



# Windsor Christian Action

Supporting Vulnerable People in the Windsor Community

## PRIVACY POLICY

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## Revision History

Revision	Paragraph Number	Revision
March 10 2016		New Document
May 2018	Whole Document	<p>Document name changed from “Data Protection Policy” to “Privacy Policy.</p> <p>Re-formatted to include revision history, paragraph numbers, Abbreviation, Acronym, Term and Definitions/Meaning table.</p> <p>Significantly re-written to reflect changes required by the General Data Protection Regulations which come into force on 25<sup>th</sup> May 2018.</p>
April 2020	Whole Document	Reviewed and minor changes made mainly to make reference to the various WCA projects
April 2021	Whole document	Reviewed and names updated, as Michael McEvoy has left WCA as Secretary.

## Abbreviations, Acronyms, Terms and Definitions / Meanings

Abbreviation / Acronym / Term	Definition / Meaning
Biometric Data	Personal information about an individual’s physical or behavioural characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.
WCA	Windsor Christian Action
Data Controller	Organisations, that determine how people’s personal data is processed and for what purpose.
Data Subjects	Any living individual whose data the Data Controller processes.
WMBC	Windsor and Maidenhead Borough Council
DSAR	Data Subject Access Request
HMRC	Her Majesty’s Revenue & Customs

RIDDOR	Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 2013
Personal Data	Everything from which a Data Subject can be identified. It ranges from simple contact details via individuals' files to safeguarding information, and encompasses opinions, file notes or minutes, a record of anyone's intentions towards that person, and communications (such as emails) with or about them.
GDPR	General Data Protection Regulations
Processing	Any action in relation to that personal data, including filing and communication.
Social Protection	Concerned with preventing, managing and overcoming situations that adversely affect people's well-being and is designed to reduce poverty, diminish people's exposure to risks and enhance their capacity to manage social risks.
Special Category Data	Some categories of Personal Data are special category data under GDPR. These comprise data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health or data concerning a natural person's sexual orientation; and biometric data.

## Aim / Objective / Statement of Intent

This policy applies to Windsor Christian Action (WCA) and all its Projects.

1. This policy is intended to provide information about how the Charity will use or *process **the personal data*** it holds in its files and records about individuals.
2. This information is provided because Data Protection Law gives individuals rights to understand how their data is used, and to encourage them to read this Privacy Policy and understand the Charity's obligations to its entire community.
3. This Privacy Policy applies alongside any other information the Charity may provide about a use of personal data, including:
  - Any contract between the WCA and its Staff, Members, Stakeholders, Service Providers and Benefactors;
  - The WCA's Data Protection Policy;
  - The WCA's various safeguarding, pastoral, and health and safety policies, including how concerns or incidents are recorded.

4. Anyone who works for volunteers for, or acts on behalf of, the WCA and any of its Projects (currently Foodshare, Windsor Homeless Project, Street Angels and More Than a Shelter) should also be aware of and comply with this Privacy Notice..

## Responsibility for Data Protection

5. The Trustees of WCA have appointed Jane Deakin (Secretary to Trustees) to deal with any requests or enquiries concerning the Charity's use of personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Policy and Data Protection Law.
6. The Trustees can be contacted via email to [secretary@windsorchristianaction.org](mailto:secretary@windsorchristianaction.org) or by post to The Secretary of WCA, Windsor Baptist Church, Victoria Street, Windsor SL4 1EH.
7. The WCA's charitable registration number 1154308 is and its registered address is Windsor Baptist Church, Victoria Street, Windsor SL4 1EH.

## Why the Charity needs to process personal data

8. To carry out its ordinary duties, the Charity needs to process a wide range of personal data about individuals (including current, past and prospective staff, volunteers and guests) as part of its daily operation.
9. Some of the Charity's activities will be to enable it to fulfil its legal rights, duties or obligations to individuals e.g. staff under a contract, or volunteers, guests or service providers.
10. Other uses of personal data will be made in accordance with the WCA's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.
11. We must have a legal basis to handle data and in the majority of cases this will fall within the 'legitimate interest' category:
  - For the purposes of staff and volunteer selection and to confirm the identify of those individuals concerned;
  - To provide services to guests, including helping them find accommodation, security etc
  - Maintaining relationships with Members, Donors, Service Providers, Fundraisers and Marketeers.
  - For the purposes of management planning and forecasting, and research and statistical analysis, including that imposed or provided for by law.
  - For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
  - To enable relevant authorities to monitor the Charity's performance;
  - To publish the achievements of any of the Projects, fundraising successes or guest services offered to promote the Charity's work;
  - To safeguard the welfare of any of the Charity's guests, staff and volunteers by, for example, accessing emails/notes of correspondence and meetings with either internal or external parties, in order to ascertain

if there are/were any concerns regarding safeguarding issues or disciplinary matters, of which the Charity should be aware);

- To make use of photographic images of staff and volunteers within the WHP Centre or on the WCA website;
- To carry out or cooperate with any WCA or external complaint, disciplinary matter or investigation process;
- Where otherwise reasonably necessary for the Charity's purposes, including to obtain appropriate professional advice and insurance for the charity.

12. In addition, the Charity will on occasion need to **process special category personal data** (concerning political opinions, religious beliefs, trade union membership, health, sex life or sexual orientation, genetics or biometrics) in accordance with rights or duties imposed on it by law, or from time to time by explicit consent where required. Where the processing is carried out during our legitimate activities and is not disclosed to a third party, we do not require explicit consent. The reasons for processing special category data will include:

- To safeguard the welfare of guests, staff and volunteers and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, cooperation with police or social services, and for insurance purposes or for catering purposes where there is a need to be aware of an individual's dietary or medical needs;
- For legal and regulatory purposes (for example vulnerable adult protection or health and safety purposes) and to comply with the charity's legal obligations and duties of care.
- With regards to criminal convictions, the legal basis we would have for holding this data is with the legitimate interests of guests concerned. We also must have a specific condition for processing this data, either legal authority or official authority. Given that this data is either provided by guests or the Police, we consider we have official authority to process this data when necessary, but always with strong safeguarding in place.
- In addition, the Charity will on occasion need to process special category personal data under the lawful basis of "Vital Interests", but this would only be in the case of a "life and death" situation.

## Types of Personal Data processed by the WCA

13. This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Bank details for Members and Donors who make payment directly to the Charity;
- Financial information for potential Donors who require it;
- Where appropriate, information about a guest's health and welfare;

- Where necessary, any relevant information re guests provided by external agencies and/or other professionals or organisations;
- Personnel files for staff, volunteers, service providers, contractors, and trustees;
- Processing necessary in the field of employment and social security and social protection law;

## How the Charity collects data

14. Generally, the Charity receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as an email or written assessments).
15. In some cases, personal data will be supplied by third parties (for example authorities working with that individual) or collected from publicly available resources.

## Who has access to personal data and with whom does the Charity share it?

16. Occasionally, the Charity will need to share personal information relating to members of its community with third parties, such as:
  - Professional advisers (e.g. lawyers, insurers, etc)
  - Government authorities (e.g. HMRC, Police or the Local Authority);
  - Appropriate regulatory bodies (e.g. The Charity Commission or The Information Commissioner's Office)
17. For the most part, personal data collected by the Charity will remain within the Charity and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a "need to know" basis). Particularly strict rules apply in the context of:
  - Medical records (but not allergy information)
  - Pastoral or safeguarding records; and
  - Records of criminal activity
18. The Charity is required by the Health and Safety Act 2015 to record incidents or accidents and near-misses, and report to the HSE any which meet a certain threshold of seriousness in their nature, according to RIDDOR. Some of these may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or the Police.
19. In accordance with GDPR, some of the Charity's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the Charity's specific directions.

## How long should personal data be kept?

20. The Charity will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. However, Insurance Schedules (Liability), RIDDOR and accident/incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. These may be up to 50 years. For further details please refer to the Charity's Policy on the Storage of Confidential Documents.
21. If an individual has any specific queries about how our data retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact **Jane Deakin**, via email, at [secretary@windsorchristianaction.org](mailto:secretary@windsorchristianaction.org) . However, please bear in mind that the Charity may have lawful and necessary reasons to retain some personal data, even following such a request. After verifying the request, we will supply the data within a maximum of one month.
22. A limited and reasonable amount of information may need to be retained, even after an individual has left, if there is a legal reason to do so.

## Keeping in touch and supporting WCA

23. The WCA will use the contact details of its staff and supporters to keep them updated about the activities of the WCA and its Projects unless specifically requested by an individual not to do so.
24. The Charity will also:
  - Contact potential donors and fundraisers by post and/or email to promote and raise funds for the Charity;
  - Collect information from publicly available sources to maximise the Charity's fundraising potential, publicise the Charity or one of its events, or update and inform its community of latest successes and achievements;
  - Should an individual wish to limit or object to any such use, or would like further information, please contact Jane Deakin, via email, at [secretary@windsorchristianaction.org](mailto:secretary@windsorchristianaction.org)
25. The Charity will endeavour to respond to any written requests regarding an individual's rights to have their personal data amended or erased as soon as is reasonably practicable and in any event within statutory time limits (which is 30 calendar days in the case of requests for access to information (also known as DSAR or Data Subject Access Requests). Whilst the Charity will aim to respond to DSARs within the statutory time limits, more complex requests may take longer. The Charity will advise of any anticipated delay along with reasons why it cannot respond within the 30 calendar-day time limit, should this be necessary. The Charity has a right to charge a reasonable fee for any unreasonable or excessive requests or for producing multiple copies of information.

## REQUESTS THAT CANNOT BE FULFILLED

26. Individuals should be aware that the right of access is limited to their own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege (for example legal advice given to or sought by the Charity, or documents prepared in connection with a legal action).
27. Occasionally the Charity may have compelling reasons to refuse specific requests to amend, delete or stop processing an individual's personal data either for a legal reason or where it falls within a 'legitimate interest', as



identified in this Privacy Notice (See paragraphs 11 and 12). All such requests will be considered on their own merits.

## DATA PROTECTION LAW RIGHTS

THE RIGHTS UNDER DATA PROTECTION LAW BELONG TO THE INDIVIDUAL TO WHOM THE DATA RELATES. HOWEVER, THE CHARITY MAY SOMETIMES RELY ON OTHER AUTHORITY FOR THE NECESSARY WAYS IT PROCESSES PERSONAL DATA RELATING TO AN INDIVIDUAL

28. The Charity community is required to respect the personal data and privacy of others, and to comply with the Charity's Anti-Bullying Policy and Safeguarding Policy.

## Data Accuracy and Security

29. The Charity will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the WCA Secretary, Jane Deakin, the WHP Manager, or the More Than a Shelter Project Coordinator, Yvonne Conroy of any significant changes to important information, such as contact details, held about them.

30. An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law); please see above for details of why the Charity may need to process your data and who you may contact if you disagree.

31. The Charity will take appropriate technical and organisational steps to ensure the security of personal data individuals.

## This Policy

32. The Charity will update this Privacy Notice from time to time. Any substantial changes that affect an individual's rights will be provided to them directly, as far as is reasonably practicable.

33. Any comments or queries on this policy should be directed to Jane Deakin via email to [secretary@windsorchristianaction.org](mailto:secretary@windsorchristianaction.org)

34. If an individual believes the WCA has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the WCA Complaints Procedure, details of which can be obtained from Jane Deakin. You can also make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the Charity before involving the regulator.

Date: 26th April 2021

**Windsor Christian Action**  
Windsor Baptist Church Windsor, Berkshire SL4 1EH  
[www.windsorchristianaction.org](http://www.windsorchristianaction.org)  
Charitable Incorporated Organisation No: 1154308

Windsor Christian Action is the umbrella charity for the following: Windsor Homeless Project, Windsor Street Angels, Windsor Foodshare and More than a Shelter.