handle your enquiry or application. In relation to customers, clients, volunteers and supporters, see also section 4.1-4.3.

If you contact us by other means, such as email or by telephone, or over social media we may also retain your contact details and your communication in order to handle your query and maintain records of communications.

The lawful basis for collecting, storing and using your data is through legitimate interests, as described above.

5. Direct marketing communications

Subject to obtaining your consent, we may from time to time send you direct marketing communications including:

- Information about our services.
- Information about our fundraising activities and events.
- Information to our volunteers about training opportunities and other ways to get more involved with us.

Everyone has the right to object to receiving these, so we include options to enable you to change the way you hear from us, or to stop receiving all or similar marketing communications from us in future in the footer of all our marketing newsletters (digital and print).

You can also do this at any time by contacting us as follows:

- Telephone: 0208 946 0735
- Email: events@wimbledonguild.co.uk

Please include your full name, and it would assist if you could also specify your relevant email address(es), postal address(es) and/or telephone number(s).

Note: Even if you do not wish to receive marketing communications from us, we may still contact you in relation to other matters relevant to our relationship with you, such as the services you are receiving, or activities and events with which you are involved. However, if you have concerns in relation to the way we are contacting you on other matters, please contact our nominated Data Protection Officer (see section 13).

6. Other uses of your personal information

We may process your personal information for the purposes of safeguarding children or individuals at risk, to protect them/you from neglect or physical, mental or emotional harm; or protect their/your physical, mental or emotional well-being. Please refer to section 8.3 about disclosures.

We conduct data analysis activities on anonymised data for governance, marketing and fundraising purposes.

We may include images relating to our services within our marketing materials and annual impact report, which could include images of your involvement in such services. We will discuss this with you first to ask for your consent.

7. Use of Cookies

Like most websites, we use cookies. Cookies are tiny pieces of data saved on your computer or mobile device. There are several types of cookie and they each have different functions or uses.

We use cookies for a variety of reasons:

- (a) Essential cookies – these are required for the operation of our website, for example to enable you to log in to secure areas of the website or make use of a shopping cart and e-payment services.
- (b) Analytic/performance cookies – these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- (c) Functionality cookies – these are used to recognise you when you return to our website so that we can personalise our content for you and remember your preferences, e.g. whether you are signed up to email alerts.

(d) Targeting cookies – these record your visit to our website, pages you have visited and links you have followed. We may use this information to make our website and the advertising displayed to you more relevant to your interests.

The table below provides more information about the cookies we use and why:

Type of cookie	Function and further information
Google analytics	This is common performance cookie that many websites use. It allows us to collect anonymous information about how you and other users use our website and helps us to improve the website.

8. Data sharing with third parties (disclosures)

We may have to share certain personal information about you with third parties for reasons outlined below. We require third parties to respect the security of your data as well.

8.1 Clients and customers

Healthcare providers. Subject to obtaining your consent, we may need to disclose certain personal details (including health details) to your healthcare providers, such as your GP. This would arise, for example, if you ask us to make a telephone call on your behalf to report concerns, arrange an appointment or to obtain a referral to another health specialist because you have communication difficulties, memory loss or lack confidence.

Individuals in **companies supplying items purchased as part of our grants programme.** Subject to obtaining your consent, we may disclose contact details so that the item(s) can be delivered directly to you. If you ask us to, we may also disclose personal details (including health details) if we think they would help the delivery, for example there are steps leading to your accommodation, you have a hearing impairment and may not hear a doorbell, you may take time to answer the door.

Other professionals working for external agencies. Subject to obtaining your consent, we may need to disclose certain personal details (including health details) with external agencies who need to be involved in the activity or service you have asked us to support you with.

The lawful basis for disclosing your data in these instances is through consent, which we will either obtain at the point of collecting personal data from you or when you ask us to organise this activity or service for you.

Our volunteers, other staff members and trustees. We may need to disclose certain personal details with Wimbledon Guild staff and volunteers directly involved in providing a particular Wimbledon Guild activity or service you have asked us to support you with, or with staff, volunteers or trustees as part of our safeguarding or complaints processes.

Self-employed psychotherapists/counsellors. If you become a counselling client then we may disclose personal details you have shared with us at assessment with your psychotherapist/counsellor, who may not be employed by us but acts on our behalf.

Self-employed class instructors. We may need to disclose certain details about health conditions to your class instructor, who are not employed by us but act on our behalf, as your health may affect your participation in the class.

Emergency contact. We may need to disclose relevant personal details to the individual you have given us permission to speak to in relation to a particular matter or in an emergency (such as family and friend member, or another service provider).

The lawful basis for disclosing your data in these instances is through legitimate interests, for the reasons described above for each of the third parties.

8.2 Volunteers

Subject to obtaining your consent, we may share your personal information, where appropriate, for example:

- with individuals you have given us permission to speak to in an emergency
- in relation to a particular matter you ask us to support you with, such as a professional working for an external organisation
- self-employed class instructors and other volunteers where necessary, to help place you in a suitable volunteering role.

The lawful basis for disclosing your data in these instances is through consent, which we will either obtain at the point of collecting personal data from you or if you ask us to us to support you with a particular matter.

8.3 All individuals (other disclosures)

Third party/ies	Purpose	Lawful basis
Our technology service providers	The organisations hosting our website; Charitylog, CORE and Access databases; event bookings; survey responses; direct marketing emails; Amazon web services; and Office 365 data act as processors on our behalf, meaning that we remain primarily responsible for how they use your data.	Legitimate interests
Other third parties where required or permitted by law.	In these cases we may disclose your personal information without your knowledge or consent, but where practical we will inform you about the disclosure of your personal data at the time.	Legal obligation/ Vital interests/ legitimate interests
Statutory or regulatory bodies and law enforcement authorities	These include the Police and Social Services, where relevant. We may disclose your personal information to protect someone at risk/you from neglect or physical, mental or emotional harm; or protect their/your physical, mental or emotional well-being (safeguarding children or adults at risk). In these cases we may disclose your personal information without your knowledge or consent, but where practical we will inform you about the disclosure of your personal data at the time.	Vital interests/ legitimate interests

9. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements, which may extend beyond the end of our relationship with you.

We keep different types of information for different lengths of time, which are explained in our Retention and Archiving Policy which is available from info@wimbledonguild.co.uk. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

At the end of the retention period any paper-based information will be securely shredded, electronic information is anonymised and any audio or video recordings created solely for training purposes in counselling will be securely deleted or destroyed.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

10. Data security

We take the privacy and security of personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. In addition, we limit access to your personal information to just the people who have a business need to know.

Staff are required to acknowledge and sign that they have read, understood and will comply with data protection requirements as part of their contract of employment upon joining Wimbledon Guild.

Data protection is covered at induction and in supervisions with volunteers who have contact with clients. Volunteers sign a Volunteer Agreement to acknowledge that they have received, read and understood our policies and procedures, including those relating to confidentiality.

We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or loss and have several layers of security measures. Our data security procedures include strict user access controls to all systems, strong password protection and technical security measures such as boundary firewalls, malware protection, and auditable internet use.

11. International data transfers

Our activities are based within the United Kingdom. We do not generally transfer your personal data to countries outside the United Kingdom. Should we ever need to do so, we will check that safeguards are in place to protect your data to a similar standard as under UK law.

12. Your rights in connection with personal information

You have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you, together with additional information about how and why we collect and use it, and to whom we disclose it, in order to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you so that it is accurate and complete. Please keep us informed if your personal information changes during your relationship with us.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. We may only continue if we show a compelling reason to do so. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** to you or a third party, in a structured format, personal information which you have provided to us (also known as the right to data portability).
- Contest any decisions based solely on **automated decision-making**.

There are certain limitations and exemptions to these rights which we may apply depending on the circumstances. If you want to exercise any of these rights, please contact our nominated Data Protection Officer (see section 13).

Right to withdraw consent

Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our nominated Data Protection Officer (see section 13).

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

Right to complain to the regulator

You have the right to make a complaint about how we use your personal data to the Information Commissioner's Office (ICO). Further information about how to do this is available on the ICO's website at www.ico.org.uk.

13. How to contact us about this Privacy Notice

If you have any questions about this Privacy Notice or how we handle your personal information, or wish to exercise any of your rights relating to your personal data, please contact our nominated Data Protection Officer:

Andrew Stodhart
Head of Finance and Resources
020 8946 0735
astodhart@wimbledonguild.co.uk
Wimbledon Guild
Guild House, 30/32 Worple Road,
Wimbledon, London SW19 4EF.

Date of Notice	25 May 2018
Date due for review	May 2019
Person responsible	Data Protection Officer