



External Privacy Notice

1. Introduction

Wyre Forest and South Worcestershire Nightstop and Mediation Service is committed to protecting your personal data and respecting your privacy.

This privacy notice explains how and why we collect, use, store and share personal data about people outside our organisation, including people who use or enquire about our services, family members, hosts, supporters, donors, referrers, partner organisations, professional contacts and others we come into contact with through our work.

For the purposes of data protection law, we are usually the “controller” of the personal data we collect and use. This means we are responsible for deciding how and why your personal data is processed.

“Processing” means anything we do with personal data, including collecting, recording, storing, using, sharing, deleting or destroying it.

This notice should be read alongside any other privacy information we provide to you at the point we collect your data.

2. How to contact us

If you have any questions about this privacy notice, how we use your personal data, or your data protection rights, please contact our data protection contact:

Data protection contact: Gill Hodgson, Business and Finance Lead.

Email: info@wfnightstop.org

Telephone: 01562 743111

Postal address: 35-36 Worcester St, Kidderminster DY10 1EW

We have not appointed a formal Data Protection Officer. However, we have a named data protection contact who is responsible for receiving data protection queries, requests and complaints and making sure these are handled appropriately.



3. What personal data means

Personal data is any information that identifies, or could identify, a living person.

This may include:

- your name;
- address;
- email address;
- telephone number;
- date of birth;
- emergency contact details;
- information you provide when contacting us;
- referral information;
- support needs;
- case notes;
- risk assessments;
- information about your family or household;
- details of interactions with us;
- donation or fundraising information;
- photographs or images, where relevant;
- information created as part of our work with you.

Some personal data is more sensitive and is known as “special category data”. This includes information about:

- health, including physical or mental health;
- racial or ethnic origin;
- religious or philosophical beliefs;
- political opinions;
- trade union membership;
- genetic data;
- biometric data used for identification;
- sex life;
- sexual orientation.



We may also process information about criminal convictions, offences, allegations or safeguarding concerns where this is relevant to our work and where the law allows us to do so.

4. Whose personal data we collect

We may collect and use personal data about:

- people who use, enquire about or are referred to our services;
- young people and adults we support;
- family members, carers, household members or emergency contacts;
- hosts and members of host households;
- volunteers and prospective volunteers;
- donors and supporters;
- people who attend events or training;
- people who sign up to newsletters or updates;
- referrers and partner organisations;
- professionals involved in support, safeguarding, housing, health, social care or education;
- suppliers, contractors and other business contacts;
- complainants or people involved in concerns, incidents or investigations.

We only collect the information we need for the relevant purpose.

5. How we collect personal data

We may collect personal data:

- directly from you;
- from someone acting on your behalf;
- from referral agencies;
- from local authorities;
- from schools, colleges or other education providers;
- from health or social care professionals;
- from safeguarding agencies;
- from police or emergency services;



- from partner organisations;
- from donors, supporters or fundraising platforms;
- from public sources where appropriate;
- through our website, email, phone calls, forms, meetings or events.

Where we receive personal data from someone else, we will only use it where we have a lawful basis to do so.

6. Why we use personal data

We may use personal data to:

- respond to enquiries;
- assess referrals;
- provide support, mediation, accommodation-related services or other assistance;
- safeguard young people, adults at risk, hosts, volunteers, employees and others;
- manage risk;
- communicate with you;
- keep accurate records;
- work with partner organisations;
- manage host and volunteer arrangements;
- process donations and fundraising activity;
- send updates, newsletters or supporter communications where lawful;
- organise events, training or activities;
- respond to complaints, concerns or incidents;
- meet legal, regulatory, funding, insurance and safeguarding obligations;
- monitor and improve our services;
- report to funders or regulators where required;
- protect our legal rights and the rights of others.

7. Our lawful bases for using personal data

We will only use personal data where we have a lawful basis under data protection law.

Depending on the circumstances, we may rely on one or more of the following lawful bases:

**Consent**

We may use your personal data where you have given clear consent for a specific purpose. You can withdraw consent at any time.

Contract

We may use personal data where this is necessary for a contract with you, or to take steps before entering into a contract.

Legal obligation

We may use personal data where this is necessary to comply with a legal obligation. This may include charity law, safeguarding obligations, employment law, tax, accounting, health and safety, regulatory or reporting duties.

Vital interests

We may use or share personal data where this is necessary to protect someone's life. This may apply in an emergency.

Public task

We may use personal data where this is necessary to carry out a task in the public interest and where there is a basis in law.

Legitimate interests

We may use personal data where this is necessary for our legitimate interests, or the legitimate interests of a third party, unless your rights and freedoms override those interests.

Our legitimate interests may include:

- running and managing our charity;
- providing and improving our services;
- keeping appropriate records;
- managing relationships with supporters, donors, partners and professionals;
- protecting people, property and systems;
- responding to concerns or complaints;
- promoting our work;
- understanding the impact of our services.

Where we rely on legitimate interests, we will consider the impact on you and will not use your data where your rights and freedoms override our interests.



Recognised legitimate interests

In some limited circumstances, the law recognises certain legitimate interests, such as safeguarding, responding to emergencies, crime prevention or other specified purposes. We will only rely on recognised legitimate interests where the purpose clearly fits the legal requirements and the processing is necessary and proportionate.

8. Special category data and criminal offence data

We may process special category data or criminal offence data where this is necessary for our work and where the law allows us to do so.

This may include information about health, safeguarding, risk, support needs, protected characteristics, criminal offences, allegations or concerns.

Where we process this type of information, we will usually rely on one or more additional legal conditions, such as:

- explicit consent;
- vital interests;
- legal claims;
- substantial public interest;
- safeguarding children or adults at risk;
- preventing or detecting unlawful acts;
- providing confidential advice, support or services;
- equality of opportunity or treatment;
- employment, social security or social protection law, where relevant.

We will treat this information with particular care and restrict access to those who need it.

9. Sharing personal data

We will only share personal data where it is lawful, necessary and appropriate.

We may share personal data with:

- local authorities;



- safeguarding teams;
- police or emergency services;
- health or social care professionals;
- housing providers;
- education providers;
- referral agencies;
- partner organisations;
- funders, auditors or regulators;
- the Charity Commission;
- insurers or legal advisers;
- IT, database, email, website, payroll, finance or other service providers;
- professional advisers;
- other organisations where required or permitted by law.

Where we use suppliers who process personal data on our behalf, we will make sure appropriate data protection arrangements are in place.

Where there is a safeguarding concern, risk of harm, legal obligation or emergency, we may share personal data without consent where the law allows.

We will not sell your personal data.

10. Fundraising, marketing and supporter communications

We may use personal data to send fundraising, marketing or supporter communications where the law allows us to do so.

For electronic communications such as emails, texts or direct messages, we will rely on consent where required.

As a charity, we may also be able to use the charity soft opt-in for electronic communications where you have supported, or expressed an interest in, our charitable purposes and the legal requirements are met.

Where we use the charity soft opt-in, we will only contact you in connection with our charitable purposes and we will give you a clear opportunity to opt out.



You can unsubscribe or ask us to stop sending marketing or fundraising communications at any time.

We will respect opt-outs promptly.

11. How we store personal data

We hold personal data securely in paper and electronic formats.

We use appropriate security measures to protect personal data from unauthorised access, loss, misuse, alteration or disclosure.

These may include:

- access controls;
- password protection;
- multi-factor authentication where appropriate;
- secure storage;
- locked filing cabinets;
- secure email and IT systems;
- staff and volunteer training;
- confidentiality requirements;
- data breach reporting procedures.

Access to personal data is limited to those who need it for their role.

12. International transfers

Some of the systems or suppliers we use may involve personal data being stored or accessed outside the UK.

Where personal data is transferred outside the UK, we will make sure the transfer is lawful.

This may include checking whether the destination country has adequacy status under UK law, or putting appropriate safeguards in place such as the UK International Data Transfer Agreement or UK Addendum, where required.



13. How long we keep personal data

We will only keep personal data for as long as necessary for the purpose for which it was collected.

Retention periods depend on the type of data, the reason we hold it, legal requirements, safeguarding requirements, funder or regulator requirements, insurance needs and whether the information may be needed in relation to complaints, incidents or legal claims.

Our usual retention periods are set out in our Data Retention Schedule.

Once personal data is no longer needed, we will securely delete, destroy or anonymise it unless there is a lawful reason to keep it for longer.

14. Your data protection rights

You have rights in relation to your personal data.

These include the right to:

- be informed about how your personal data is used;
- request access to your personal data;
- ask us to correct inaccurate or incomplete personal data;
- ask us to delete personal data in certain circumstances;
- ask us to restrict the use of your personal data in certain circumstances;
- object to the use of your personal data in certain circumstances;
- receive some of your personal data in a commonly used electronic format in certain circumstances;
- withdraw consent where we rely on consent;
- not be subject to certain automated decisions that have legal or similarly significant effects.

These rights do not apply in every situation.

If you make a request, we will respond without undue delay and usually within one month. Where a request is complex, or where we receive multiple requests, we may be able to extend the response period by up to a further two months.



Where we reasonably need clarification to identify the information requested, the response period may be paused until clarification is received.

We may need to verify your identity before responding to a request.

15. Data protection complaints

If you are unhappy with how we have handled your personal data, you can complain to us.

You can contact our data protection contact using the details in section 2 of this notice.

- We will acknowledge data protection complaints within 30 days.
- We will consider and respond to complaints without undue delay.
- Where appropriate, we will explain the outcome of the complaint and any steps we have taken.

You also have the right to complain to the Information Commissioner's Office.

16. Complaints to the Information Commissioner's Office

The Information Commissioner's Office is the UK regulator for data protection.

You can complain to the ICO if you are unhappy with how we have handled your personal data.

You can find more information on the ICO website.

We would welcome the opportunity to respond to your concern first, but you are not required to complain to us before contacting the ICO.

17. Cookies and website technologies

Our website uses essential cookies that are necessary for the proper operation of the website.

We do not currently use non-essential cookies such as Google Analytics.



If this changes, we will update this notice and provide clear information about the cookies or similar technologies we use.

Where consent is required, we will ask for consent before setting non-essential cookies or similar technologies.

Where a limited exemption applies, we will still provide clear information and a way to object where required.

18. Changes to this notice

We may update this privacy notice from time to time.

The latest version will be made available on our website or provided on request.

Next review date June 2028.