



The Welcome Directory Data Protection Policy

1. INTRODUCTION

- 1.1 This policy sets out how the The Welcome Directory collects and uses your personal information. We encourage you to read this policy carefully.
- 1.2 The Data Protection Lead is responsible for the monitoring and implementation of this policy. If you have any questions about the content of this policy or other comments you should contact the Data Protection Lead. Contact details are provided at the end of this policy.
- 1.3 The Welcome Directory is committed to respecting your privacy and ensuring the personal information you have entrusted to us is held securely. We process personal information in accordance with the Data Protection Act 1998 and the General Data Protection Regulations 2018 (GDPR).

2. SCOPE

- 2.1 This policy applies to all voluntary and paid staff, and all other stakeholders who engage with The Welcome Directory regarding the data that is held by the organisation (as detailed in section 5).
- 2.2 All voluntary and paid staff must be familiar with this policy and comply with its terms.
- 2.3 The Welcome Directory will review this policy regularly. The terms of this policy may be updated at any time, for example, in the event of changes in law and how we operate. If there are any significant changes in the way we process your personal information, we will provide a prominent notice on our website or send a notification. This policy was last updated in June 2021 and will be reviewed again in June 2024.

3. GENERAL PRINCIPLES

- 3.1 The Welcome Directory will observe the following principles in respect of the processing of personal data:
 - (a) to process personal data fairly and lawfully in line with individuals' rights;
 - (b) to make sure that any personal data processed for a specific purpose are adequate, relevant and not excessive for that purpose;
 - (c) to keep personal data accurate and up to date;
 - (d) to keep personal data for no longer than is necessary;
 - (e) to keep personal data secure against loss or misuse;



- (f) not to transfer personal data outside the EEA (which includes the EU countries, Norway, Iceland and Liechtenstein) without adequate protection
- 3.2 A data controller determines the purposes and means of processing personal data. The Welcome Directory is responsible for determining the purposes and means for processing data, i.e. how and why the data is processed. A data processor is responsible for processing personal data on behalf of a controller.
- 3.3 When we hold or use your personal information as a data controller we will make this privacy policy available to you which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights.

4. HOW WE COLLECT PERSONAL INFORMATION

- 4.1 We collect personal information directly from you when you:
 - (a) Register your faith community;
 - (b) Sign up to our mailing list to receive regular mailings from us;
 - (c) Become a volunteer;
 - (d) Register your interest or participate in any of our events, including the Prisons Awareness Course and Welcome Directory Connections or host an event;
 - (e) Apply for a position, either paid or voluntary, with The Welcome Directory
 - (f) Make a donation, or become a regular giver;
 - (g) Visit our website (please see our Cookies section for more information);

5. THE PERSONAL INFORMATION WE COLLECT

- 5.1 We regularly collect the following personal information from you:
 - (a) Personal identifiers such as your title and name;
 - (b) Contact details including postal address, postcode, email and telephone numbers;
 - (c) Whether you are a UK tax payer (as part of Gift Aid Declarations);
 - (d) Faith and name of faith community you are part of;
 - (e) How you found out about The Welcome Directory;
 - (f) Records of your contact with us
- 5.2 As a member of voluntary or paid staff or prospective staff of The Welcome Directory, we also collect information that you provide us with in your CV and cover letter and/or through employment:
 - (a) Personal identifiers such as your title and name;



- (b) Contact details including postal address, postcode, email and telephone numbers;
- (c) Employment and education history, qualifications and references;
- (d) Bank, Passport and National Insurance and P45 (tax) details (paid staff only);
- (e) Details of criminal records (via DBS check) (voluntary and paid staff);
- (f) Records of performance, such as appraisals and records of any training (paid staff only)

5.3 The GDPR recognises some information as 'sensitive personal data'. This includes, but is not limited to, information which reveals your religious beliefs, health issues, race or ethnic origin, and any criminal convictions. The Welcome Directory works across faiths and belief systems, so where necessary, we may collect details about your faith community affiliations and personal faith. The Welcome Directory will always treat any sensitive personal data we process with greater care and process the information in accordance with the Data Protection Act.

6. WHAT DATA IS MADE PUBLICLY ACCESSIBLE?

6.1 As a registered faith community, we collect information that you provide us with in your application form.

6.2 The below information, unless stated otherwise, is included publicly, with your permission as per the application form declarations:

- (a) Faith/belief group and denomination;
- (b) What geographical area are you in;
- (c) Which prison are you linked with or details of other relevant experience;
- (d) Senior community leader's name, email and telephone numbers;
- (e) Name and address details of the faith community, including postcode and details of when you gather and what times, size, services/activities;
- (f) Website of your faith community and any social media links such as Facebook or Twitter;
- (g) Description of Faith Community

6.3 The password protected login area, available on our website, provides the following details to Prison Chaplains, Community Chaplains, HMPPS Chaplaincy HQ Staff, HMPPS Faith and Belief Advisors, Managers of Approved Premises, Offender Supervisors and Probation Officers. These are shared with your permission as per the application form declarations:

- (a) Faith/belief group and denomination;
- (b) What geographical area are you in;
- (c) Which prison are you linked with or details of other relevant experience;
- (d) Senior community leader's name, email and telephone numbers;



- (e) Name and address details of the faith community, including postcode and details of when you gather and what times, size, services/activities;
- (f) Website of your faith community and any social media links such as Facebook or Twitter;
- (g) Description of Faith Community;
- (h) Safeguarding name, email and telephone numbers

6.4 The below information is collected for internal use only and is therefore not available publicly:

- (a) Champion name(s), email and telephone numbers;
- (b) Applicant name, email and telephone numbers

7. WHY WE COLLECT YOUR PERSONAL INFORMATION

7.1 We regularly collect the above data:

- (a) To allow prison leavers to make an informed decision on which faith community to connect with upon release;
- (b) To allow Prison Chaplains, Community Chaplains, HMPPS Chaplaincy HQ Staff, HMPPS Faith and Belief Advisors, Managers of Approved Premises, Offender Supervisors and Probation Officers to provide a selection of options for prison leavers seeking faith community support upon release;
- (c) To keep you informed about our work;
- (d) To enable us to contact you;
- (e) To manage and coordinate our volunteers;
- (f) To create and manage effective partnerships with faith communities and other stakeholders;
- (g) For compliance with employment law, payroll purposes, and other statutory requirements;
- (h) To process regular giving payments and any other donations;
- (i) To reclaim tax on Gift Aid donations, if applicable
- (j) To determine and improve the effectiveness of our website, future communications, and provide you with the best service;

8. MARKETING PERMISSIONS

8.1 We love sharing news and stories about how your support is transforming lives through connecting prison leavers with faith communities. This includes sending you information about our work, news, appeals and events.



8.2 We may occasionally contact you to ask for any stories or updates that could be used to promote the role of faith and/or the work of The Welcome Directory. We will only share these with your permission with wider audiences (including but not limited to, in publications, our website and social media). Pseudonyms may be used when necessary or requested.

8.3 We will always ask for your permission to add you to our email mailing list and your details will never be shared with or sold to any third party for marketing purposes.

9. COOKIES

9.1 By using our website, you will be given the option to agree to the use of cookies. This is subject to any preferences or browser settings you may have.

9.2 Cookies are small text files that are placed on your computer by websites that you visit. The Welcome Directory uses cookies to enable our website to function effectively, to improve your experience and to determine and improve the effectiveness of our website and future communications. Here is a brief overview of the types of cookies we use on The Welcome Directory website, which consist of two categories:

(a) CMS cookies – our website is created in a CMS (Content Management System) called WordPress, which places a small number of standard WordPress cookies on your computer as you use it. Additional cookies will be placed on your computer if you are an editor on this CMS system (for example if you are a staff member or an IT contractor)

(b) Cookies to improve your experience – we use a small number of cookies on our website to help you get the best experience. Similarly, the first time you load The Welcome Directory homepage, you will see a notice at the top of the page about cookies. We place a cookie on your computer when you press 'X', so that you don't see this notice in future. We also embed YouTube films on our website regularly. We are unable to prevent this site, or external domains, from collecting information on your usage of this embedded content. If you are not logged in to these external services then they will not know who you are but are likely to gather anonymous usage information for example, number of views, plays, loads etc.

9.3 To learn more on how to manage your cookies visit <http://www.aboutcookies.org/how-to-delete-cookies/> or to learn more generally about cookies visit <http://www.aboutcookies.org/>

10. HOW LONG WE KEEP YOUR DATA

10.1 The Welcome Directory will only keep your personal information for as long as it is required and in accordance with statutory requirements. Where the information is no longer required, we will ensure that it is disposed of in a secure manner.

10.2 If you have indicated that you do not wish to hear from us in the future, we will keep the minimum information necessary to ensure we avoid contacting you any further.



- 10.3 A data log is kept summarising the data stored by The Welcome Directory, including where stored, how data is used and date of review. The data controller will review compliance with this on an annual basis.

11. SECURITY

- 11.1 The Welcome Directory employs a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access, use, or disclosure of it. Unfortunately, no information transmission over the internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

12. YOUR INFORMATION RIGHTS, CHOICES AND REQUIREMENTS

- 12.1 The GDPR gives you the right:
- (a) To request in writing and securely obtain copies of the personal information The Welcome Directory holds about you. The Welcome Directory must respond to a valid request within the legally prescribed time limits. All such requests should be referred immediately to the Data Protection Lead;
 - (b) To correct or update your personal information processed by The Welcome Directory;
 - (c) To request The Welcome Directory to stop using your personal information for marketing purposes or for any other purpose where there is no legal requirement for continued processing
- 12.2 Both voluntary and paid staff must ensure that personal data held by The Welcome Directory relating to them is accurate and updated as required. If personal details or circumstances change, staff should inform their line manager as well as the Data Protection Lead so The Welcome Directory's records can be updated.

13. REPORTING CONCERNS OR BREACHES

- 13.1 Please contact us if you have any questions, or would like to raise a concern about The Welcome Directory's handling of your personal information. You can contact our Data Protection Lead. Contact details are provided at the end of this policy.
- 13.2 You also have the right to lodge a complaint with the Information Commissioner's Office about how we manage your data.
- 13.3 The Welcome Directory takes compliance with this policy very seriously. Staff have an obligation to immediately report actual or potential data protection compliance failures to the Data Protection Lead as soon as they are identified. This allows The Welcome Directory to:
- (a) investigate the failure and take remedial steps if necessary; and



(b) make any applicable reports to Information Commissioner's Office and others

13.4 Failure to comply with any requirement may lead to disciplinary action for voluntary or paid staff, which may result in dismissal.

14. DATA PROTECTION LEAD

14.1 For operational queries relating to this policy, please contact:
admin@welcomedirectory.org.uk

14.2 For serious concerns or to report a data breach, please contact the Data Protection Lead directly.

14.3 The Data Protection Lead for The Welcome Directory is:

Bob Wilson, Trustee

bob.wilson@welcomedirectory.org.uk

27 Tavistock Square, London, WC1H 9HH.