

## **TOWER HAMLETS FRIENDS AND NEIGHBOURS CLIENT PRIVACY NOTICE**

### **HOW WE USE YOUR INFORMATION**

As the provider of befriending and other services to you, Tower Hamlets Friends and Neighbours (THFN) needs to collect, hold, and use information about you. Some of this information is personal data. This means it can be used to identify you. The law gives you rights around what happens to this personal information

This Privacy Notice is for current clients, potential clients who are referred to us, and former clients. It tells you who we are, what information we will collect, how we will use it, and who we will share it with.

#### **1. Who we are**

We are Tower Hamlets Friends and Neighbours (THFN) of St Margaret's House, 21 Old Ford Road, London, E2 9PL. We are a charity which provides befriending and advocacy services to vulnerable older people in Tower Hamlets.

THFN is a Data Controller registered with the Information Commissioner's Office

If you have any concerns about how we use your information, or wish to exercise any of your rights set out below, you should contact the Operations Manager on 020 8983 7979

#### **2. Why we need to collect, hold and use personal information**

We need personal information about you in order to decide whether we are able to accept you as a client, to provide the befriending and other services we agree to supply, and to ensure that those services continue to meet your needs. We also need information about clients to use in an anonymised format when we make applications to potential funders or report to funders on the use of their money.

Some of the personal information we need to collect and use is more sensitive information, for example, about your health or ethnic origin. When we need such information, we will seek your express consent.

### **3. The information we process about you**

The information we collect, hold and use about you may include:

Contact details, such as;

- Name
- Address
- Telephone number
- Email address

Other information about you, such as

- Date of birth
- Gender
- Nationality
- Ethnicity\*
- Languages spoken
- Living arrangements, including whom you live with
- Next of kin or alternative reliable contact
- Access arrangements
- Health and safety issues
- Care packages
- Other organisations working with you
- GP details
- Health
- Services received, including outings attended and advocacy
- Hobbies/interests
- Preferred activities with Befriender
- Records made by Befriender of visits/telephone discussions

\* It is helpful to have information about your ethnicity but if you prefer not to provide it, you can still access our services, apart from services designed to meet the needs of specific ethnic groups.

Photographs

We like to use photographs of clients to illustrate our work, but we will only do so with your consent – see below.

### **4. How we collect information**

Most of the information we collect about you is provided by you either when you become a client or in subsequent decisions with your befriender or another member of THFN staff

Information may also be provided by the person who referred you to THFN, or occasionally by your GP or a health or social worker, or by your next of kin or other member of your family.

## **5. How we use your personal information**

- To decide whether we are able to take you on as a client
- To provide services to you and to ensure they meet your needs
- To keep in touch with you
- To provide information in an anonymised or aggregated format to potential funders and in reports to funders
- With your specific consent, to develop stories about the people we help to raise awareness and understanding of our work
- To monitor the take up of our services and to help us provide culturally appropriate support to our clients.
- To tell you about THFN and its activities
- With your specific consent, to signpost you to other services or activities.

## **6. Disclosure of your information**

We may share your personal information with:

- All the staff of THFN for the purposes described in this notice
- Your GP or other health worker (with your consent)
- Your next of kin or primary contact (only if we have concerns about you and with your consent)
- The emergency services or other appropriate authorities if we have serious concerns about your well-being
- Funders and potential funders (in an anonymised or aggregated format)
- Any third party to meet legal or regulatory obligations or in the context of legal proceedings
- With your specific consent, other providers of services to inform them of your potential interest

With your specific consent, we may use stories about the people we help based on data you have supplied in our funding applications or reports, or in our publicity on our website or elsewhere to raise awareness of our work and seek support for it.

With your specific consent, we may publish your photograph on our website, social media or promotional materials.

## 7. Legal basis for processing personal information

Data protection laws require us to explain what legal grounds justify our processing your personal information. For some processing, more than one legal ground may be relevant.

These are the grounds relevant to THFN:

**Contract:** processing your personal information is necessary to enable us to consider whether we are able to take you on as a client and, if we do, to fulfill the services agreement we enter into with you. We need this information to determine what services you require, to deliver and manage those services, to review the services and to adapt them to your changing needs.

**Legitimate interests:** Processing of the personal information that we hold about you is necessary for the purposes of the following legitimate interests pursued by THFN:

- Managing the charity's activities, including developing new services and ensuring that we provide culturally appropriate support to our clients
- Raising funds needed to support the charity's activities and reporting to donors on the use of their money
- Raising awareness of the charity's work

Personal information is used to raise funds, report to donors and raise awareness only in an anonymised or aggregated format from which the information relating to you personally could not be identified.

**Compliance with legal obligations:** Occasionally, we may need to process your information to meet a statutory obligation or in relation to actual or threatened legal proceedings.

**Consent:** Any sensitive personal information (such as information about your health, or ethnicity) may only be used with your consent. We will make clear what information may only be used with your consent but if you do not agree to the processing of certain information (i.e. health), we may not be able to continue to provide a service to you. We will only use a photograph of you, or a story about you, with your consent.

**Vital interests:** If your life is at risk, and you are unable to give consent, we may provide information about you to your GP or the Emergency Services to protect your vital interests.

## **8. Data retention**

If you become a client, we will retain personal information about you for up to six years after you cease to be a client of THFN, and we may retain it for a further period if it is necessary to resolve any outstanding issues.

If you are referred to us but not taken on as a client, we will retain your information for not more than 6 months unless there are any outstanding issues.

## **9. Security and storage of information**

We will store your information securely in computer systems and occasionally in paper files kept in locked filing cabinets. When we no longer need your personal information, it will be disposed of in a secure manner.

## **10. Your rights**

You have the following rights:

- To be informed about how we obtain and use your information
- To ask for a copy of the information we hold about you
- To have inaccurate or incomplete data put right
- To request us to restrict processing of your data.
- To object to the processing of your information for certain purposes such as direct marketing or the charity's legitimate interests
- To have your personal data erased in certain circumstances when there is no compelling reason to continue processing it
- To have your information returned to you, or sent direct to another company, in a machine readable format (data portability)
- Where the use and sharing of personal information is based on your consent, to withdraw that consent at any time.

If you withdraw your consent to the use of personal information, we may no longer be able to provide services to you. If you are considering withdrawing your consent, we therefore suggest you should first discuss your concerns with your befriender or the Operations Manager.

If you wish to exercise any of these rights, you should contact the Operations Manager on 020 8983 7979.

We will not normally charge a fee for meeting requests but reserve the right to charge a reasonable fee to cover our administrative costs if the request is manifestly unfounded or excessive.

## **11. Questions and Concerns**

If you have any questions about the way we collect, use or share your personal information, please speak to Operations Manager on 020 8983 7979

If you have any concerns about the way in which THFN has handled your personal information, you may contact the independent Information Commissioner's Office at <https://ico.org.uk/concerns/>. Go to <https://ico.org.uk/concerns/> for more details or phone 0303 123 1113.

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