

WLAC Privacy Policy

At West London Action for Children, we are committed to protecting and respecting your privacy.

This privacy notice aims to give you information on how we collect, process and handle the personal data provided to us by your use of our website and data you choose to give us when you volunteer, donate or register with us.

Your personal data – what is it?

“Personal data” is any information about a living individual which enables them to be identified (for example a name, photograph, video, email address, or address). Identification can be based on the information alone, or in conjunction with further information. The processing of personal data is governed by the Data Protection Act 2018, the UK General Data Protection Regulation (“UK GDPR”), and other legislation relating to personal data and rights such as the Human Rights Act 1998.

Who are we?

West London Action for Children (“we”, “us”, “our”) is a registered charity no. 1135648 and company limited by guarantee no. 7181950.

The registered address is 15 Gertrude Street, London SW10 0JN. As the data controller we are responsible to you for how we process your data.

How do we collect information from you?

We obtain information about you when you:

- use our website;
- when you register to receive our email newsletter;
- when you email us using the details provided on the ‘contact us’ page;
- when you donate or fundraise;
- when you volunteer; and
- when you sign up to receive any of our services such as our One to one counselling service; group therapy; children and young people services; or join our Stay and Play (Jigsaw)
- make a one-off donation or set up a standing order to donate regularly; and
- give us information when you volunteer, donate or register in person at West London Action for Children.

What type of information is collected from you?

We need to process some or all of the following information where necessary to perform our tasks:

- Names, titles, and photographs;
- Contact details such as telephone numbers, addresses, and email addresses, and your communications preferences;

- Bank account information; if you make a donation online via Virgin Money; Just Giving: or Paypal.
- Where we are required to provide a specific service to you, for example parenting support, or where you provide them to us, we may process demographic information such as gender, date of birth, education/work histories, academic/professional qualifications, benefits and household income;
- Where we are required to provide a specific service to you, or where you provide them to us, we may process special category data such as ethnicity, disability, learning disability or difficulty, mental and physical health, medication, criminal record.

How do we process your personal data?

As a data controller we will comply with our legal obligations to process data fairly and lawfully; to keep personal data accurate and up to date; to process data in accordance with your rights; to destroy it securely; to not collect or retain irrelevant or excessive amounts of data; to keep and store personal data securely; not to process personal data in any manner incompatible with specified and lawful purposes; and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- to enable us to meet all our legal and statutory obligations (which include maintaining donation and Gift Aid records in accordance with HMRC regulation);
- to carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- to provide you with the services that you choose to access;
- to process a donation that you have made (including Gift Aid information);
- to seek your views or comments on the services we provide;
- to notify you of changes to our services;
- to maintain our own accounts and records;
- to send you communications which you have requested and that may be of interest to you. These may include information about news, campaigns, events, and other fundraising activities;
- to process a grant and comply with contractual grant monitoring requirements;
- to process a volunteering application and to manage our volunteers;
- to process a job application;
- our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We will hold your personal information on our s

systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

What is the legal basis for processing your personal data?

We will only use your personal data when the law allows us to.

Most of our data is processed because it is necessary for our legitimate interests (and your interests and fundamental rights do not override those interests).

Our “legitimate interests” means the interests of our charity in conducting and managing our charity in pursuit of its charitable aims. An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Where we process sensitive personal data (special category) in our legitimate interest, we may need to apply the UK GDPR article 9 conditions. These conditions also require us to identify a law which can be relied upon. This could be for but may not be limited to the following purposes.

1. Where an individual is at risk
2. Where we process criminal records including undertaking DBS checks
3. Where data is processed in the public interest
4. Where we process data for the purposes of measuring diversity and inclusion

Where data is processed for the purposes shown here, we may rely upon an appropriate policy document.

Some of our processing is necessary for us to comply with the law. For example, maintaining financial and Gift Aid records in accordance with HMRC regulation.

Who has access to your information?

Your personal data will be treated as strictly confidential. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent.

It is likely that we will need to share your data with some or all of the following (but only where necessary):

- if you make a donation and submit a Gift Aid declaration form, we must share the declaration form, including your name, address and the donation amount, with HMRC to be able to reclaim tax on your donation;
- When you are using the secure Paypal online donation pages, your donation is processed by Paypal, who specialise in the secure online capture and processing of credit/debit card transactions. As a fundraiser or donor, your information will be passed to West London Action for Children to manage your fundraising or donation, as applicable. These platforms will not pass your information to us for marketing

purposes, unless you consent for them to do so. You can also choose to withdraw this consent at any time by logging into the unsubscribe pages of our website.

- if you are accessing our services, it is likely that we will have to share your data in an anonymised form with the relevant bodies or organisations funding the services we provide to you. We may have to share some of your information in a non-anonymised form with the Royal Borough of Kensington & Chelsea; or the London Borough of Hammersmith and Fulham.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 6 years is minimum years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for our community, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us.

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the UK will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the UK.

If you have requested that we send you email updates, most likely in the form of our email newsletter, we will use email marketing company Mailchimp, based in the United States of America. This means that your name and email address are transferred outside of the country. Where this is the case suitable safeguards will be in place to protect such personal data.

The majority of the data we collect is stored securely with our main data processor Microsoft Office 365, whose relevant server is located in the UK.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond

with proof of your identity before you can exercise these rights. If we cannot identify you, we may be exempt from our obligation to comply with such rights of personal data.

The right to be informed about the collection and use of your personal data by us

- We must provide you with information including our purposes for processing your personal data, our retention periods for that personal data and who it will be shared with.

The right to access information we hold on you

- At any point you can contact us to request access to the information we hold on you, as well as to ask why we have that information, who has access to the information and where we obtained the information from.
- Once we have received your request we will respond without delay – at most within one month, though if the request is complex or numerous, we can extend the period of compliance to two months (as long as we inform you within one month of receipt of the request and explain why the extension is necessary).
- There are no fees or charges, though if the request is repetitive, unfounded, or excessive we may charge a reasonable fee.

The right to correct and update the information we hold on you

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- You can make your request verbally or in writing; we will have one calendar month to respond to the request.

The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for the performance of a task carried out in the public interest or a legal obligation).
- You can make your request verbally or in writing; we will have one calendar month to respond to the request.

The right to restrict the processing of your data in certain circumstances

- You can request the restriction or suppression of your personal information. This means that we are permitted to store your information, but not to use it.
- This right applies, for example, if you contest the accuracy of your information and we are verifying the accuracy of the data; or if the data has been unlawfully processed and you oppose erasure and request restriction instead.

The right to data portability

- You have the right to request that we transfer your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

The right object to processing

- You have the right to request that we stop processing your data where we are relying on a legitimate interest and you have a ground to object based on your

particular situation. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have compelling legitimate grounds for the processing.

- You have the right to object where we are processing your data for direct marketing purposes.

The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought

The right to lodge a complaint with the Information Commissioner's Office (contact details are below).

Further processing

If we wish to use your personal data for a new purpose, not covered by this notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Use of 'cookies'

Our website uses cookies. Cookies are tiny text files that are placed on your device to help us make our website easy to use.

Cookies are mostly used to store your preferences and provide us with anonymised tracking data to help us understand how people use our website, so we can keep improving it. We share this anonymised data with third-party software like Google Analytics.

Mostly, cookies make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the [About Cookies website](http://www.aboutcookies.org) (www.aboutcookies.org) which offers guidance for all modern browsers.

(The above is subject to the new design of the website in which we are currently engaged.

16 or Under



We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on our website www.wlac.org.uk . This Notice was last updated in June 2023.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Protection Lead, West London Action for Children, 15 Gertrude Street, London Sw10 0JN.

Tel: 020 7352 1155

Email: team@wlac.org.uk

You can contact the **Information Commissioner's Office** on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF for more information about your legal rights in relation to the information we hold about you.

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