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**Data Privacy Policy**

**Scope:** Applies to all Hope Housing Trustees, employed staff, volunteers, clients, and supporters

**Date of policy:**  March 2023

**Approved by Board of Trustees:**  March 2023

**Date for review:** March 2024

**Compliance Officer:** CEO

1. Hope Housing follows the guidelines of the Data Protection Act 1998, and the General Data Protection Regulations (2018) and upholds them in all our dealings with volunteers and staff, those to whom we provide accommodation and support services and our supporters and donors.
2. We collect and record personal information about individuals when they enquire about using any of our services, as part of us providing them with our service(s), or when they register an interest in supporting us, complete a donation and/or Gift Aid form etc. We will also collect information about individuals if they contact us to apply for a volunteer or paid role working for Hope Housing. Website usage information may be collected using cookies.
3. Our website may record some personal information, for example, by logging IP addresses or the location of the computer or network. It may also record information entered into any online forms. Other data may be collected anonymously about use of our site from cookies. Cookies are small text files that are placed on a user’s computer by websites that they visit. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit allaboutcookies.org.
4. We may use website cookies to establish the needs of visitors and customise the content of our website; to process any forms, requests or applications; for internal administration and analysis.
5. Our website may contain links to other websites. This privacy policy only applies to the Hope Housing website so if users link to other websites, they should read their own privacy policies. In addition, if users linked to our website from a third party site, Hope Housing cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and it is the user’s responsibility to check the policy of that third party site.
6. Personal data held by Hope Housing (whether paper or electronic), including where applicable, sensitive client personal data, will always be stored securely, and only staff and volunteers involved in providing services or supporter information will have access to it.
7. We will use the information collected to contact individuals to provide details of our services and various news updates. We will then use information to provide individuals with any service(s) we have agreed with them. As a faith-based charity, we may also offer you our support through prayer. We may also contact you with information about other services Hope Housing offers that may be deemed to be suitable, or to invite participation in research and feedback in relation to our services. We may also use the information to invite individuals to any events that we may run from time to time, if we consider that they might be of interest.
8. For supporters and donors – we will use the information we collect, including level of interest, support for us and location, to tell you more about our work. We may also thank you for your support, and invite you to continue to support us. We may also use your information to ask if you would be able to increase your support. We may also analyse the information we collect about you to aid our understanding of our supporters, understand the level of any potential donations, profile supporters into categories and help provide a personalised service to you. We will always do this in compliance with the rules in relation to direct marketing, including those set out by the Fundraising Regulator.

1. Individuals will have a choice about whether or not they wish to receive information from us. If they do not want to receive direct communications from us about the work we do, then they can select their choices by ticking the relevant boxes situated on the form on which we collect personal information or a subsequently issued consent form.
2. We will only contact individuals by email, phone, text message or post if they have given their prior consent. Individuals can change their contact preferences at any time by contacting us by email at contact@hopehousing.org.uk or by writing to us at Hope Housing, The Millside Centre, 131 Grattan Road, Bradford, BD1 2HS.
3. Upon initial assessment by Hope Housing, potential clients shall be informed that their details may be stored physically and/or electronically, and that the process of finding them accommodation or further support may involve passing those details to other service providers or prospective landlords. It will be made clear that this may include details of any criminal convictions, mental health issues or substance dependencies. Hope Housing will keep a record of when this information was issued, and by whom.
4. Prospective clients who do not agree to their data being used in such a way will be informed of the severe limitations that imposes on Hope Housing’s ability to assist them, and a record will be kept of their decision.
5. We will only hold personal data for as long as it is required. Deleting information may involve either the removal of the data or its anonymisation, meaning that it no longer continues to be personal data that will identify you. Please contact us via contact@hopehousing.org.uk or by writing to us at Hope Housing, The Millside Centre, 131 Grattan Road, Bradford, BD1 2HS if you wish to request that your data be deleted.
6. Personal data of clients will remain on file for a period of six months from Hope Housing’s last dealings with its subject. After that time, data will be archived securely, and retrieved only if the subject returns to the charity for further support. Data will be permanently destroyed seven years from the date of Hope Housing’s last dealings with its subject.
7. Anyone about whom Hope Housing holds data shall have the right to request details of the information held by contacting us at the address below. The charity does, however, reserve the right to only provide access to the data at reasonable intervals. It will help to process the request if individuals can be specific about the information required, otherwise we may need to contact the individual again to clarify this. We will respond to any such request within 40 days of receiving the written request. Individuals have the right to request that we update or correct any information we hold about them.
8. The Company’s Data Controller is ???????
9. The Data Protection Officer is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.
10. The CEO is responsible for ensuring that all employees, agents, contractors or other parties working on behalf of the company comply with the policy and where applicable must implement such practices, processes, controls and training as are reasonably necessary to ensure such compliance.
11. Any questions relating to this Policy or to Data Protection Law should be referred to the Data Controller. In particular, the Data Controller should always be consulted in the following cases:
12. if there is any uncertainty relating to the lawful basis on which personal data is to be collected, held, and/or processed;
13. if consent is being relied upon in order to collect, hold, and/or process personal data;
14. if there is any uncertainty relating to the retention period for any particular type(s) of personal data
15. if any new or amended privacy notices or similar privacy-related documentation are required;
16. if any assistance is required in dealing with the exercise of a data subject’s rights (including, but not limited to, the handling of subject access requests);
17. if a personal data breach (suspected or actual) has occurred;
18. if there is any uncertainty relating to security measures (whether technical or organisational) required to protect personal data;
19. if personal data is to be shared with third parties (whether such third parties are acting as data controllers or data processors);
20. if personal data is to be transferred outside of the UK and there are questions relating to the legal basis on which to do so;
21. when any significant new processing activity is to be carried out, or significant changes are to be made to existing processing activities, which will require a Data Protection Impact Assessment;
22. when personal data is to be used for purposes different to those for which it was originally collected;
23. if any automated processing, including profiling or automated decision-making, is to be carried out; or if any assistance is required in complying with the law applicable to direct marketing.
24. We may change this Policy from time to time and will inform you if we do so. By providing us with information, you’re agreeing to be bound by this Policy.
25. For more information about your legal rights in relation to the information we hold about you, please visit the Information Commissioner’s Office at ico.org.uk .