

	<h1>Privacy Notice</h1>	
Date last reviewed: n/a	Date: 24 May 2018	Due for review: May 2020

1. Introduction

This Privacy Notice sets out information in relation to the processing of data and how privacy of data is protected. The privacy and security of your personal information is extremely important to us. We want to make sure you are informed and can be confident about giving us your information.

We, NIWE Eating Distress Service (NIWE), are the ‘controllers’ of the information which we collect about you (‘personal data’). Being controllers of your personal data, we are responsible for how your data is processed. The word ‘process’ covers most things that can be done with personal data, including collection, storage, use and destruction of that data.

This notice explains why and how we process your data, and explains the rights you have around your data, including the right to access it, and to object to the way it is processed. Please see the section on ‘Your rights as a data subject’ for more information.

We are a registered charity and company limited by guarantee and our contact details are:

Address:	NIWE Eating Distress Service, The Old Post Office, 5 Pink Lane, Newcastle upon Tyne, NE1 5DW
Email:	enquiries@niwe.org.uk
Telephone number:	0191 221 0233

Our Data Protection Lead is Ann Dymyd, the Chief Executive, whom you can contact at the above address.

2. Scope

This policy applies if you use our services or are a parent, carer, donor, volunteer, trustee, visit our website, email, call or write to us. In certain circumstances we may also provide an extra privacy notice, which we will always inform you about.

3. Responsibility for Implementation

All staff, volunteers and trustees are responsible for the implementation of this policy, with overall responsibility resting with the Chief Executive.

4. Dissemination

NIWE disseminates policies and procedures to relevant staff, volunteers and Trustees by:

- Hard and/or electronic copies of current policies and procedures provided during induction.
- All policies and procedures available to staff on the shared drive, and to volunteers and Trustees on request and/or as appropriate.

- Updated/new policies and procedures circulated by email, and discussed in staff meetings and/or Trustee meetings as appropriate.
- Policies and Procedures being a standing item on staff and Trustee meeting agendas.

As this Privacy Notice also applies to service users and anyone contacting us with an enquiry it is also available on our website.

5. What do we mean by personal data?

‘Personal data’ is any information that can be used to identify a living person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed. We keep special category data in accordance with Article 9, section d of the General Data Protection Regulations, which details the legal requirements for charities to hold this type of information.

We are committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process data if we need to for a specific purpose, as explained below.

6. How we collect your personal data

a. Information provided by you

We collect your personal data mostly through our contact with you, and the data is usually provided by you when you: enquire about our services; register as a service user with NIWE; tell us about your experience of eating distress, access services and attend events; donate or fundraise on our behalf or other things that we do in the course of our work.

b. Information provided by other people

In some instances we may receive data about you from other people/organisations e.g. when they refer you to us for support.

c. Personal data created by your involvement with us

Your activities and involvement with us will result in personal data being created. This could include details of the events and activities sessions you’ve attended, records of the support we’ve provided, how you’ve helped us by volunteering etc. If you decide to donate to us we will keep records of when and how much you give.

7. How we use your information

Any information we hold about you will be stored securely and treated in accordance with the relevant legislation (currently the General Data Protection Regulations (GDPR)).

In general terms, we process your data in order to manage our relationship with you. We will use the information that you give to us:

- To send you information that you have asked for
- To understand your situation so we can offer you individually tailored support to meet your needs

- To contact you about other services which may help you
- To inform you about events, fundraising, campaigning and our other work
- To administer your donation or support your fundraising, including processing Gift Aid
- To keep a record of your relationship with us
- To ensure we know how you prefer to be contacted

More detailed information on how we use your personal information, including how long we keep it for can be found below.

What we collect/generate	Why we hold it	How long it will be kept for
<p>Service delivery data</p> <p>Information we collect in order to support you as a service user, parent, carer or professional. This includes but is not limited to:</p> <p>Details about you and the person you care for, including where you live, how to contact you, which of our services have helped you in the past, etc.</p> <p>This may include special category data relating to the health of yourself and/or the person you care for.</p>	<p>We keep this information to understand your situation so that we can offer you support to meet your needs and to contact you about other services which may help you.</p>	<p>The majority of your data will be kept in our secure database for as long as you are supported by our charity.</p> <p>After this, or if we lose contact with you, your record will be archived. This means we could find it if you needed our support again (see Historic Data section below).</p>
<p>Marketing data</p> <p>This is information we use to send you our newsletter and other updates. This includes but is not limited to:</p> <p>Your postal address, email, phone number and contact preferences.</p> <p>We may also process special category data for marketing purposes, e.g. to identify service users who may benefit from specific NIWE or other services and activities.</p>	<p>We keep this information so we can send you general information on our events and activities, such as our newsletter. This counts as marketing under GDPR. We aim to provide information in the best format for you.</p>	<p>We only send newsletters and updates if you have opted in for them. We generate these mailing lists from our secure database (see above for retention period) and will remove you from the mailing lists within two weeks of receiving your request to unsubscribe.</p>
<p>Monitoring data</p> <p>Information we generate to monitor our service, report to</p>	<p>We use your data to generate statistical information which</p>	<p>The monitoring data is kept with your record</p>

<p>our funders and prove that we are meeting our charitable aims and objectives.</p> <p>The reports we generate are statistical, and it is not possible to identify individuals from the completed report.</p> <p>This includes special category data such as health conditions, ethnicity, sexuality etc.</p>	<p>funders and to local services and health consultations.</p> <p>We also use this data to check whether we are reaching all parts of the community and to identify any gaps in our services.</p>	<p>(see above for retention period)</p>
<p>Financial information</p> <p>If you make a donation, we will keep financial records of any payments received. This information includes but is not limited to:</p> <p>Dates and amounts of payments, the account the payment was made to, Gift Aid eligibility etc.</p>	<p>We use this information to meet our legal requirement to keep accurate financial records.</p>	<p>We are legally obliged to keep this information for a minimum of 7 years.</p>
<p>Photo, video and audio</p> <p>We will only use photos, videos or audio of you with your express permission, and will always explain how we intend to use it.</p>	<p>We use photos, videos and audio to raise awareness and to promote our services and their benefits to funders and service users.</p>	<p>We keep copies of photos, videos and audio in our archive on our secure server.</p> <p>Once photos, videos or audio are uploaded to a website or shared on social media, we may not have the ability to remove images, and although every reasonable effort will be made, we have no control over how images/media is distributed on other social media sites. NIWE is not to be held responsible for any third parties sharing information or images.</p>

<p>Historic data</p> <p>Archived records, i.e. those of people who no longer use our services or with whom we have lost touch.</p> <p>This may include special categories of data as specified above.</p>	<p>We hold this information because we know people often use NIWE's services more than once, and it is helpful for us to have information on the support you have had in the past if you request our support in future.</p>	<p>Archive records are kept on our secure database for 7 years. If we have not heard from you within 7 years they are securely deleted.</p>
--	---	---

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.

To provide some of our services, we need to collect and process additional information about you. We will always make it clear when we are doing this. This could include, but is not limited, to the following:

Training

If you attend our training, we will need to take more detailed information about your role and workplace. This information is kept with your record in our secure database (see above for retention details).

Counselling Service

If you are referred to our counselling service, your counsellor will keep records about your counselling sessions. These are separate and confidential, with only your counsellor and our Counselling and Therapy Services Manager having access. They are confidentially disposed of after seven years.

Volunteering, being an employee or a Trustee

If you choose to volunteer or work with us, then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

8. Who we share your data with

We will not pass your personal contact details to other people or organisations, or discuss details of your role as a parent or carer or the services you receive from us, without first obtaining your consent, e.g. we will ask your permission to refer you to another organisation for additional support or to discuss something with another professional.

However, where there appears to be a clear risk to your or someone else's safety we have a legal duty to contact relevant authorities to address this. Where appropriate, we will inform you before we do so. You can find out more about this in our Safeguarding Policies and Procedures which are available on request.

For some processing purposes we use third party software and systems, which means we need to pass on some of your data to external recipients. The type of information we may share, and for what purpose, includes but is not limited to:

- **Financial information** e.g. if you make a donation, we will need to share some of your information for Gift Aid purposes so that we can make a claim.
- **Contact and monitoring information:** We use third parties to help us process some of our data. This includes but is not limited to: Mailchimp to send newsletters and updates by email; Give as You Live, Just Giving and BT Donate to collect and process donations; Google Analytics for website statistics; and Survey Monkey to collect feedback on our services. Every third party we use is GDPR-compliant.

9. How we store your data

Your personal data is held in both hard copy and electronic formats.

Electronic data, including emails, is stored on our servers, which are located in the UK and on our software suppliers' servers. In addition our secure database provider securely backs up our electronic data and ensures it is disposed of securely when it is no longer needed. Our software and IT providers are GDPR-compliant.

Hard copy data is stored securely in locked offices and storage spaces within NIWE's premises. We confidentially and securely dispose of all hard copy data.

10. Cookies on our website are covered by a separate policy.

11. Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

a. **Withdrawing consent**

If we are relying on your consent to process your data, you have the right to withdraw your consent at any time.

b. **Exercising your rights, queries and complaints**

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Lead Ann Dymyd at NIWE.

c. **Complaints to the Information Commissioner**

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

12. Signature of the person with overall responsibility for the implementation of this policy:

A handwritten signature in black ink, appearing to read 'AD', written over a horizontal line.

Ann Dymyd
Chief Executive

Date: 24/05/18

Related Documents:

- Confidentiality Policy
- Information Governance Policy
- Acceptable Use of IT Policy
- Safeguarding Policies and Procedures