



Confidentiality and Data Use Policy

Statement of Aims

In order to operate, Ealing Churches Winter Night Shelter (ECWNS) must collect information about current, past and prospective guests, volunteers and employees. The correct treatment of personal data is integral to our successful operations and to maintaining trust of the people we deal with. We aim to collect and process only information that is necessary for the benefit of our guests and the effective running of our organisation.

Data Protection Principles

As a not-for-profit organisation that qualifies for an exemption, ECWNS is not registered under the Data Protection Act 1998. We will comply with data protection principles by making sure that personal data is:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate and kept up to date
5. Not kept longer than necessary
6. Processed in accordance with the individual's rights
7. Secure
8. Not transferred to countries outside the European Economic area unless the country to which the data is to be transferred has adequate protection for the individuals

Conditions

We will ensure that at least one of the following conditions are met before we process any personal data:

1. The individual has consented to the processing
2. The processing is necessary for the performance of a contract with the individual
3. The processing is required under a legal obligation (other than one imposed by a contract)
4. The processing is necessary to protect vital interests of the individual
5. The processing is necessary to carry out public functions e.g. administration of justice
6. The processing is necessary in order to pursue our legitimate interests or those of third parties (unless it could unjustifiably prejudice the interests of the individual)

We will ensure that one of the following additional conditions are met before we process any sensitive personal data:

1. The individual has explicitly consented to the processing
2. We are required by law to process the information for employment purposes
3. We need to process the information in order to protect the vital interests of the individual or another person
4. The processing is necessary to deal with the administration of justice or legal proceedings

Internal Data

ECWNS obtains personal data from its Staff, Volunteers, Trustees and supporters through a

variety of sources, paper or electronic, including Application/Registration Forms and References. This data is processed and stored securely.

External Data

ECWNS obtains personal data from referring agencies, case workers, volunteers and guests themselves about potential and current guests. This data is obtained, processed and stored securely solely to assist Staff and Volunteers in the safe and effective running of shelters. Personal details supplied are only used to send material that is potentially useful. Most of this information is stored on the ECWNS database.

Individuals' rights

We will ensure that individuals are given their rights under the Act including:

- The right to obtain their personal information from us except in limited circumstances
- The right to ask us not to process personal data where it causes substantial unwarranted damage to them or anyone else

Legal requirements

While it is unlikely, ECWNS may be required to disclose user data by a court order or to comply with other legal requirements. We will use all reasonable endeavours to notify people before we do so, unless we are legally restricted.

Sharing of data

Given the explicit consent of the guest on registration, data may be shared with agencies working to help that guest. This includes bulletins and updates to ECWNS volunteers for prayer and support.

Data in anonymised form is shared with other organisations working in the same field to assist reporting and policy making. ECWNS shall not sell, rent, distribute or otherwise make user data commercially available to any third party, except as described above or with your prior permission.

Our commitment to data protection

We will ensure that:

- Everyone managing and handling personal information understands that they are responsible for following good data protection practice
- Staff who handle personal information are appropriately trained
- Queries about handling personal information are promptly and courteously dealt with
- People know how to access their own personal information
- Any disclosure of personal data will be in compliance with approved procedures
- We take all necessary steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure

This policy is reviewed regularly and updated as required.

Adopted on:.....18 June 2015.....

Last reviewed:.....