

Lancaster & District Homeless Action Service

Lancaster & District Homeless Action Service  
Protection from Abuse Policy

# Lancaster & District Homeless Action Service

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## Lancaster & District Homeless Action Service

- 1 Introduction
  - 1.1 Lancaster & District Homeless Action Service (LDHAS) recognises that it provides support services to vulnerable members of society within the community it serves.
  - 1.2 LDHAS acknowledges that it has, in conjunction with statutory agencies, a responsibility to protect its service users from abuse and significant harm. LDHAS works in the Lancaster local authority area and acknowledges that local authorities have developed their own procedures to protect those considered vulnerable. This procedure has therefore been developed in line with the guidance frameworks local authorities have been issued (DoH No Secrets 2000) to ensure a degree of consistency in the protection procedures adopted, in particular where abuse requires an escalation process and the involvement of the other agencies such as the local authority and the Police.
  - 1.3 LDHAS recognises that steps to protect service users from abuse do not solely include procedures for reporting and investigating suspicions of abuse. All staff working with clients requiring a mandatory check are checked using the Criminal Records bureaux before commencing employment with LDHAS and all staff are subject to the satisfactory completion of a probationary period enabling performance and conduct to be monitored.
  - 1.4 LDHAS provides support services to a variety of client groups but in broad terms a distinction can be made between those Projects working with children and vulnerable adults, and other Projects working with vulnerable adults. Although LDHAS currently has no projects working with children, future projects may encompass work in this field and as such is considered in this document. Work in the adult abuse and child abuse fields are different, as there is no one statutory framework for adult protection such as the 1989 Children's Act. This procedure recognises this distinction and seeks to clarify circumstances and situations of abuse within these two client groups to support staff in identifying forms of abuse although for corporate purposes the reporting and investigations processes remain the same.
  - 1.5 The author would like to acknowledge the assistance offered by the Manchester Methodist Housing Association in the writing of this policy.

## 2 Definitions

### 2.1 Abuse

2.1.1 Abuse is the violation of an individual's human and civil rights by any other person or persons.

2.1.2 Abuse occurs in many forms and may consist of a single act or repeated acts.

2.1.3 Abuse may also be shown in failure to act in order to prevent abuse from occurring.

2.1.5 Abuse may or may not result in a person being physically injured or ill.

### 2.2 Significant harm

2.2.1 Significant harm is taken to be ill treatment (including sexual abuse and forms of ill treatment that are not physical), the impairment of, or avoidable deterioration in physical or mental health, and the impairment of physical, emotional, social or behavioural development.

### 2.3 Children

2.3.1 Defined as those service users who are under 16 years of age

### 2.4 Vulnerable Adults

2.4.1 Those aged 16 and over who are, or who may be, in need of support services because of mental or other disability, age or illness and who are, or may be, unable to take care of themselves, or unable to protect themselves from harm or exploitation by others. Individuals who are recognised as most vulnerable include

- Young people under 18 years of age
- Those who are older and more frail
- Those with a physical disability
- Those with a physical illness including a terminal illness
- Those with mental health needs, or dementia

### 2.5 Consent

2.5.1 In determining whether or not abuse or significant harm has taken place consent is crucial to establish whether an act, relationship or situation is abusive of the person concerned. It is always necessary to

determine whether the person could and did give informed consent to whatever took place. The person may be unable to give informed consent because of their age, severity of their disability, situation or health issue. This can significantly undermine their understanding of the basic elements of another person's behaviour.

- 2.5.2 The professional relationship between staff and service users is one that must always focus on the needs of the client. All staff must recognise the imbalance of power in this relationship, generated by the need of the service users for support, guidance and assistance. This means that the relationship between staff and service users is not one of equality and the responsibility for the maintenance of professional boundaries rests with staff.
- 2.5.3 This policy and its associated procedures aim to clarify roles and responsibilities for workers, to define the parameters of abuse and to establish procedures in order to promote positive and timely interventions in circumstances of abuse.
- 2.5.4 All staff have a responsibility to ensure that allegations of abuse or suspected abuse are reported. Each case of abuse must be taken forward in accordance with non-discriminatory practice with staff recognising the individual's needs irrespective of race, culture, religion, language, age, disability, gender or sexual orientation.
- 2.5.5 Interagency working is vital in abuse investigations and the procedures identify circumstances in which LDHAS must work in cooperation with other agencies such as Inspection Units, the Police and Social Services to ensure appropriate protection. LDHAS has developed good relationships with these agencies and good practice indicates that protection is maximised when these relationship are maintained and developed.

### 3 Child Protection

3.1 The 1989 Children's Act has established a framework for ensuring that local authorities must act in instances where there is concern for the welfare of a person under the age of 16. This legislation recognises that child abuse can take a variety of forms and identifies four areas of abuse; emotional, physical, sexual abuse, and neglect. Whilst LDHAS has no statutory responsibility for child protection, staff must inform Social Services where there is reason to believe that a child may be at risk. The legislation requires Social Services to accept abuse referrals 24 hours a day and Emergency Duty Teams have been established for this purpose.

3.2 The following represents a guide to typical examples, which could constitute abuse within the four forms of abuse identified by the Children's Act. The list is not exhaustive but merely a guide to common forms. Any concerns or doubts on whether or not behaviour represents abuse to a child should always be checked with the appropriate agencies outlined in this policy.

#### 3.3 Physical Abuse

3.3.1 Staff have a duty to notify where there is reason to believe that there has been a physical injury to a child, including deliberate poisoning, where there is a definite knowledge or reasonable suspicion that the injury was inflicted, or knowingly not prevented. This includes injuries that are not satisfactorily explained, or where the explanation is not conducive to the injuries

3.3.2 Physical abuse includes:

- Hitting, slapping, pushing, kicking, squeezing, shaking, pinching,
- misuse of medication
- undue restraint
- force feeding

3.3.3 Indicators of physical abuse:

- Bruises
- grasp marks
- bruising to soft tissue areas e.g. cheeks, mouth, neck ears, stomach, chest, lower back, buttocks, genital area and thighs
- bite marks
- burns e.g. cigarette burns
- frequent visits to GP or Accident and Emergency Department
- Changes of GP

- Poisoning

### 3.4 Sexual Abuse

3.4.1 Staff must take action if they have witnessed occasions where a child has indicated sexual activity through words, play, drawing or had an excessive preoccupation with sexual matters, or had an inappropriate knowledge of adult sexual behaviour. Concern may also be raised by comments made by the child itself, or by other members of their household about behaviour that the child may have been exposed to.

3.4.2 Sexual abuse includes:

- sexual assault, rape or other sexual acts
- the inappropriate touching of the child's sexual organs
- coercion into the viewing of pornographic materials or sexual activity
- non-contact activity such as voyeurism or exhibitionism.

3.4.3 Indicators of sexual abuse:

- Bruising of the genital area, patchy bruising of inner thighs, buttocks, may be matching bruising caused by forced restraint
- Genital or urinary irritation
- Bleeding and evidence of bleeding on clothing
- Sexually transmitted diseases
- Pregnancy
- Appearing to be unable to sit comfortably
- Sexually uninhibited behaviour
- Reluctance to be toileted, or any routine involving the genital area revealed
- Bites
- Self harm
- Change to child's personality – withdrawn, tearful, displaying fear

### 3.5 Emotional Abuse

3.5.1 This form of abuse may take many forms and is more likely to relate to an ongoing record of concerns identified which staff believe to have a severe, adverse effect on the behaviour and emotional development of a child caused by persistent or severe ill treatment or rejection

3.5.2 Emotional abuse includes

- assaults on the child's emotions
- threats of harm

- abandonment
- withdrawal of social contact
- humiliation,
- shouting
- bullying
- name calling
- intimidation
- harassment
- the denial or withdrawal of required services, contacts and social or family networks

3.5.3 Indicators of emotional abuse:

- Insomnia or excessive sleep
- Weight loss or change in appetite
- Mood swings
- Withdrawal and apathy
- Agitation

3.6 Neglect

3.6.1 Like emotional abuse, this form of abuse can be identified in various ways and is likely to be the result of a series of concerns staff have identified over a period of time. Action should be taken where there has been persistent and severe neglect of a child, which results in serious impairment of a child's health or development, including failure to thrive.

3.6.2 Examples of neglect include:

- failure to access appropriate services for recognised needs
- avoidance of required health care
- ignoring physical care needs
- withholding of adequate nutrition, clothing or warmth
- exposing the child to unacceptable risk
- omitting to provide or ensure adequate supervision

3.6.3 Indicators of neglect include:

- Being left in wet or soiled nappies or clothing
- Inappropriate clothing
- Malnutrition
- Dehydration
- Untreated medical problems or non compliance with medication/ immunisations
- Isolation e.g. being left in bedroom
- Depression or withdrawal
- Lack of attention to personal hygiene needs



## Lancaster & District Homeless Action Service

- Lack of age appropriate toys and stimulation

## 4 Vulnerable Adults

- 4.1 There is no statutory framework governing the protection of vulnerable adults in the way the 1989 Children's Act protects children so there is no agreed and comprehensive definition of the abuse of vulnerable adults.
- 4.2 The Department of Health "No Longer Afraid" guidance issued in 1993 defines vulnerable adult abuse as follows; "Physical, sexual, psychological, financial or the result of neglect. Abuse may be intentional or unintentional and causes harm to the vulnerable adult either temporarily or over a period of time, and may occur within any setting."
- 4.3 The following represent a guide to typical examples which could constitute abuse within the five forms of abuse identified above. The list is not exhaustive but merely a guide to common forms. Any concerns or doubts on whether or not behaviour represents abuse should always be checked with the appropriate agencies outline in this policy.

### 4.4 Physical Abuse

4.4.1 This includes falls or injuries that are not satisfactorily explained, or, where the explanation offered is not conducive to the present injuries. It also includes rough handling or the use of excessive restraint.

#### 4.4.2 Indicators of physical abuse:

- Bruises, grasp marks
- Bruising to soft tissue areas e.g. cheeks, mouth, neck, ears, stomach, chest, lower back, buttocks, genital area and thighs
- Fractures
- Bite marks
- Burns e.g. cigarette burns
- Frequent visits to GP or Accident and Emergency Department
- Changes of GP
- Poor communication
- Poisoning

### 4.5 Sexual Abuse

4.5.1 The involvement of adults in sexual activities without their informed consent or where the individual has insufficient mental capacity to have full understanding of the activity. This relates to all forms of sexual activity including non-contact activity such as pornography, voyeurism

or exhibitionism. All sexual activity between staff and clients will be deemed as potentially abusive and must be reported to a Manager immediately.

#### 4.5.2 Indicators of sexual abuse:

- Bruising of the genital area, patch bruising of inner thighs, buttocks, includes matching bruising caused by forced restraint
- Genital or urinary irritation
- Bleeding, including evidence of bleeding on clothing
- Sexually transmitted diseases
- Pregnancy
- Appearing to be unable to sit comfortably
- Sexually disinhibited behaviour
- Obsessive behaviour e.g. washing, dressing
- Reluctance to be toileted or any routine involving the genital area being revealed
- Bites
- Self harm

#### 4.6 Emotional Abuse

4.6.1 The provocation of fear through threats of force, intimidation, humiliation or emotional blackmail. This includes threats of harm, bullying, name-calling and harassment. It can include the social isolation of an individual, or denying them choice e.g. through preventing them from accessing or receiving services. Emotional abuse is most likely to be evident in an ongoing record of incidents or concerns

#### 4.6.2 Indicators of emotional abuse:

- Insomnia or excessive sleep
- Weight loss or change in appetite
- Mood swings
- Withdrawal or apathy
- Agitation
- Confusion
- Paranoia
- Deterioration in physical capabilities
- Subservience
- Difficulty of workers, other agencies to gain access

#### 4.7 Financial Abuse

4.7.1 The denial of access of the individual to money, property and possessions, through acts of omission or commission, or the extortion of such through threats

4.7.2 Indicators of financial abuse include:

- Unexplained withdrawals of monies
- Inability to meet commitments or make purchases
- Disparity between the apparent lifestyle and assets
- Refusal to pay for services when it does not appear that finance is the issue
- Family or other interests in the individual's finances
- Embezzlement
- Fraud

4.7.3 *Staff Proviso:* Personal gain is strictly prohibited. Financial advice can be given where deemed appropriate. It is not acceptable in any circumstances for staff to appoint themselves as Power of Attorney. However, in extreme cases the decision could be taken to the Management Committee. Service Users belongings or money can never be kept by staff, however, money may be saved in the office safe if clients have no access to a bank account. Staff can never use the service user to their advantage and endeavours to ensure advice and support to the service user is strictly on a professional level.

#### 4.8 Neglect

4.8.1 The withholding of adequate care for daily living to the individual, whether intentional or unintentional. This includes nutrition, clothing, warmth, treatments or administering an inappropriate level of treatment. This could also involve non-intervention to prevent harm to an individual who is not considered to have sufficient capacity to appreciate risk.

4.8.2 Indicators of neglect include:

- Being left in wet, soiled or inappropriate clothing
- Malnutrition
- Dehydration
- Pressure sores, ulcers
- Untreated medical problems, non compliance with medication, or over sedation
- Movement restricted due to aids being moved out of reach
- Reduction in physical capabilities
- Isolation e.g. being left in a bedroom
- Depression
- Lack of attention to personal hygiene needs

**This policy implies compliance with child & vulnerable adult safeguarding and other project policies. This policy is also deemed to be compliant with all anti-discrimination legislation, regulations and policies.**

Document History

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13/02/08	Reviewed no changed made	CAW
30/09/09	modified	SMW
11/3/13	Approved	Trustees
23/8/13	Reviewed and revised	SMW

# LDHAS

## Code of Conduct



## **Code of Conduct for LDHAS Staff**

*This code provides guidance and boundaries to all LDHAS staff in their working relationships in projects, offices and in the community. It informs service users of what they can expect from LDHAS staff.*

### **As a LDHAS staff member, you are expected to:**

- Work in accordance with LDHAS's values and in a way that enhances the independence and dignity of service users and the reputation of LDHAS.
- Work with others in a polite and pleasant manner and behave in a way, which promotes good working relationships.
- Be sensitive to how others may see you; avoid language, behaviour or physical contact, which could be seen as rude, bullying or over-familiar.
- Treat everyone you come into contact with at work with respect in a way which is not discriminatory or offensive and be prepared to challenge and be challenged if any discriminatory or offensive behaviour or language is used.
- Act in LDHAS's interest towards achieving LDHAS's aims and objectives.
- Take responsibility for your own work, actions and learning, ask your supervisor or manager for help if experiencing difficulties, and contribute to finding solutions.
- Maintain appropriate confidentiality about service users, staff and LDHAS ( in line with the requirements of GDPR) . Whilst LDHAS encourages the sharing of information and wishes to operate in as open atmosphere as possible, a balance must be struck between unnecessary secrecy and betraying the privacy of individuals. Consult your manager if unsure.
- Be reliable in time keeping, doing work as agreed and keeping appointments.
- Deal with money and all financial matters in a way which is open, honest and accountable and which follows LDHAS procedures.
- Do not smoke outside of the building, in clients homes and respect the law regarding smoking.
- Be alert and responsible. No drinking alcohol at work or prior to coming to work. The use of illegal drugs is never acceptable.
- Talk to your supervisor, manager or Trustees if you have concerns about the behaviour of another member of staff or other professional.
- Be familiar with and follow all LDHAS policies and codes of practice.

- Exercise discretion in disclosing personal information and beliefs to service users, for example health problems and religious beliefs.

**It is not acceptable for you to:**

- Give or receive gifts, loans or payments to/ from service users, their relatives or friends,). Where it might be considered appropriate for an individual staff member to accept a gift in order to share it with the team and/ or project your Manager should be aware of this and document it.
- Take your relatives, friends or pets to projects other than when invited for special occasions.
- Provide additional contact or support to service users in your own time, other than during authorised times with service users. (See non-professional contact with clients policy).
- Use a LDHAS ID for purposes not related to work or if not current and valid.
- Have, encourage or allow personal or sexual relations between yourself and current users of your service. It is important to distinguish between friendliness and personal relationships with service users, which can be potentially abusive. If unsure, talk to your supervisor. (See non-professional contact with clients' policy).

*Staff members should note that breaches of the code might lead to disciplinary action.*

**The Health & Care Professions Council (HCPC)**

Since 2012, the General Social Care Council has been renamed as above. The HCPC has the role of raising standards in social care in the UK by developing and monitoring strategy and policy. The Council issued Codes of Practice for Social Care Workers and their Employers, which describe the standards of conduct, and practice to which we should work. These standards were revised in 2012 and can be found at [www.hpc-uk.org](http://www.hpc-uk.org). LDHAS's own code of conduct complements the HCPC standards. All LDHAS staff should read and understand these codes as they affect everyone who works in social care.

Reviewed and Approved at Board meeting 8<sup>th</sup> July 2019.



# **LDHAS**

## **Confidentiality Policy**



## **Confidentiality Policy**

Lancaster & District Homeless Action Service Limited is committed to practices and procedures that ensure confidentiality in respect of information relating to users of the service, staff members and volunteers. Within the organisation, the individual is to be seen as a person in his or her own right and not as an object of concern.

This confidentiality policy applies equally to staff and volunteers who have completed induction and all staff should have a clear understanding of LDHAS policy on confidentiality. Students on placement should have the same rights and responsibility as staff during the placement period.

### **Internal Confidentiality and record keeping**

There should be no issue of breaking confidentiality within the boundaries of the team; workers should be able to discuss any issue with colleagues in the team. Individuals should be made aware of this and no promises made that we will never share information and issues in the team. It can be made clear at the time that the staff may need to do this, not only for staff support, but to provide a better service to individuals using the service. Care must be taken to ensure that issues are not discussed within the hearing of others or visitors who are not members of the team.

### **Information to Third Parties**

As a general rule, except in exceptional circumstances (see below), no information about a particular individual we are working with should be given to any third party or agency without the consent of the individual concerned. Where possible, the individual concerned should be in the presence of the worker when consented information sharing is taking place or if that is not possible, the individual should be informed of the contact and the substance of the conversation as soon as possible.

No information will be requested of third parties regarding individuals by staff without the prior consent of the person concerned.

### **Exceptional Circumstances.**

There may be occasions when exceptional circumstances prevail; for example when the person or a third party are at risk or in immediate danger. There is no prescriptive list to cover all occasions but broad guidelines should be:

- Where the person concerned is clearly not in control of their own safety e.g. involved in an accident, suffering from a drug overdose.
- Where the emotional or mental state of the person concerned is such that it puts their own or third parties lives or safety at risk.
- Where a third party is at risk of danger or abuse e.g. where a sibling is left within the family and being abused.
- Where an act of an illegal nature is committed on LDHAS premises, which could place the future provision of the service in jeopardy.

The course of action should be that voluntary workers should discuss the situation with a staff member. Where necessary and appropriate, staff should discuss the situation with the Manager. The Manager is acting on behalf of the Board and may seek the assistance of other committee members.

### **Young People Who Have Run Away\***

It is not the policy of the LDHAS Limited to inform anyone of the whereabouts of a young person who has run away from home except in the following circumstances:

- Where a police officer is seeking the whereabouts of a young person and is in possession of a Recovery Order.
- Where a member of staff is ordered to do so by a court of law.

LDHAS staff will make positive efforts to negotiate on behalf of young people where the young person is in agreement with this course of action.

## **Records**

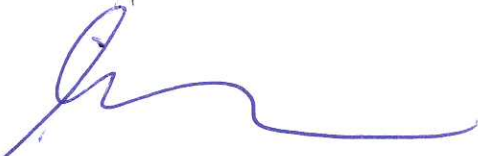
Only information which is required for a specified purpose and that is adequate, relevant and not excessive for that purpose will be kept. LDHAS has a records/database system, which means that individual records are accessible to them and to relevant staff. For security reasons all records will be kept under lock and key.

## **CCTV**

This method of record keeping lasts for one month only, as all tapes are numbered to align with days of the month. This one month limit can however be extended if the management believe there to be evidence captured relating to a specific crime and there is an intention to pursue legal proceedings. In general the CCTV system will not be accessible to outside group with the exception of the Police who may be given access in response to suspicion of a specific criminal act being committed on the premises.

This policy implies compliance with GDPR requirements, child & vulnerable adult safeguarding and other LDHAS policies. This policy is also deemed to be compliant with all anti-discrimination legislation, regulations and policies.

**\* No one under the age of 18 is allowed in the centre.**

REVIEWED / APPROVED Monday 13th MAY 2019  


# Our Privacy Policy

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## 1. About this Policy

LDHAS helps many people every year struggling with housing poverty or homelessness through our advice and support services. When carrying out our work we process personal data about people who receive advice, guidance or housing support services from us – or provide us with support through donations or volunteering. We are committed to protecting your privacy and take this responsibility very seriously. We therefore take care to safeguard it. This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

References to 'we' or 'us' are to LDHAS, Lancaster and District Homeless Action Service Limited, registered charity no: 1093016 (England & Wales) of Edward Street, Lancaster, Lancashire, LA1 1QH.

We regularly check this notice to ensure we provide you with the most up-to-date information regarding our data processing activities. We strongly advise you to read this page from time to time to ensure you are happy with any changes that might be made.

This privacy policy was prepared to be as comprehensive as possible, but it does not include an exhaustive list of every aspect our collection and use of personal information. However, we would be happy to provide any further information or explanation about our practices.

If you have any questions about this policy, please contact us using the details in the 'Contact us, section below.

This privacy policy was last updated in May 2018.

## 2. Why we collect your data

We collect personal data for many reasons, including to provide you with services, communicate with you and send you information you have requested, and administer campaigns and donations. Depending on how you interact with us, we may process data for the following reasons:

1. to provide you with advice and support services that you have requested or been referred to
2. to record personal details shared during conversations with us
3. to process personal details required for the administration of your donation
4. to record and contact you regarding payments you make to LDHAS
5. to administer services LDHAS is providing to you
6. to communicate with you regarding LDHAS's work, fundraising, and campaigning activities

7. to process donations and administer Gift Aid information for any donation you make to LDHAS
8. to provide you with information about and to administer events, including mass participation events, concerts, and festivals
9. for our own internal administrative purposes, and to keep a record of your relationship with us
10. to manage your communication preferences
11. to process job applications or volunteer placements
12. to conduct surveys, research and gather feedback
13. to obtain information to improve LDHAS's services and user experiences
14. to carry out research to find out more information about our supporters' and prospective supporters' backgrounds and interests
15. to comply with applicable laws and regulations, and requests from statutory agencies

### 3. Information we collect

We collect the following personal information:

1. your full name
2. contact details – including your postal address, telephone number(s), and email address
3. date of birth
4. details of your case when providing you with housing or benefits advice or services
5. your bank details
6. records of your correspondence and engagement with us
7. donation history and Gift Aid details
8. information you may enter on the LDHAS website
9. photographs, video or audio recordings
10. occupation
11. biographical information
12. other information you share with us

This information may be collected via:

13. any paper forms you complete
14. telephone conversations or face-to-face interactions
15. digital forms completed via our website, or online surveys
16. third-party companies and websites such as Just Giving
17. publicly available sources
18. communication via social media

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. For example, we may make a record that a person is in a vulnerable circumstance to comply with requirements under charity law and the Code of Fundraising Practice, to ensure that we do not send fundraising communications to them.

#### 4. **Using your personal data** **LDHAS Services**

If you are receiving advice, guidance or support from us, we will need to process your data because of your specific relationship with us.

We will keep all your case information – including notes, letters and information given to us about you – in a confidential record that is specific to you. We use a bespoke customised database system (Intrashare) to support our advice, guidance and support. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your case(s). This ensures that we provide appropriate and accurate advice or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or one of the other purpose discussed in this notice.

To ensure that our services meet a high standard of quality, client files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors if the work we do is funded by another organisation or charitable funder. All auditors are bound by confidentiality policies.

We may use your data for statistical reports. These statistics will not include any information that could be used to identify any individual.

#### **Fundraising/campaigning/direct marketing**

We would love to keep you up to date with our fundraising, marketing and campaign activity.

We use a range of marketing activities and channels to contact our supporters – including our website, face-to-face fundraising, direct mail, email, and telephone.

We will obtain your consent to contact you by email for marketing purposes. We will also obtain consent from all new supporters (who sign up after 25 May 2018) to make marketing calls.

We will send you marketing by post, on the basis of it being within our legitimate interests to do so, unless you opt out. See section 10 ('Our legal basis for processing data') for more information about our use of legitimate interests. We will also contact existing supporters by phone on this basis (unless they are registered with the Telephone Preference Service or have opted out of receiving marketing communications from LDHAS).

We send the following marketing materials:

1. **updates about LDHAS's work** – including newsletters and other publications informing you about our work
2. **campaigns** – information about our campaigning activities and updates about the progress of our campaigns (if any)
3. **appeals and fundraising activities** – including requests for donations, how you can raise money on our behalf, attend or take part in a fundraising event,

communications relating to our raffles, and updates on the impact that your fundraising activities have had on our work

4. **events** – including details of our challenges, such as sponsored runs and activities, as well as other events such as concerts and drama activities in aid of LDHAS. Please note that if you sign up to a LDHAS event, we will also send you administrative communications about how you can take part. On occasion we will also send you a reminder about the same event in future years, in case you want to participate in it again
5. **volunteering** – information about how you can help support LDHAS by giving up your time or using your influence to progress our aims, along with updates on the impact of your work
6. **professional services** – including details of the professional services that LDHAS offers, such as training and publications

We will **never** share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the ‘Contact us’ section below.

Any electronic communications, such as emails, will not have a link to unsubscribe from future electronic communications, so you will need to communicate you wish not to receive further communications by contacting the Manager on 01524 842008.

If you make any changes to your consent, we will update your record as soon as we possibly can. It may take up to 7 days for our systems to update and stop any postal communications from being sent to you. Email communications will, however, be stopped within the 7 days stated.

### **Administrative communications to supporters**

In addition to the fundraising and marketing communications that you receive from LDHAS, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters. For example, we will call you after you have set up a Direct Debit to confirm your details, and upon cancellation. There may also be other occasions where we need to contact you about your donation – for example, if there is a problem with a payment or in relation to your gift aid declaration.

On occasion, we will also contact you about an event that you have signed up to participate in, to – for example – check that fundraising pages have been set up and to provide any other necessary information.

As mentioned above, we may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

### **5. Applying for a LDHAS job**

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process



through the statistics collected. Where we need to share your data – such as for gathering references, obtaining a Disclosure and Barring Services (depends on the role), or a prison clearance (depends on the role) – you will be informed beforehand, unless the disclosure is required by law. These checks are only done after a position has been offered only to the successful candidate. On the application form, you are asked to complete the referee details, and can tick permission to contact referee. If you tick yes, once offered a role, we will automatically send out reference requests. If you tick no, we will contact successful candidates for permission first.

Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it. If we feel there is another suitable vacancy available, we will contact the applicant prior to sharing your application details with the relevant manager.

Once you have taken up employment with LDHAS, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

## **6. Professional contacts**

We may collect data about professional contacts and partners with whom we work. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

We may send our professional partners information and updates about our work (primarily by email). Such contacts can opt out of receiving this information at any time.

## **7. Our legal basis for processing personal data**

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that we carry out. This includes information that is processed on the basis of:

1. a person's consent (for example, to send you direct marketing by email )
2. a contractual relationship (for example, to provide you with goods or services that you have purchased from us)
3. processing that is necessary for compliance with a legal obligation (for example to process a Gift Aid declaration, and carrying out due diligence on large donations)
4. Shelter's legitimate interests (please see below for more information)

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always 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. Our legitimate interests include:

- Charity Governance: including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes
- Administration and operational management: including responding to solicited enquires, providing information and LDHAS services, research, events management, the administration of volunteers and employment, and recruitment requirements
- Fundraising and Campaigning: including administering campaigns and donations, and sending direct marketing by post (and in some cases making marketing calls), sending thank you letters

If you would like more information on our uses of legitimate interests, or to change our use of your personal data in this manner, please get in touch with us using the details in the ‘Contact us’ section below.

### **Disclosure of your personal data**

We will not share any of your personal data to any third party – except where:

0. the transfer is to a secure data processor, which carries out data processing operations on our behalf (please see section 13 for more information)
1. we are required to do so by law, for example to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation
2. it is necessary to protect the vital interests of an individual
3. we have obtained your consent

We will **never** share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

### **Security of your personal data**

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We encourage you to review the privacy statements of websites you choose to link to from the LDHAS website, so that you can understand how those sites collect, use and share your information. We are not responsible for the privacy statements, security, or other content on sites outside of the website.

## **Use of data processors**

We may use a third-party supplier to manage mailings for fundraising appeals, campaigns, conduct research surveys or storage of your personal information on our behalf. You can find out more about the suppliers that we use by getting in touch with us using the details in the 'Contact us' section below.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from us, and in accordance with a data processing agreement entered into between Shelter and the supplier.

## **Retention of your data**

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc., or any contractual obligation we might have – such as with government contracts or if we have a business case, such as with research data. For business case data, we will anonymise the data so no individual is identifiable.

Subject to the above, we will typically store data relating to donors and people who have taken campaign actions for seven years after their last donation or interaction, and people to whom we provide services to for seven years after completion of those services. Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

## **Your rights**

You have many rights under data protection legislation. These include:

### **0. Right of Access**

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as

the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by:

1. emailing the Manager at [admin@ldhas.org.uk](mailto:admin@ldhas.org.uk)
2. writing to the The Manager at LDHAS, Edward Street, Lancaster, Lancashire, LA1 1QH

#### 1. Right to be informed

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

#### 2. Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

#### 3. Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

#### 4. Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

#### 5. Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

#### 6. Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

#### 7. Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

### **Complaints**

If you have any complaints about the way in which we have used your data, please get in touch with us using the details in the 'Contact us' section below. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the [Information Commissioner's Office](#)

### **Contact Us**

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in section 12 above, you can get in touch with us in the following ways:

0. [admin@ldhas.org.uk](mailto:admin@ldhas.org.uk)
1. 01524 842008 (local rate number)
2. LDHAS, Edward Street, Lancaster, Lancashire, LA1 1QH

# **LDHAS**

## **Social Media Policy**



## **Introduction**

Employees of LDHAS may be able to access social media services and social networking websites at work, either through company IT systems or via their own personal equipment.

This policy describes the rules governing use of social media at LDHAS.

It sets out how staff must behave when using the company's social media networks. It also explains the rules about using personal social media accounts.

## **Policy scope**

This policy applies to all staff and volunteers at LDHAS who use social media while at work, or at home.

When using the term 'Social Media' this includes sites and applications such as Facebook, Instagram, Twitter, Snapchat and any other platform upon which you can share information with the wider public and 'friends'.

This policy stipulates that any information shared on social media about LDHAS must be appropriate and in-keeping with the values and aims of the organisation.

## **Basic guidelines**

Nothing can be posted that displays the organisation in a negative light, or that compromises the integrity of its running.

Nothing can be posted that makes a volunteer or employee of LDHAS look unprofessional, including the person who has made the post.

Anything posted on social media relating to LDHAS must adhere to confidentiality, equality and data protection policy guidelines.

Whilst in the building, volunteers / staff members must not access social media except during a lunch break, or for work-Related purposes by prior agreement.

Examples of ways that social media could be used in a positive light:

To raise the awareness of homelessness; to raise awareness of the centre and the services on offer; to advertise the drama performances of Alternative Outcomes at the Duke Theatre;

To enhance community fundraising.

Examples of ways that social media could be used in a negative light, which is not permitted:

Discussing other staff members / volunteers / issues that have been discussed in the workplace

Giving out details about any of the clients that use the centre.

Referring to the organisation in a private/personal post will be deemed is unprofessional.

It is also important that volunteers / staff members avoid communication with clients that attend the centre over social media, as this could contravene the professional boundaries that you are expected to uphold in your role here.

LDHAS social media sites are only to be used by staff members who have been authorised by the Centre Manager or the board of Trustees.

### **Monitoring social media use**

LDHAS IT and internet resources – including computers, smart phones and internet connections – are provided for legitimate business use.

Therefore LDHAS reserves the right to monitor how social media networks are used and accessed through these resources.

Additionally, all data relating to social media networks written, sent or received through the company's computer system is part of official LDHAS records.



## Potential sanctions

If a volunteer / employee (whether on a casual or a long term basis) contravenes these rules they will be made aware of the breach, the nature of why it breaks policy, and that it will be the responsibility of the Centre Manager or the Board of Trustees to decide what action is to be taken. This could be anything from a formal written warning to dismissal depending on the severity of the breach and the consequences that it may have on the Organisation and/or individual staff members or volunteers

15/06/2016	Policy introduced pending Trustee approval	Molly-Anne Eccles
11/02/2019	Trustee approval 