

Privacy Policy

Introduction

The Boaz Trust is a Christian charity working to end destitution amongst asylum seekers and refugees. Our vision is to see life in all its fullness for people seeking sanctuary in the UK. To find out more about us, see the 'About us' section of our website.

The law on data protection changed in May 2018, when the new EU-wide General Data Protection Regulation (GDPR) comes into force. This new regulation gives you greater control over how information about you is stored and used by organisations like Boaz. We have undertaken an audit of all the personal information we hold at Boaz, and put into place new processes and systems to make sure we are working in line with the regulations. This policy is part of that process.

If you have any queries about our privacy policy please email privacy@boaztrust.org.uk or call us on 0161 202 1056.

Who are we?

The Boaz Trust is a Christian charity serving destitute asylum seekers and refugees in Greater Manchester by providing accommodation and support. We are a charity registered in England and Wales (Number 1110344). Our registered office is at the Boaz Trust, Kath Locke Centre, 123 Moss Lane East, Manchester, M15 5DD.

For the purposes of this Policy, 'us', 'we' and 'our' refer to the Boaz Trust.

What is this policy about?

The Boaz Trust is committed to protecting your privacy and the personal information you provide us with. In line with our values, we want to treat you - and your personal information - with respect and dignity. It is important to us that you have confidence in us as an organisation, and that you trust us to look after your information. This policy explains how we collect, use and store your personal information, and also explains the rights you have under the 2018 regulations.

At Boaz, we have relationships with different people, from clients and supporters to volunteers and staff. For each type of relationship, we collect different personal information and this data might be used and stored in different ways. We have created specific privacy notices providing more detailed information as to how we process your information, depending on the particular connection or relationship

you have with Boaz.

Your rights

Under GDPR, you have 8 specific rights when it comes to your personal information.

1. **The right to be informed**- meaning you should be given clear information about what personal information we keep, why we keep it and how it is used and stored.
2. **The right of access**- meaning you can ask us for a copy of all the personal information we hold about you and you can ask us questions to make sure that we are processing your information legally.
3. **The right to rectification**- meaning that if the personal information we have is wrong or incomplete, you can tell us so that we only keep accurate information that you have chosen to share with us.
4. **The right to erasure**- meaning that you can ask us to erase all your personal information. This is sometimes known as 'the right to be forgotten'. There are some occasions when we may have a legal obligation or legitimate interest to keep certain information about you, even if you no longer want to be on our records, for example in terms of processing financial information, or keeping records in case of a future claim.
5. **The right to restrict processing**- meaning that you can ask us to keep your information but only use it for certain purposes, for example you may want to only receive certain types of information from us.
6. **The right to data portability**- meaning that you can ask for your data to be transferred to another system. This is not something that is currently relevant to our work at Boaz, but an example would be if you use a price comparison website to compare different bank accounts, you have the right to tell your current bank to share relevant information with another account provider.
7. **The right to object**- meaning that if you are unhappy with the way we have processed your data, for example if we keep writing to you when you have asked us not to, you can tell us and we must respond.
8. **Rights in relation to automated decision making and profiling**- meaning that we need to tell you if we use any systems which automatically use your personal information without human involvement. There is more information about this and all the other rights on the [Information Commissioners Office website here](#).

What information do we collect?

We collect personal information, or data, each time you interact with us. For example when you are referred in to our service for accommodation, when you

make a donation, request information, apply for a job or volunteer opportunity, sign up for an event, provide feedback or otherwise provide your personal details.

We collect information from third parties, for example fundraising sites like Give.net or from referral agencies, where you have given your consent. You may wish to check the privacy policies of these organisations to find out more information on how they will process your data.

When you visit our website, we collect non-personal data such as details of pages visited and time and location data. Website usage information is collected using cookies (see the section on Cookies below).

We may collect publicly available information, for example from Companies House, Charity Commission, or information published in newspapers.

What do we do with your information?

Clients – we may use the personal information we collect from you (and / or the organisation who referred you) to:

- arrange an initial contact meeting to understand your situation and find out whether we are able to offer you accommodation and support
- provide you with any services (accommodation and support) we have agreed with you
- share information with other organisations, for example with your original referrer, or with legal or medical services

Our use of your information is always subject to our confidentiality policy and your support worker will explain this to you.

Supporters – we may use the personal data we collect from you to:

- keep you up to date with news and stories about our work
- process any donations you give to us including claiming gift aid on your donations if authorised by you to do so
- thank you for your donations and invite you to continue to support us financially and non-financially, for example through volunteering or praying
- provide you with any information you have requested
- keep a record of your relationship with us

- analyse the personal information we collect about you and use publicly available information to aid our understanding of our supporters to help provide the right information at the right time to the right supporters
- conduct research to aid our understanding of our supporters and their views so that we can improve and develop our services, which may include contacting you to ask for your comments and opinions

We will always do this in compliance with our own Fundraising Commitment and with rules set out by the Fundraising Regulator.

Volunteers and Job applicants - we may use the personal information we collect from you to:

- process and consider your application for a role at the Boaz Trust. Your information will only be shared with our staff involved in the recruitment process
- share specific and appropriate elements of your personal data, for example, your contact details, with other staff team members that you will be working with should your application be successful

Employees – we may use the personal information we collect from you to:

- fulfil our contractual obligations to you, such as paying you
- ensure we are treating you as we've committed to, for example under our sickness absence policy
- provide references at your request should you move on

Sharing your information

Sometimes we may need to share your information, with your consent. We may also have to share information if it is required by a law enforcement agency or by a regulatory body, for example the HMRC for processing gift aid on donations. We do not share your information with any other organisations for their marketing purposes.

We may use other organisations to carry out tasks on our behalf, including processing donations (for example we receive online donations from Stewardship), sending emails (such as using Mailchimp to send our newsletters) and sending text messages (we currently use the Text Local service to send client appointment reminders). We will provide these organisations with only the information needed to deliver these services, and they are not permitted to use or store your data for any other purpose.

We may share your information internally, within the Boaz team, for the purpose of safeguarding, or for example if a staff member needs to query something with you.

Where and how do we store your personal information?

We take appropriate steps to ensure your personal information is managed securely. We store and process most of our information using cloud based systems and secured servers. Internally, this is accessed only by appropriate staff and volunteers who are trained suitably. We restrict access to certain computer drives and files, for example information relating to health and medical information or financial giving.

Some of your information may be stored in hard copy (on paper), for example if you have given us a photocopy of any personal documentation, or signed copies of formal paperwork. We do our best to keep paper copies to a minimum and we store hard copies of these documents in locked filing cabinets with restricted access.

In some cases, third parties may have access to your personal information, and where this is the case we ensure that they are GDPR compliant. Our IT system is managed and supported by a company called Rocksalt, who have administrator rights across our IT system. They have their own privacy policy and are fully compliant with GDPR.

We may use external companies to collect or process personal data on our behalf, for example Mailchimp or Blackbaud eTapestry (our database system). While we take appropriate steps to ensure that information is secure, for example by using encrypted forms, we cannot guarantee that transmission of information over the internet is 100% secure and therefore you submit data at your own risk.

Data in cloud based systems may be processed outside of the European Economic Area (EEA). By submitting your personal data, you agree to this transfer, storing and processing of your information.

Cookies

Cookies are text files that are placed on your computer by websites that you visit. You can find more information about cookies here (www.aboutcookies.org). Most browsers allow you to turn off the use of cookies function, should you wish to.

Cookies may be used to collect information about your visit to our website, for example: the pages that you visit, the time and date of your visit, location and traffic data.

We may collect and use this data for the following reasons:

- To understand the interests and needs of those who visit our website
- To estimate our audience size and patterns
- To support the processing of forms, applications or requests you send to us
- To help us improve and update our website

The Boaz Trust uses third party suppliers such as Facebook, Twitter, Mailchimp, Vimeo and they may use cookies. We do not control these, and we would advise you to

check with these third parties for information about their cookies and how to manage them.

Some of these third parties may be located outside of the UK and the European Union, and therefore they may not fall under the jurisdiction of UK courts. If this is a concern to you, you can change your cookie settings and you can find out more about this from the Information Commissioner's Office (ICO) (<https://ico.org.uk/>).

Links/Other Websites

This privacy policy only applies to the Boaz Trust. The Boaz Trust website contains links to other websites, which are run by other organisations. The Boaz Trust is not responsible for the privacy practices of other organisations, and as a result of this you should read their privacy policies with care.

How long do we keep your information?

How long information is kept for is sometimes called 'data retention'. We will keep your personal information only for as long as we consider it necessary. We have to take into account legal obligations, for example we are obliged to keep details of anyone making a financial donation for 7 years after the gift (and share those details to the HMRC if this is gift aided), accounting and tax considerations and also consider what is reasonable for the activity in question. If you have any questions about this, please contact us in writing using the contact details at the bottom of this Privacy Policy.

Updating your details and preferences with us

Please keep your details up to date with us, for example if you change address or telephone number. When you provide us with personal information, we may use the Royal Mail's Postcode Finder or other available sources to confirm this, for example if we are unsure of what you have written on a form. We do not use these sources to access data that you have chosen not to provide to us.

You can change your preferences for which communications you receive from us, and how we contact you, by getting in touch with us at any time.

By email: privacy@boaztrust.org.uk

By phone: 0161 202 1056

By post: Data Protection Officer, Boaz Trust, Kath Locke Centre, 123 Moss Lane East, Manchester, M15 5DD.

Accessing and amending your information and preferences

At any time, you can do the following:

- ask for a copy of the personal information we hold about you (this is also known as a Subject Access Request – please see the Appendix for our SAR policy)
- ask us to erase or remove all your personal information
- ask us to restrict how we use your personal information
- object to our use of your personal information

Your request does not need to be in writing but we may ask you to complete a form or submit details in writing (either on paper or in an email is fine) if this will help us deal with your request. The more detail you are able to include the better we'll be able to respond.

To do any of these, please write to us at:

By email: privacy@boaztrust.org.uk

By post: Data Protection Officer, Boaz Trust, Kath Locke Centre, 123 Moss Lane East, Manchester, M15 5DD.

We will act on any requests received at the latest within one month of receiving your request, unless this request is complex, in which case we will inform you within one month of receiving your request and explain why we need to extend this length of time.

Vulnerable persons and children

The Boaz Trust takes seriously the importance of identifying and supporting people who are known to us and who may be in vulnerable circumstances. Boaz staff are trained to do this appropriately in accordance with our Safeguarding policy and Vulnerable Supporters policy and guidance. If you wish to view a copy of these documents, please contact us.

We only support and accommodate adults aged over 18. We do not actively seek to collect children's data. If you are a Boaz supporter and are aged 16 or under we would ask you to please gain the permission of a parent or guardian before you provide the Boaz Trust with any personal information.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you.

By email: privacy@boaztrust.org.uk

By phone: 0161 202 1056

By post: Data Protection Officer, The Boaz Trust, Kath Locke Centre, 123 Moss Lane East, Manchester, M15 5DD.

For more information about your rights in relation to the information we hold about you, you can visit the ICO website (<https://ico.org.uk>).

About this Policy

Our Privacy Policy may be amended and updated, and so you may wish to check it whenever you share personal information with us. If we do amend this privacy policy, the most recent version of it will always be available on our website. We may not explicitly inform our users of these changes. Updates are listed below.

Change Log

April 2018: Policy v.1 Launched

2nd May 2018: Policy v.1 Amended – Specific information regarding Gift Aid added to the 'How long do we keep your information?' section.

11th May 2018: Added Employee, House Owner, Interpreter & Sole Trader, Job Applicant and Volunteer Privacy Notices to appendix.

18th May 2018: Added Trustee Privacy Notice and an amended Employee Privacy Notice retention of date.

30th May 2018: Added DPO references to Trustee, Sole Trader & House Owner PNs

12th November 2018: Edited to recognise GDPR is now live, amended guidance on making a rights request, Privacy notices removed from appendices

Appendices

Subject Access Request Policy

Introduction

You have the right to ask for a copy of the personal information we hold about you at any time. This is formally called a Subject Access Request.

How to make a subject access request

If you would like to ask for a copy of the personal information that we hold on you please contact us in writing:

By email: privacy@boaztrust.org.uk

By post: Data Protection Officer, The Boaz Trust, Kath Locke Centre, 123 Moss Lane East, Manchester, M15 5DD.

Including specific details of the data you wish to see in your request will enable us to respond more efficiently. We may need to contact you for further details on your request if insufficient information is contained in the original request.

Requests may be made by you personally or by a third party e.g. a solicitor acting on your behalf. We will request evidence that the third party is entitled to act on your behalf if this is not provided at the same time as the request is made.

Before supplying the data (where appropriate) we may contact you asking for proof of identity. You must produce this evidence for your request to be complied with.

What happens next

We will act on any requests received at the latest within one month (30 calendar days) of receiving your request, unless this request is complex, in which case we will inform you within one month of receiving your request and explain why we need to extend this length of time.

Wherever possible we will ensure you receive the information requested, in writing, and within 30 calendar days.

There is no charge for this (unless the circumstances are unusual).

If you are not happy with our response

For more information about your rights in relation to the information we hold about you, you can visit the ICO website (<https://ico.org.uk>).

Subject Access Requests: unusual circumstances

Your request will normally be complied with free of charge but we do need to make

you aware that we may charge a reasonable fee in unusual cases. If the request is manifestly unfounded, excessive, or if it is repetitive, or if you request further copies of the same information a fee may be charged. The fee charged will be based on the administrative cost of providing the information requested.

Refusing a request

In rare cases we may refuse a subject access request; if it is manifestly unfounded or excessive, or if it is repetitive. In these circumstances, we will write to you without undue delay and at the latest within one month of receipt to explain why we are unable to comply. You will be informed of the right to complain to the Information Commissioner and to a judicial remedy.