

Our Privacy Policy

1. About this Policy

LDHAS helps many people every year struggling with housing poverty or homelessness through our advice and support services. When carrying out our work we process personal data about people who receive advice, guidance or housing support services from us – or provide us with support through donations or volunteering. We are committed to protecting your privacy and take this responsibility very seriously. We therefore take care to safeguard it. This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

References to 'we' or 'us' are to LDHAS, Lancaster and District Homeless Action Service Limited, registered charity no: 1093016 (England & Wales) of Edward Street, Lancaster, Lancashire, LA1 1QH.

We regularly check this notice to ensure we provide you with the most up-to-date information regarding our data processing activities. We strongly advise you to read this page from time to time to ensure you are happy with any changes that might be made.

This privacy policy was prepared to be as comprehensive as possible, but it does not include an exhaustive list of every aspect our collection and use of personal information. However, we would be happy to provide any further information or explanation about our practices.

If you have any questions about this policy, please contact us using the details in the 'Contact us, section below.

This privacy policy was last updated in May 2018.

2. Why we collect your data

We collect personal data for many reasons, including to provide you with services, communicate with you and send you information you have requested, and administer campaigns and donations. Depending on how you interact with us, we may process data for the following reasons:

1. to provide you with advice and support services that you have requested or been referred to
2. to record personal details shared during conversations with us
3. to process personal details required for the administration of your donation
4. to record and contact you regarding payments you make to LDHAS
5. to administer services LDHAS is providing to you
6. to communicate with you regarding LDHAS's work, fundraising, and campaigning activities

7. to process donations and administer Gift Aid information for any donation you make to LDHAS
8. to provide you with information about and to administer events, including mass participation events, concerts, and festivals
9. for our own internal administrative purposes, and to keep a record of your relationship with us
10. to manage your communication preferences
11. to process job applications or volunteer placements
12. to conduct surveys, research and gather feedback
13. to obtain information to improve LDHAS's services and user experiences
14. to carry out research to find out more information about our supporters' and prospective supporters' backgrounds and interests
15. to comply with applicable laws and regulations, and requests from statutory agencies

3. Information we collect

We collect the following personal information:

1. your full name
2. contact details – including your postal address, telephone number(s), and email address
3. date of birth
4. details of your case when providing you with housing or benefits advice or services
5. your bank details
6. records of your correspondence and engagement with us
7. donation history and Gift Aid details
8. information you may enter on the LDHAS website
9. photographs, video or audio recordings
10. occupation
11. biographical information
12. other information you share with us

This information may be collected via:

13. any paper forms you complete
14. telephone conversations or face-to-face interactions
15. digital forms completed via our website, or online surveys
16. third-party companies and websites such as Just Giving
17. publicly available sources
18. communication via social media

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. For example, we may make a record that a person is in a vulnerable circumstance to comply with requirements under charity law and the Code of Fundraising Practice, to ensure that we do not send fundraising communications to them.

4. **Using your personal data** **LDHAS Services**

If you are receiving advice, guidance or support from us, we will need to process your data because of your specific relationship with us.

We will keep all your case information – including notes, letters and information given to us about you – in a confidential record that is specific to you. We use a bespoke customised database system (Intrashare) to support our advice, guidance and support. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your case(s). This ensures that we provide appropriate and accurate advice or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or one of the other purpose discussed in this notice.

To ensure that our services meet a high standard of quality, client files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors if the work we do is funded by another organisation or charitable funder. All auditors are bound by confidentiality policies.

We may use your data for statistical reports. These statistics will not include any information that could be used to identify any individual.

Fundraising/campaigning/direct marketing

We would love to keep you up to date with our fundraising, marketing and campaign activity.

We use a range of marketing activities and channels to contact our supporters – including our website, face-to-face fundraising, direct mail, email, and telephone.

We will obtain your consent to contact you by email for marketing purposes. We will also obtain consent from all new supporters (who sign up after 25 May 2018) to make marketing calls.

We will send you marketing by post, on the basis of it being within our legitimate interests to do so, unless you opt out. See section 10 ('Our legal basis for processing data') for more information about our use of legitimate interests. We will also contact existing supporters by phone on this basis (unless they are registered with the Telephone Preference Service or have opted out of receiving marketing communications from LDHAS).

We send the following marketing materials:

1. **updates about LDHAS's work** – including newsletters and other publications informing you about our work
2. **campaigns** – information about our campaigning activities and updates about the progress of our campaigns (if any)
3. **appeals and fundraising activities** – including requests for donations, how you can raise money on our behalf, attend or take part in a fundraising event,

communications relating to our raffles, and updates on the impact that your fundraising activities have had on our work

4. **events** – including details of our challenges, such as sponsored runs and activities, as well as other events such as concerts and drama activities in aid of LDHAS. Please note that if you sign up to a LDHAS event, we will also send you administrative communications about how you can take part. On occasion we will also send you a reminder about the same event in future years, in case you want to participate in it again
5. **volunteering** – information about how you can help support LDHAS by giving up your time or using your influence to progress our aims, along with updates on the impact of your work
6. **professional services** – including details of the professional services that LDHAS offers, such as training and publications

We will **never** share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the ‘Contact us’ section below.

Any electronic communications, such as emails, will not have a link to unsubscribe from future electronic communications, so you will need to communicate you wish not to receive further communications by contacting the Manager on 01524 842008.

If you make any changes to your consent, we will update your record as soon as we possibly can. It may take up to 7 days for our systems to update and stop any postal communications from being sent to you. Email communications will, however, be stopped within the 7 days stated.

Administrative communications to supporters

In addition to the fundraising and marketing communications that you receive from LDHAS, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters. For example, we will call you after you have set up a Direct Debit to confirm your details, and upon cancellation. There may also be other occasions where we need to contact you about your donation – for example, if there is a problem with a payment or in relation to your gift aid declaration.

On occasion, we will also contact you about an event that you have signed up to participate in, to – for example – check that fundraising pages have been set up and to provide any other necessary information.

As mentioned above, we may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

5. Applying for a LDHAS job

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process

through the statistics collected. Where we need to share your data – such as for gathering references, obtaining a Disclosure and Barring Services (depends on the role), or a prison clearance (depends on the role) – you will be informed beforehand, unless the disclosure is required by law. These checks are only done after a position has been offered only to the successful candidate. On the application form, you are asked to complete the referee details, and can tick permission to contact referee. If tick yes, once offered a role, we will automatically send out reference requests. If you tick no, we will contact successful candidates for permission first.

Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it. If we feel there is another suitable vacancy available, we will contact the applicant prior to sharing your application details with the relevant manager.

Once you have taken up employment with LDHAS, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

6. Professional contacts

We may collect data about professional contacts and partners with whom we work. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

We may send our professional partners information and updates about our work (primarily by email). Such contacts can opt out of receiving this information at any time.

7. Our legal basis for processing personal data

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that we carry out. This includes information that is processed on the basis of:

1. a person's consent (for example, to send you direct marketing by email)
2. a contractual relationship (for example, to provide you with goods or services that you have purchased from us)
3. processing that is necessary for compliance with a legal obligation (for example to process a Gift Aid declaration, and carrying out due diligence on large donations)
4. Shelter's legitimate interests (please see below for more information)

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Our legitimate interests include:

- Charity Governance: including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes
- Administration and operational management: including responding to solicited enquires, providing information and LDHAS services, research, events management, the administration of volunteers and employment, and recruitment requirements
- Fundraising and Campaigning: including administering campaigns and donations, and sending direct marketing by post (and in some cases making marketing calls), sending thank you letters

If you would like more information on our uses of legitimate interests, or to change our use of your personal data in this manner, please get in touch with us using the details in the ‘Contact us’ section below.

Disclosure of your personal data

We will not share any of your personal data to any third party – except where:

0. the transfer is to a secure data processor, which carries out data processing operations on our behalf (please see section 13 for more information)
1. we are required to do so by law, for example to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation
2. it is necessary to protect the vital interests of an individual
3. we have obtained your consent

We will **never** share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

Security of your personal data

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We encourage you to review the privacy statements of websites you choose to link to from the LDHAS website, so that you can understand how those sites collect, use and share your information. We are not responsible for the privacy statements, security, or other content on sites outside of the website.

Use of data processors

We may use a third-party supplier to manage mailings for fundraising appeals, campaigns, conduct research surveys or storage of your personal information on our behalf. You can find out more about the suppliers that we use by getting in touch with us using the details in the 'Contact us' section below.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from us, and in accordance with a data processing agreement entered into between Shelter and the supplier.

Retention of your data

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc., or any contractual obligation we might have – such as with government contracts or if we have a business case, such as with research data. For business case data, we will anonymise the data so no individual is identifiable.

Subject to the above, we will typically store data relating to donors and people who have taken campaign actions for seven years after their last donation or interaction, and people to whom we provide services to for seven years after completion of those services. Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

Your rights

You have many rights under data protection legislation. These include:

0. Right of Access

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as

the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by:

1. emailing the Manager at admin@ldhas.org.uk
2. writing to the The Manager at LDHAS, Edward Street, Lancaster, Lancashire, LA1 1QH

1. Right to be informed

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

2. Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

3. Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

4. Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

5. Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

6. Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

7. Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

Complaints

If you have any complaints about the way in which we have used your data, please get in touch with us using the details in the 'Contact us' section below. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the [Information Commissioner's Office](#)

Contact Us

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in section 12 above, you can get in touch with us in the following ways:

0. admin@ldhas.org.uk
1. 01524 842008 (local rate number)
2. LDHAS, Edward Street, Lancaster, Lancashire, LA1 1QH