

## **Women's Therapy Centre (WTC) Privacy Policy**

### **Why this policy?**

This is a requirement under new legislation called the General Data Protection Regulations, which governs:

- when and why we collect personal information about you
- how we use the information
- when we may disclose it to others
- how we keep your information safe and secure
- your rights and choices in relation to your information

### **How do we collect information from you?**

We may obtain information about you in the following ways:

#### **You give us information directly**

This will usually be if you refer yourself to WTC for therapy, or when you first come to the Centre for an assessment. At this stage you may fill in our 'opt in' form and send it to us by email/post, or you may fill in forms when you attend the centre.

You may also give us information if you attend an event, for example a workshop or activity we are running. This could be at the Centre or in another community venue. On such an occasion we may ask you to complete a register of attendance, or to sign up to a mailing list.

#### **You give us information indirectly**

Your information is sometimes shared with us by another agency or a medical or other professional. The agency may be a voluntary organisation/charity, or part of the NHS or another body. The professional may be a GP, mental health or social care professional, or someone from a voluntary organisation/charity.

If this happens – your information is shared with us by a third party – it will usually be so they can make a referral to WTC on your behalf.

You should make sure you ask to see the privacy policy of the other agency, on any occasion when you give data to a third party.

#### **When you visit our website & social media**

Our website automatically collects information, including your IP address, the pages you visit, how you found our website.

Similarly when you interact with our Facebook page, Twitter and other social media, information is automatically obtained, depending on the privacy settings you have set yourself on these platforms.

We do not use information automatically collected via the website or social media for any other purpose.

## **What type of information do we collect from you?**

The personal information we collect and use includes:

- your name and home address
- your email address and phone number
- your date of birth
- your GP's contact details
- any other personal information you share with us your bank or card details (if you make a contribution to your therapy, or make a donation to WTC)
- data about your health, ethnicity and religion (sensitive data)

We protect all your information carefully. Sensitive data is protected even more carefully, and is only gathered when there is a clear and valid reason for collecting it.

We will always be clear about why we are collecting your information and data, and what we are using it for.

## **How and why is your information used?**

In the main, we only use your personal information to enable us to provide therapy and other services to you, which you have requested.

We only use your bank or card details to enable us to take the specific payment you have authorised on that occasion.

We may occasionally use your information to send you communications you have indicated you would like to receive.

We may occasionally use your information to seek your views or comments on our services, or to tell you about changes to our services.

We use personal information from candidates who have applied for jobs with us, or volunteering opportunities.

There may, rarely, be other situations, not listed above, when we need to use your information. We will discuss this with you and get your permission, at the time.

## **How long do we keep your information?**

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time varies, depending on the reasons we collected the information, and whether you are still in touch with WTC. For example, if you continue to receive services from WTC we will retain your information during that time.

There are operational and legal considerations which affect how long we retain your information. We are always willing to discuss this with you if we need to.

## Who has access to your information?

Staff in WTC – your therapist, link worker, the CEO, volunteers – have access to your information within the organisation. However we operate on a 'need to know' basis, which means we do not share identifying information about you, within the staff team, unless we specifically need to, in order to provide you with services and support.

We only share **your personal** information with third parties (other organisations or professionals) in these situations:

- you have given your written permission for us to do so (usually to enable us to make a referral to another organisation for support)
- you have already given your information to a third party, with whom we have a contractual relationship to deliver services to you
- we have legitimate concerns about your safety or about the safety of another individual with whom you are connected

In the first situation we will always obtain your written permission to share your information.

In the second situation you have already given your permission to the third party, but we will ensure you give your permission separately to us, to enable us to keep and process your data.

In the **third** situation we consider we have **vital interests** and in this situation we reserve the right to share your information in order to ensure your safety or that of someone else.

## Anonymised data

In some situations, usually as part of a contractual relationship with a funder, we are required under the contract to provide data to evidence that we have met the terms of the contract, and for monitoring purposes. In this situation we will ensure your data is anonymised and therefore you cannot be identified.

## Lawful processing

The new GDPR legislation says we need to be sure that we have at least one ground or reason for processing your personal information.

In most cases the ground/reason is to enable us to provide you with services and support that you have requested.

We will always consider and make sure we have the following, to ensure we are processing your data lawfully:

- **specific consent** from you to use your personal information
- **legitimate interests** to use your personal information
- **vital interests** – if we go outside the usual permissions (as above)
- **legal obligation** – for example we are ordered by a court of law or a regulatory body to process your data

In all cases, where we process your data, we will consider and balance any potential impact on you (both positive and negative) and your rights under law.

When we use sensitive personal information – e.g. about your health, ethnicity, religion – we need an additional legal basis to process this data. This will usually be your explicit consent, or if there are vital interests, or some other overriding legal reason.

### **Fundraising and marketing communications**

Rarely, WTC sends out fundraising and marketing communications. If we do, we will only contact you if we can demonstrate a **legitimate interest** to use your personal data, and have your explicit prior consent.

In the event we ever send you emails or communications you do not want to receive, we will enable you to opt out of any future emails immediately.

### **Your rights in relation to the data we hold**

Under GDPR and UK data protection law, you have rights over the information we hold about you. These are the main ones:

#### **Right of Access to your data**

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide this to you unless legal exceptions apply (we will tell you if this is the case.)

If you want to see what information we hold on you, please write to our Chief Executive at 10 Manor Gardens, London N7 6JS, and include proof of your identity.

#### **Right to have inaccurate personal information corrected**

The accuracy of your information is important, and if you suspect or know we have any inaccurate information about you, then you can ask for it to be corrected. You should, in the first instance, ask your therapist or WTC worker to correct the inaccurate information. Or you can phone the WTC office during office hours, on the usual phone number, or email us using the usual address.

#### **Right to restrict use of your data**

You have the right to ask us to restrict the processing of some or all of your personal information, if there is a disagreement about its accuracy or if we are not lawfully allowed to use it.

#### **Right to be forgotten**

In law you can ask us to delete some or all of your personal information. We will do this as far as we are required to. In many cases we will anonymise the information, rather than delete it, in order to be able to continue to work with you.

#### **Right for your personal information to be portable**

We store and process information on a bespoke WTC database. If you want to, you can ask us too provide the information we hold to you or to another service provider, in a suitable, portable format,

### **Right to object**

You have the right to object to processing where we use your personal information (1) based on legitimate interests (2) for direct marketing or (3) for statistical research purposes.

In all cases you exercise your rights you may first speak to your therapist or WTC worker. You are also free to contact the WTC office, on the usual phone number or email. You may also write to the Chief Executive at WTC, 10 Manor Gardens, London N7 6JS.

### **Keeping your information safe**

When you give us your personal information we take steps to ensure appropriate controls are in place to protect it. We store data on a database called Core Net, and we also keep some paper files.

The database can only be accessed by WTC staff who have personal 'fobs' which allow them into the database. The paper files are kept in lockable filing cabinets, which are secured at the end of the day and when the office is not open.

When information is 'forgotten' from the database we delete the record concerned.

Paper information is destroyed by being shredded onsite at WTC.

### **Changes to this policy**

This policy has been prepared to ensure we comply with the new GDPR legislation, which comes into force in May 2018.

The policy will be reviewed regularly, as needed. Revised policies will be posted on our website.

### **Review**

Unless it is revised before then, this policy will be reviewed in May 2019.

Appendices: Consent Form 2018