



Executive Summary

The Group consists of Staying Put which is the parent body and Solace Housing Association ("Solace") which is its subsidiary. Solace Housing Association has adopted a large proportion of the Staying Put Group policies and procedures with the aim of ensuring it is compliant with the regulatory standards. Where existing Group controls are felt to be noncompliant with RSH requirements, the subsidiary has created its own policies, which will supersede those of the Group. In such cases the Group will aim in future to apply Solace HA's policies across the Group to ensure that the highest standards are maintained.

Policies and procedures are in the process of being reviewed, with a number of new policies being created specifically for Solace HA. For those areas where Solace HA will aim to follow the Group structure, it is imperative that the Group ensures these are of the standards required for RPs.

PART ONE – POLICY STATEMENT

Staying Put is committed to safeguarding your privacy. At all times we will respect any personal data you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy ("Policy") sets out our data collection and processing practices and your options regarding the ways in which your personal information is used.

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal data. We may update this Policy from time to time without notice to you, so please check it regularly.

The provision of your personal data to us is voluntary. However, without providing us with your personal data, you will be unable to sign a petition, start a petition, donate, sign up to our running events, apply for employment with us or apply to volunteer with us.

How and why will we use your personal data?

Personal data, however provided to us, will be used for the purposes specified in this Policy or in relevant parts of the website.

We may use your personal information to:

- (1) Enable you to use and/or access all of the services we offer;
- (2) Send you information about our work, campaigns, organisations and any other information, products or services that we provide (this will not be done without your consent);

- (3) Provide you with the services, products or information you have requested;
- (4) Improve your browsing experience by personalising your interaction with our website;
- (5) During recruitment and selection
- (6) Handle the administration of any donation or other payment you make via credit/debit card, cheque, standing order or BACS transfer;
- (7) Collect payments from you and send statements and/or receipts to you;
- (8) Handle the administration of your employment and/or volunteering application;
- (9) Conduct research into the impact of our campaigns;
- (10) Deal with enquiries and complaints made by or about you relating to the website or us in general;
- (11) Make petition submissions to third parties, where you have signed the petition and the third part is a target of the campaign to which the petition relates; and/or
- (12) Audit and/or administer our accounts.

We collect information about you:

- (1) When you give it to us DIRECTLY -You may give us your personal data in order to start a petition, sign a petition, when you share information about a petition from our website on Facebook, Twitter and/or via email, when you apply for employment with us, when you apply to volunteer with us, when you contact us by phone, email or post for information or a service and/or when you donate money to us.
- (2) When you give it to us INDIRECTLY - Your information may be shared with us by, others including users of our services, independent event organisers, other fundraising entities, sponsors and supporters of our organisation and services. Your information will also be shared with us if you follow us or otherwise interact with on or via Twitter, when you like and/or join our page on Facebook or interact with us in other ways on or via social media channels.
- (3) When you give permission to OTHER ORGANISATIONS to share your personal information it or it is AVAILABLE PUBLICLY. We may combine information you provide to us with information available from external publicly available sources. Depending on your privacy settings for social media services, we may also access information from those accounts or services. We use this information to gain a better understanding of you and to improve our communications and fundraising activities.
- (4) When you visit our WEBSITE -We use cookies to identify you when you visit our website and to enable us to personalise your online experience (for example by remembering your log in details). Find out more in section 5, Google Analytics, Use of Cookies

What information do we collect?

We may collect, store and use the following kinds of personal data:

- (1) We will typically hold your name and contact details, including physical address, telephone number and e-mail address, and social media identity. However, we may request other information where it is appropriate and relevant, for example

- Details of why you have decided to contact us/start/support a petition, or
- Your bank details or debit/credit card details;
- Details of campaigns you have supported, details of topics/areas of interest to you, responses to surveys you have completed

(2) information about your computer and about your visits to and use of this website including your IP address, geographical location, browser type, referral source, length of visit and number of page views;

(3) information about the services you use, services and products of interest to you or any marketing and/or communication preferences you give; and/or (4) any other information shared with us as per clause 1.

Do we process sensitive personal information?

The law recognises certain categories of personal information as sensitive and therefore requiring more protection, including health information, ethnicity and political opinions. In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent.

Supporter research/profiling

We may use your personal information to undertake research to gather further information about you from publicly accessible sources (as per clause 1 above). This helps us to get a better understanding of your background, interests and preferences in order to improve our communications and/or interactions with you, to help ensure they are targeted to be relevant and appropriate, and to provide information (sometimes through third parties) about petitions and other aspects of our services which we consider may be of interest to you.

Google Analytics

We may use some of your personal information to analyse our digital performance, for example to see how our website can be improved, to record how you are using our website or to assess the popularity of marketing campaigns.

You can opt-out of the collection of information for such purposes here:

<https://tools.google.com/dlpage/gaoptout?hl=en>

Use of Cookies

Our website uses cookies to enable us to understand how people are using our website.

What is a 'cookie?'

A cookie is a computer code which a website transfers to your computer's hard drive. This code enables the website to remember you and your preferences.

What information is included?

It includes information such as a unique identifier- usually a randomly generated number, the name of the website you've visited and how long this information will remain on your hard drive.

How are cookies used?

Cookies are used to improve your experience when visiting websites. They make sure websites recognise you when you return to their site and store any visitor preferences. They're also used to find out how to improve the site for users.

Can they identify me?

No. Cookies can't identify you personally unless you give personal information such as filling out an application form. Even then, cookies only know what you've told them. It's important to note that cookies can't access personal information stored on your computer.

What cookies do you use?

Google Analytics - see above

X (Twitter) Analytics - These cookies may be set through our site by our advertising partners and used by us to measure our marketing activity.

Session cookies - We use session cookies which store information such as a session identification, but it doesn't personally identify you and is deleted when you close your web browser.

Can I delete cookies from my own computer?

To delete cookies, just clear the history from your browser.

Communications, fundraising and marketing

Where you have provided us with your physical address, we will contact you by post; and where you have provided appropriate consent, also by telephone and e-mail, with targeted communications to let you know about our events and/or activities that we consider may be of particular interest; about the work of Staying Put; and to ask for donations or other support.

Donations and other payments

All financial transactions carried out on our website are handled via JustGiving <https://www.justgiving.com/about/info/privacy-policy/privacy-policy-v30#:~:text=JustGiving%20uses%20your%20personal%20data,and%20to%20advertise%20to%20you.>

Just Giving is a third-party payment services provider. They do not store your financial details.

Just Giving Fees:

JustGiving Fees include:

1.9%+20p per transaction which covers card provider charges, set by external card providers.

If the donation is made in another currency, then the processing fee is 2.90%+20p per transaction

Example based on a £10 donation:

$\text{£}10 \times 1.9\% = 19\text{p} + 20\text{P} = 39\text{p}$. So, for every £10.00 donation we receive £9.61

Where gift aid has been granted by the donor, we would receive £10 + 25% from HM Government = £12.50 less processing fees of 39p = £12.11

Children's data

We process data of any person under the age of 16 only with consent from the parent. If we come to discover, or have reason to believe, that you are 15 and under and we are holding your personal information, we will delete that information within a reasonable period and withhold our services accordingly.

Subject Access Requests (SAR)

You have the right to obtain a copy of your personal data held at Staying Put, as well as other supplementary information. You have the right to ask an organisation whether or not they are using or storing your personal information. Copies of your personal information must be requested in writing. This is called the right of access and is commonly known as making a subject access request or SAR.

You can make a subject access request to find out:

- what personal information an organisation holds about you;
- how they are using it;
- who they are sharing it with; and
- where they got your data from.

How to make a SAR

Please contact us at referrals@stayingput.org.uk to make a SAR request, using 'SAR Request' as the subject line. Usually, we will comply with your request without delay and at the latest within one month. Where requests are complex or numerous, we may contact you to inform you that an extension of time is required. The maximum extension period is two months.

What information will I receive?

When we respond to your request, we will tell you whether or not we process your personal information and give you copies of it. We will tell you:

- what we are using your information for;
- who we are sharing your information with;
- how long we will store your information, and how we made this decision;
- details on your rights to challenge the accuracy of your information, to have it deleted, or to object to its use;
- your right to complain to the ICO;
- details about where we got your information from;
- whether we use your information for profiling or automated decision-making and how we are doing this; and
- what security measures we take if we have transferred your information to a third country or an international organisation.

CIRCUMSTANCES IN WHICH YOUR REQUEST MAY BE REFUSED

We may refuse to deal with your subject access request if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay, and at the latest within one month of receipt, to inform you of this and to provide an explanation. You will be informed of your right to complain to the Information Commissioner and to a judicial remedy.

We may also refuse to deal with your request, or part of it, because of the types of information requested. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the reason will be provided.

Other disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we will disclose your information to regulatory and/or government bodies and/or law enforcement agencies upon request only when required to do so in order to satisfy legal obligations which are binding on us.

Security of and access to your personal data

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure of or access to your personal information.

Our secure case management systems include two factor authentication and MFA security for email systems.

Your information is only accessible by appropriately trained staff, volunteers and contractors in line with GDPR.

We may also use agencies and/or suppliers to process data on our behalf. We may also merge or partner with other organisations and in so doing transfer and/or acquire personal data.

Please note that some countries outside of the EEA have a lower standard of protection for personal data, including lower security requirements and fewer rights for individuals. We may transfer and/or store personal data collected from you to and/or at a destination outside the European Economic Area ("EEA"). Such personal data may be processed by agencies and/or suppliers operating outside the EEA. If we transfer and/or store your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your personal data.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with your informed consent.

Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

- (1) Right to be informed – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- (2) Right of access – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we have 30 days to comply.

(3) Right of erasure – you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it.

(4) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.

(5) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.

(6) Right to data portability – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details in section 16 below. Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we reserve the right to ask for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult ICO guidance <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-protection-principles/a-guide-to-the-data-protection-principles/> or please contact us using the details in section 16 below.

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner’s Office (“ICO”). For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/personal-information-what-is-it/what-is-personal-information-a-guide/>. The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

Lawful processing

We are required to have one or more lawful grounds to process your personal information. Only 4 of these are relevant to us:

- Personal information is processed on the basis of a **person’s consent**
- Personal information is processed on the basis of a **contractual relationship**
- Personal information is processed on the basis of **legal obligations**
- Personal information is processed on the basis of **legitimate interests**

(1) Consent

We will ask for your consent to use your information to send you electronic communications such as newsletters and marketing and fundraising emails, for targeted advertising and profiling, and if you ever share sensitive personal information with us.

(2) Contractual relationships

Most of our interactions with subscribers and website users are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us.

(3) Legal obligations

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

(4) Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use 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 consent.

Achieving our purposes

To work collaboratively to end domestic abuse and/ sexual violence.

Governance

- Internal and external audit for financial or regulatory compliance purposes
- Statutory reporting

Publicity and income generation

- Conventional direct marketing and other forms of marketing, publicity or advertisement
- Unsolicited commercial or non-commercial messages, including campaigns, newsletters, income generation or charitable fundraising
- Analysis, targeting and segmentation to develop and promote or strategy and improve communication efficiency
- Personalisation used to tailor and enhance your experience of our communications

Operational Management

- Employee, volunteer and trustee recording and monitoring for recruitment, safety, performance management or workforce planning purposes
- Provision and administration of staff payroll and benefits such as pensions
- Physical security, IT and network security
- Maintenance of suppression files
- Processing for historical, scientific or statistical purpose

Purely administrative purposes

- Responding to enquiries
- Delivery of requested products or information
- Communications designed to administer existing services including administration of petitions and financial transactions
- Thank you, communications and receipts,
- Maintaining a supporter database

Financial Management and control

- Processing financial transactions and maintaining financial controls
- Prevention of fraud, misuse of services, or money laundering
- Reporting criminal acts and compliance with law enforcement agencies

When we use your personal information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair in other ways.

Data retention

In general, data will be retained in line with our data retention policy.

In the event that you ask us to stop sending you direct marketing/fundraising/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

Policy amendments

We keep this Privacy Policy under regular review and reserve the right to update from time to time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Policy occasionally to ensure you understand it. We may also notify you of changes to our privacy policy by email.

Third party websites

We link our website directly to other sites. This Privacy Policy **does not** cover external websites and **we are not responsible** for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

Updating information

You can check the personal data we hold about you, and ask us to update it where necessary, by emailing us at referrals@stayingput.org.uk

Contact

Please let us know if you have any queries or concerns whatsoever about the way in which your data is being processed by either emailing at referrals@stayingput.org.uk or by writing to us at the following address:

Head of Operations and Client Care
Staying Put,
P.O Box 449
Bradford,
BD1 2XB

Amendment Log:

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
May 2018	New policy	Board and staff	To bring policy in line with GDPR
March 2020	Statement updated	Staff and board	Removed Keighley DVS Statement and added Staying Put logo, made minor numbering amendment
November 2021	Retention Period updated	Staff and Board	Updated Retention Information as per BMDC DPA
February 2023	Annual Review	SLT	No significant changes.
April 2023	Amendment	HR manager	Executive Summary added
November 2023	Amendment	SLT	Links corrected, SAR section amended to say that we may refuse a request
March 2024	New policy template	Head of Ops & CC	No significant changes

Date Agreed by Board	May 2018, March 2020, November 2021, November 2023
Date reviewed	March 2024
Next review	March 2027