

# Doorway

## Privacy Policy

### Who are we?

Doorway Wiltshire Ltd. is an independent charity which provides a key support service for people who are homeless or vulnerably housed in the North Wiltshire area.

This privacy policy explains how we use any personal information we collect about you when you use our services.

### What information do we collect about you?

We collect information about you:

1. when you register with us by completing a Guest Form,
2. every time you sign-in to a drop-in or group at Doorway,
3. if you apply to be a member of Doorway,
4. if you apply for jobs or volunteer roles,
5. when we undertake surveys
6. if you provide us with references or a quote
7. if we record information about you that you have told us for outcome monitoring purposes
8. when you sign in for football sessions
9. when you complete medical forms for football sessions
10. if you donate funds to us
11. if you supply us with products or services

### According to the General Data Protection Regulations (GDPR) what is our lawful basis for processing your personal data?

In every case on the forms we ask you to complete we ask for your explicit written consent to the processing of your data and state what we will be doing with the data. If you donate to us we will ask your permission to hold your data and advise you what we will do with your data.

### How will we use the information about you?

1. Guest forms are used for statistical purposes and the data may be used for statistical evidence of Doorway's work. In such circumstances the data is presented in a fully anonymised form so that the individuals to whom the data refer cannot be identified.
2. Visitor registers are used for statistical purposes and the data may be used for statistical evidence of the work of the centre. In such circumstances the data is presented in a fully anonymised form so that the individuals to whom the data refer cannot be identified.

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3. Member application forms are used for communication purposes. We may email or post invitations to meetings from time to time.
4. Job or volunteer role applications will be used for assessment of suitability for roles and for communication on an ongoing basis. Communication will either be job satisfaction surveys or contact regarding the operation of Doorway. e.g. emails regarding attendance.
5. If you work for us we retain details of your address and bank details for pay and benefits.
6. Surveys will be specifically used to assess the activity of the charity, to determine future activity and to determine job satisfaction.
7. If you donate funds to us we will thank you for the funds and get your explicit written consent to hold your data and send you newsletters and ongoing updates on Doorway activity.
8. If we hold information about you in the Daybook we will enable staff to be aware of your circumstances for your personal benefit only.
9. If you supply us with products or services, we retain your address and phone number details and details of your bank account if you want to be paid by BACS.

## **Sharing of your data**

All members of staff, volunteers and trustees are bound by our Confidentiality Policy and have been instructed on the legal requirements regarding Data Protection.

We will not share your data with any third party without your written consent.

Generally, the only reason to share personal information with a third party is for the benefit of the individual guest or member of staff/ volunteer.

There is a legal duty to share some information, as follows:

- Personal information will be divulged if required by a court order
- Evidence of drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the Police.
- Information about a child who is at risk of significant harm will be passed to the relevant Children and Families team.
- Where there is concern that a service user is at serious risk of harming themselves or other people the appropriate agencies will be informed.

## **How do we ensure your data is kept secure?**

All paper documents containing subjects' data are locked away in the office. Access to the data is covered in our Confidentiality Policy and is only available for authorised members of staff.

Electronic data is either held in files saved on Onedrive or on computers in the Doorway office.

All computers are password protected and passwords are changed regularly.

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We maintain a database of sensitive guest information. This is encrypted, and the security control is regularly monitored to reflect changing security issues.

## **How long do we keep your data for?**

Paper documents are held for 3 years as a maximum then shredded.

Electronic documents are securely archived after 3 years

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Doorway Wiltshire Ltd, The Citadel, Bath Road, Chippenham or telephone 01249 445385 or email [admin@doorwayproject.org.uk](mailto:admin@doorwayproject.org.uk) if you wish to make a request.

**Due for review October 2023**