



THE NATIONAL HOUSE PROJECT

Privacy Policy

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1. Introduction

The National House Project is a registered charity (charity number 1179743). Our registered address is; The National House Project, Couzens Building CO3A, Crewe Green Road, Crewe, Cheshire, CW1 5DU.

This Privacy Policy explains how we may process the personal data you provide to us in accordance with the General Data Protection Regulation (GDPR). Any personal information shall be processed in accordance with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Further details of which are available from the Information Commissioner's website: www.ico.gov.uk

By submitting your information to us, you consent to the use of that information as set out in this policy.

We understand the value we all put on our personal data, which is why we're careful to protect the information we hold and keep check to ensure we only hold the data we need.

What follows is an overview of how we look after your information and why. We're also happy to answer specific questions you may have. Please email us via enquiries@thehouseproject.org

2. Revisions

This policy was last updated in September 2021 following the introduction of the new Outcomes and Learning Framework.

3. Privacy Principles

We will never sell or swap personal data.

Only members of the NHP, or data processors working on behalf of the NHP who need information to do their job can access information in respect of data subjects.

- Data subjects can change their communication preferences or opt out altogether whenever they choose.
- We're especially sensitive when engaging vulnerable children and adults through our services, fundraising or policy, campaigns and communications activity.
- We work hard to safeguard your information through security policies and protocols.
- We recognise that data protection is an ongoing commitment, not a one-off policy.

4. When will we process your information?

We will process personal information (e.g. your name, number or address) from you when you:

- Enquire about or access our advice and support services
- Are a young person who signs up to be a member of a Local House Project
- Are a staff member within a Local House Project, or senior manager within a Local Authority that has a House Project
- Engage in our policy, campaigns and communications activity
- Share your views with us through research or consultation work
- Enquire about or book our training and/or consultancy services
- Donate or commit to make a future donation
- Enquire about or sign up to a fundraising event/conference
- Apply to volunteer or work with us
- Are a partner, supporting the work of Local House Projects.

5. How do we process your personal information?

The personal data of young people in Local House Projects comes from Local Authorities via their House Project staff.

However, we also process other data about staff, partners, consultants and supporters. In this case, almost all the data we process comes directly from the data subject. This means that they can decide what data we hold, and why, from the very start. In the main, data subjects are most likely to have been in touch via our website or email first, but we also start data processing if we speak on the phone or even have face to face contact.

If you donate to us, it is likely that you will have noticed we use third-party companies, such as JustGiving, to collect and process personal data on our behalf. Third party companies only provide us with your data if you have given them permission to do so. Otherwise, your information is anonymised before it is passed to us.

6. What information do we process?

If you are a young person within a Local Authority, we process the following data:

- Name, date of birth, address, email address. This information is gathered for the purpose of accessing the House Project Programme (HPP), but also enables us to send celebration cards. You will consent separately to the sending of celebration event cards and the newsletter upon accessing the HPP. There will also be a record of those young people who are part of CLNM.
- Photographs and films. This has explicit consent attached when you sign up to the HPP for use of these images for publicity or social media purposes.
- Other data fields are collected for the purpose of performance reporting. This data is recorded in an obfuscated format (we cannot see this information that relates specifically to you but enables your Local House Project and the National House Project to report on this information). This includes demographic details including information about your gender and ethnicity, health information, education information, care information (including your legal status and placement type), and key dates including the date you joined your House Project and date you identified your first property.
- Whilst this data is obfuscated, we do have the ability to override this obfuscation in order to provide technical support and assistance to your Local House Project. We will only do this at the request of your LHP and a record is kept of this, as well as an alert sent to your LHP staff when this happens.
- Only team members within directly relevant service lines will have access to the otherwise restricted files.

If you are a member of Local House Project staff, we process the following data:

- Name, job role, contact number, ethnicity and email address used to provide log-in to the Outcomes and Learning Framework (OLF) and HPP.

- Photographs and films with your consent, which may be used for social media purposes.

If you are a member of National House Project staff (including consultants), we process the following data:

- Name, job role, date of birth, address, ethnicity, bank details, paygrade, salary, National Insurance number (*NHP staff only*) – for the purpose of processing payroll information.
- References.
- NHP employees will be asked to undergo a DBS check. The DBS check process is set out by the Disclosure and Barring Service, a government body. This process includes specifying what proof of ID and address information is required. We will take a copy of your identification documents as part of this process which may include your passport and/or driving licence
- Photographs and films with your consent, which may be used for social media purposes.
- Vehicle details and proof of class 1 business use insurance.
- Only team members within directly relevant service lines will have access to the otherwise restricted files.

If you apply for a role within NHP, we process the following data:

- Application forms and CV's for job applicants (kept for a period of 6 months).

If you volunteer for us, we process the following data:

- DBS information. The DBS check process is set out by the Disclosure and Barring Service, a government body. This process includes specifying what proof of ID and address information is required.
- Your CV and references. Both such documents along with your volunteer application form are retained for at least the lifespan of your engagement within NHP. Only team members within directly relevant service lines will have access to the otherwise restricted files.

If you are a Trustee, we process the following data:

- Name, job role, date of birth, address, email address, telephone number for the purposes of charity records and correspondence.
- Only team members within directly relevant service lines will have access to otherwise restricted files.

If you are a Fundraiser, we process the following data:

- We store personal information on our fundraising database. The secure database is only accessible by the CEO, Director, Fundraising and Partnerships Manager and Systems Administrator. At a base level, we aim to collect your name and address. This is because we cannot match past or future donations to the same person by name alone and because, should you complete a Gift Aid declaration, HMRC requires full name and address details for a claim to be valid.
- We also ask for email addresses because it's a cost-effective way for us to keep in touch. We try to compliment postal communication with email communication, but only if you have told us you're happy for us to email you.

- It is important that donors let us know if you move house, even if you have opted out of receiving letters. This is because your Gift Aid declaration is only valid if matched against a current address and we do not currently pay for Royal Mail's National Change of Address service.
- We will take note of where you work if you tell us. The fundraising team are hoping to increase the number of corporate supporters of NHP and know the most effective way to do so is by galvanising internal champions who are already committed to the cause.
- If you opt to donate via Standing Order we maintain a record of your bank account as payments are made direct. This, and all fundraising information, is held on a password protected database, with limited users and different user levels.
- In cases where we may need to transfer or process your personal information outside the European Union we will comply fully with our legal obligation.
- If you're taking part in an event for us, we may ask for emergency contact details. We will never contact that individual for any other reason without their express permission and we will destroy that information once the event(s) is complete.
- If the fundraising team understand that you could make a large donation, they may run a search on sites like Google, Companies House and LinkedIn for publicly available information to get a better view of your capacity to make a donation, your interest in supporting children in care, as well as your networks. The fundraising team also try to make sure that there isn't anything they should be aware of that may harm the reputation of the charity by association. The resulting profile is stored on the fundraising database.

7. Cookies and analytics

More generally, we look at information on our websites (www.thehouseproject.org and www.clnm.co.uk), to see what pages people visit the most or which link in an e-newsletter was the most popular. We use Google Analytics to help us better understand how our website is used. This enables us to look at aggregate data and identify patterns or trends. In the main, we use anonymised, aggregate data, but Google Analytics does provide access to IP addresses.

To find out more about how we use information from our website, please access our online privacy statement using the following link:

<https://thehouseproject.org/privacy-policy>

8. Sharing your experiences

Case studies, quotes and stories can help increase understanding of life in and leaving care and how the care system works. Sharing personal experiences is a powerful communication tool but we respect your right to privacy and recognise the emotional impact which sharing personal experiences can have. We support young people who want to share their personal experiences with us and others, but never make this a condition of accessing our support. We also advise and support young people in deciding how much information to share. We will never share a young person's story without their express permission to do so.

Images (photo/video) would only ever be used with the express consent of the subject for use in online and offline publications, including social media.

Case studies and quotes provided for policy and research activity are typically anonymised, with names and identifying information changed unless you have expressly consented for us to use your real name. We do not otherwise alter the facts of any story.

Case studies about fundraisers and donors are typically not anonymous so we seek express permission to use a supporter's story before publishing.

9. Supporters

We know people support our work for a variety of reasons. It helps us in the fundraising team to understand what those reasons are, so we can communicate with you in an appropriate way. For example, if you support our work because you have direct experience of the care system, you probably won't find much value in a letter explaining to you what it is – you already know.

But for us to communicate with you the right way, we do need to have an accurate picture of who you are. This means we may ask you to let us know what motivated you to donate, or how you feel about our work. The information you provide offers insight that we analyse to plan our activities and communications.

We may also look at publicly held information through the Charity Commission, Companies' House, media stories and Google, to better understand you and your philanthropic priorities so that we can be sure that a charity supporting care leavers is something that would be of interest and that our value base is aligned.

10. What do we do to protect your data?

We ensure there are clear standard operating procedures in place for handling data. This includes limiting access to personal data to individuals who must log in with a unique username for access, and also features two-factor authentication.

We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line from improper access, use, alteration, destruction and loss.

How to best protect yourself and your personal information

To protect yourself when sending us sensitive information, please ensure that you use devices running supported operating systems that are regularly patched and incorporate some form of malware protection. Only connect your devices to networks that you trust.

Securing your passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts our website, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.

All passwords will be encrypted, and no one will ask for your password.

We ensure the software, hardware and underlying operating systems are patched with the latest security implementations and use end-to-end encryption (SSL) to ensure the safety of data in transit. We challenge and review our processes on a regular basis to keep step with changing technology and expectations.

All transactions, and the user that performed them, are audited within the system to ensure a transparent trail of access and updates can be reviewed at any point. This ensures that the users are responsible for their use of the system when dealing with sensitive.

Whilst we strive to protect your personal information, due to the nature of the internet we cannot totally guarantee the security of any of the information you transmit to us. With this in mind, transmission is at your own risk and we urge you to take every precaution to protect your personal information whilst you are online.

11. Your choice

You have a number of rights in relation to your data.

To be informed - This Privacy Notice provides the information you are entitled to receive

Access - You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for automated decision making.

You can make a request free of charge. Please make all requests for access in writing and provide us with evidence of your identity. Please make a request in writing to by writing to enquiries@thehouseproject.org or Data Protection, NHP, Couzens Building CO3A, Crewe Green Road, Crewe, CW1 5DU.

Rectification - You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure or right to be forgotten - You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent or where we have no lawful basis for keeping it.

You can opt out of fundraising or marketing communications at any time by [unsubscribing here](#), OR contact enquiries@thehouseproject.org or 01270 21588 / 07876 217799 to request that we update your preferences.

It's important to note that we may still have to contact you for administrative purposes. For instance, if your Direct Debit is amended or cancelled at later date, we will write you a letter or email to confirm the action.

Restrict processing - You can ask us to restrict the personal information held about you where you have asked for it to be erased or where you have objected to our use of it.

Data Portability - You can ask to provide you or a third party with some personal information that we hold about you in a structured, commonly used, electronic form so it can be easily transferred.

To object - If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority.

Not to be subject to automated decision-making including profiling
- We do not use any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request

12. Legal Basis

The legal bases that we rely on for processing your personal data are.

You have provided your **consent** to us using your personal data for a specific purpose:

- We will ask for your consent to use your personal data to send you marketing emails and SMS. There will always been the option within these emails to unsubscribe.
- We will ask for your consent to use your images or films for the purposes of marketing and social media.
- We will ask for your consent to contact you on birthdays or during specific celebration events.
- You always have the right to withdraw your consent to the above at any time.

It is necessary in connection with the **performance of a contract** with you:

- Sometimes it is necessary to process your personal data so that we can provide contractual relationships with you. For example, if you volunteer or work for us.

It is necessary for compliance with a **legal obligation** to which we are subject:

- This would include where we must retain certain records, for example, to manage health and safety, for the detection and prevention of crime, safeguarding obligations, for maintaining suppression lists to ensure we comply with marketing laws, for tax reasons (such as those related to Gift Aid donations) and undertaking due diligence before accepting certain donations or entering certain relationships.

It is within our **legitimate interests**.

- Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (if the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for your

consent, and where we are confident that this will not impact your rights.

- Our legitimate interests include raising funds for a wide range of activities to support our charitable objectives. We also have a legitimate interest in publicity and income generation, campaigning and fundraising to support these objectives and undertaking due diligence to establish the provenance of donations that are made, or may be made, to us.
- Where you have provided your details to us, we may contact you by post and phone for certain marketing and fundraising activities (but we will explain this to you at the point that we collect your details). You can opt out of this activity at any time by emailing us on enquiries@thehouseproject.org.
- We will also rely on our legitimate interests for the proper administration of NHP, and to manage our operations (for example, maintaining appropriate records and databases, for the detection and prevention of crime and safeguarding all those who access our premises and facilities).
- When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

Please see section above for the limited legal basis for when we process sensitive personal data.

13. Changes to our Privacy Notice

We may update this notice from time to time, as regulation or our internal processes change.

We will note and date significant revisions at the start of this policy. If you wish to be contacted directly in the event of significant changes to the Privacy Notice, please send your contact details and request to enquiries@thehouseproject.org.

If you have any question, comment or suggestions about how we look after your personal data, please contact us by writing to enquiries@thehouseproject.org or Data Protection, NHP, Couzens Building CO3A, Crewe Green Road, Crewe, CW1 5DU.