

Privacy Notice



**COMMUNITY
TRADING LIMITED**



JEWISH CARE

**DATA
PROTECTION
& GDPR**

*Caring for and protecting people's
information at Jewish Care*

This Privacy Notice explains when and why we collect personal information (personal data) about you, how we use it and the conditions under which we may disclose it to others. Your personal data is defined as any information that can directly or indirectly identify you. This notice also explains how we keep your data safe and secure and includes information you need to know about your rights and how to exercise them.

1. Who are we: Jewish Care and Jami

Jewish Care comprises both a charity and a trading company. Our charity is Jewish Care (company number 02447900 and registered charity no. 1003345 in England), a health and social care charity for the Jewish community. Our trading company is Community Trading Ltd (company number 02449362). Both our charity and our trading company are registered as data controllers with the ICO registration number: Z7007114, with our registered address at Amélie House, Maurice and Vivienne Wohl Campus, 221 Golders Green Road, London NW11 9DQ.

Jami (The Jewish Association for Mental Illness) (which is registered under company number 02618170 and registered charity no. 802559 in England) is aimed at enriching and saving lives impacted by mental illness in the Jewish community. Jami is registered as a data controller under ICO registration number ZA317613, with a registered address at Amélie House, Maurice and Vivienne Wohl Campus, 221 Golders Green Road, London NW11 9DQ. Our trading company is Jami Sales and Services Ltd, registered separately with the ICO under ICO registration number ZB531280.

Community Trading Limited (CTL) (which is registered under company number 02449362 in England) is the trading arm of Jewish Care and as such runs HeadRoom Café and employs its staff.

2. Contact us

If you have any questions about how we use your information, or want to exercise your rights over your information, you can contact us on:

Telephone: +44 020 8922 2304, +44 020 8458 2223

Email: dataprotection@jcare.org

We have appointed Hope and May as an external Data Protection Officer. To be in touch with our DPO, please contact us at dataprotection@jcare.org. This privacy notice is kept under regular review. If we make any changes to this Privacy Notice, we will notify you so that you can raise any concerns or objections with us. When making less impactful changes, we will update this notice and post a summary of the changes on our website.

3. Appendices:

[Appendix 1: Human Resources and Volunteers](#)

[Appendix 2: Service Users](#)

[Appendix 3: Fundraising & Marketing](#)

[Appendix 4: Websites](#)

4. Your Rights

Under data protection laws in the UK and EU, you have certain rights over the personal information that we hold about you. If you would like to exercise your rights, please contact any of the details listed above. Here is a summary of the rights we think apply:

a) Right to be Informed

You have the right to be informed as to how we use your data and under what lawful basis we carry out any processing. This Privacy Notice sets this information out, however, if you would like further information or feel that your rights are not being respected, please get in contact using any of the details listed above.

b) Right of Erasure – also known as the right to be forgotten

You may ask us to delete some or all of the information we hold about you. Sometimes, where we have a legal obligation we cannot erase your personal data.

c) Right to Object

You have the right to object to processing where we are using your personal information such as where it is based on legitimate interests or for direct marketing.

d) Right to have inaccurate personal information corrected

Inaccurate or incomplete information we hold about you can be corrected. The accuracy of your information is important to us, and we are working on ways to make this easier for you to review and correct the information that we hold about you. If any of your information is inaccurate or out of date or if you are unsure of this, please get in touch through any of the contact details listed in this notice.

e) Right of restriction

You have a right to restrict the processing of some or all of your personal information if there is disagreement about its accuracy, or if we are not lawfully allowed to use it.

f) Right to access your information

You have a right to request access to a copy of the personal information that we hold about you, along with the information on what personal information we use, why we use it, who we share it with, how long we keep it for and whenever it has been used for automated decision making. You can make a request for access free of charge and proof of identity is required. More information can be provided by the DPO if you email on dataprotection@jcare.org.

g) Automated decision making and profiling

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We currently do not undertake automated decision making in our HR department. We may profile information about our potential donors to tailor appropriate communications to them as well as helping us to improve the quality of our supporter's experience with us. You have the right to question the outcome of automated decisions and our profiling activities that may create legal effects or create a similar significant impact on you.

h) Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form so it can be easily transferred.

i) Right to withdraw consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

5. International Transfers

Where personal data is stored outside of the UK and the EU, safeguards to protect personal data may include but are not limited to the UK Addendum used in conjunction with the EU Standard Contractual Clauses (SCCs), or UK International Data Transfer Agreement (IDTAs). Such safeguards will be subject to Transfer Risk Assessments (TRAs).

6. Data Storage

All your information (including HR/ volunteers/ service users/ fundraising) will be stored in the data processors engaged by Jewish Care/ JAMI/CTL. We have the appropriate data processing agreements with each of these data processors.

7. Complaint to ICO

If you are unhappy with the way we process your data, you can also make a complaint to the Information Commissioner's Office (ICO) which regulates the use of information in the UK. They can be contacted:

By telephone on 0303 123 1113; or

In writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; or

By going online to www.ico.org.uk/concerns

Appendix 1: Human Resources and Volunteers

1. Staff/ Contractors/ Job Applicants

We collect your personal information from you when you apply for a job with our organisations. In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references. All employee details are held with HR. Volunteers' details are held by the Volunteers Department.

1. The information we collect about you includes:
2. personal details such as name, address, phone numbers;
3. name and contact details of your next of kin;
4. your photograph, your gender, marital status;
5. information of any disability or other medical information you have disclosed;
6. right to work documentation;
7. information gathered via the recruitment process such as that included in a CV, cover letter or application form, references from former employers, details of your education and employment history etc;

8. National Insurance number, bank account details and tax codes;
9. Information relating to your employment with us (e.g job title, job description, salary, terms and condition of the contract, annual leave records, appraisal and performance indication, formal and informal proceedings involving you such as letters of concern and disciplinary, disciplinary and grievance proceedings.);
10. Internal and external training modules undertaken;
11. Information on time off from work including sickness absence, family related leave etc;
12. IT equipment use including telephones and internet access.

Agency workers

Agency workers are sometimes known as “temps”. The agency through which they are employed is the data processor in respect of their personal data including their special category personal data.

As well as the purposes under 1. and below we may access your personal data under either contractual obligation or legitimate interest to:

- I. ensure you are adequately trained;
- II. validate your identity; and
- III. reconcile your timesheets.

2. Volunteers

When you engage with us as a volunteer, we may collect the following information about you and store it in our database:

1. personal details such as name, address, phone numbers;
2. ED&I information;
3. right to work documentation;
4. references from previous employment;
5. internal and external training modules undertaken ;
6. bank details for reimbursing any regular expenses.

Staff volunteers

How is the information used?

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment or your volunteering with us. Holding your personal data enables us to meet various administrative tasks, legal obligations or contractual/agreement obligations such as paying your salary and/or expenses, paying taxes, making necessary adjustment to facilitate your work for us, tracking your performance, administer leave etc.

Lawful basis for processing

We mainly use 'contractual obligation' as a lawful basis for processing your personal data for employees, job applicants and contractors. We mainly use 'legitimate interest' for Trustees and other volunteers (including first responders).

We may also have legal obligations to process and share your data, for example where we need to share salary information with HMRC or use some of your data to enroll you as a new employee on a pension scheme.

We may collect health data (special category of data) in order to manage sickness/absence procedures and determine reasonable adjustments. We may rely on Art 9 (b) in the field of employment – Condition 1 DPA 2018 (Health and Safety at Work Act 1974). We may rely on our legitimate interest for processing activities such as keeping supervision and appraisal records; using your image, bio on our website or marketing/fundraising materials to promote the charity.

When processing criminal records, we rely on the lawful basis of legitimate interest, and Condition 10 from Schedule 1, DPA 2018, ("preventing or detecting unlawful acts").

How long do we keep your data?

We only keep your data for as long as we need it, which will be at least for the duration of your employment/engagement with us though in some cases we will keep your data for a period of 6 years after your employment/engagement has ended. If you have applied for a vacancy but your application has not been successful, we will keep your data for only 2 years. Some data retention periods are set by the law. Please get in touch by contacting us if you want to know more about retention periods.

Confidentiality, Data Sharing and Safeguarding

Employees within our charity who are responsible for recruitment, administration of payments and contractual benefits and the carrying out of performance related procedures will have access to your data which is relevant to their function. Data in relation to your salary is shared with HMRC as part of our legal obligation. Data

may be shared with third parties for the following reasons: for the administration of payroll, pension, and/or other employee benefits.

To comply with our duty of care and safeguarding, we may need to pass some information raising safeguarding concerns to the authorities. We may also be required to share your information with police, CQC and other statutory bodies in certain situations. In such circumstances, we rely on legitimate interest or vital interest, read with substantial public interest and conditions from the DPA.

Appendix 2: Service Users/Residents

When you/your next of kin or your Attorney(s) engage with us and/or our services, or come into one of our homes, or residential living we collect information in a number of ways, depending on how you interact with us. This could be via our websites, completed contact/signup forms, signing in sheets, telephone calls, residence agreements or in writing or in person.

1. Personal data we collect and lawful basis for processing:

Jewish Care:

When you:	We collect:
Get in touch via our website and/or telephone	Contact information based on our legitimate interest. This allows us to respond to your enquiries.
Register interest in our services	Contact, customer, financial, health and family information on the basis of legitimate interest. This allows us to provide you with information on our services to you

When you:	We collect:
Sign up to our services	Contact and emergency contact, family, health, government identifiers, financial, racial or ethnic origin and religious beliefs/opinions information on the basis of contractual obligation. This is because you have entered into a contractual agreement with us for us to provide our services to you. The condition for using special category data in this way is for the provision of health and social care.
Receive our support, receive our services such as meals on wheels, or receive care from us	Contact, family, images and recordings (site CCTV), government identifiers, financial, health, racial or ethnic origin, religious beliefs/opinions, pledges, pledges for future donations or online donations and customer (marketing preferences) information. For this, we rely on the basis of contractual obligation, processing your personal information because you have entered into a contractual agreement with us for us to provide our services/care to you. The condition for using special category data in this way is for the provision of health and social care.

Photographs and videos to support your care

It is necessary for your care to obtain photographs and information about you which will be used to document your condition and to assist staff supporting your care needs. If necessary we will share this with other health and social care professionals regarding your care such as your GP, Pharmacists, Consultants, specialist nurses etc. where applicable.

Depending on the circumstances, we may collect your consent in order to process this type of data or we may rely on our legitimate interest.

Pictures and Videos

We may take videos and pictures during events or while you are a resident/service user where you may appear.

We use the footage for marketing and communication purposes. Depending on the circumstances, we may collect your consent in order to process this type of data or we may rely on our legitimate interest.

When you:	We may collect:
<p>Join our mental health support programme</p>	<p>Full name, contact details, GP contact details, emergency number, reason for your referral, mental health information, current support network and background history. This information is essential to us to provide you with the right service. Information is provided directly by yourself or by third parties (e.g., GP, parents, mental health provider) if you provide consent. We process your data under our legitimate interest, supported by Art 9 (2), d (not for profit body) or explicit consent (where such information is not necessary for the service)</p>
<p>Attend one of our educational or community events/ programmes (e.g., training, seminars, first responder training, drop-in sessions)</p>	<p>Name, phone, email, address and emergency contact number that you provide when booking for the event. We would process your information under our legitimate interest to administer your attendance. Your information may also be processed by the fundraising team – for more information please refer to Appendix 3 – Fundraising.</p>
<p>Join our counselling service (ex-Raphael): During the initial assessment phase</p>	<p>Name, DOB, contact details, marital status, any children, contribution paid for counselling, disability, GP details, any previous experience with counselling, mental and physical health information, relationship history, risk assessment via CORE 34 form, life history, support network and occupation data. During the counselling process, the counsellor will keep session and supervision notes. It is part of our contractual obligation (Art 6.b of the UK GDPR) to you to process the information above, supported by additional conditions of the UK GDPR and DPA 2018. As Raphael merged with Jami, we rely on contractual obligation for such transfer and processing such data.</p>

Incomplete enquiries

In the circumstances where you have made an enquiry, but this has not progressed to enrollment on one of our programmes, we will retain your data for only 1 year based on our legitimate interest. This is to allow us to continue to provide you with short-term support and signposting. Your information may also be processed by the fundraising team for profiling purposes – for more information please refer to Appendix 3 – Fundraising.

Pictures and Videos

During our programmes, we may take videos and pictures where you may appear. We use the footage for marketing and communication purposes. Depending on the circumstances, we may collect your consent in order to process this type of data or we may rely on our legitimate interest.

2. Data Sharing and Safeguarding: Jewish Care, CTL and Jami

We share your information with authorities when we are required by law, e.g. when data is requested by police to assist in investigating incidents, or emergency services when you are injured or unwell and need hospitalisation. We rely on legitimate interest for such purposes.

To comply with our duty of care and safeguarding, we may need to pass some information raising safeguarding concerns with the authorities. We may be required to share your information with police, CQC and other statutory bodies in certain situations. In such circumstances, we rely on legitimate interest or vital interests, read with substantial public interest and conditions from the DPA.

If we share your information with any partner organisations, we do this on the basis of legitimate interest or consent.

3. Feedback and Evaluation

There may, on occasion, be the opportunity to become involved in feedback and evaluation relating to our programmes. You are under no obligation to be involved in any evaluation and this will not impact upon the service you receive. We rely on our legitimate interest to contact you for this purpose.

4. Data Storage

We store your data in line with our retention policy and in accordance with the UK GDPR principles for data storage and retention- to know more about this, please reach out to us.

Appendix 3:

Fundraising & Marketing

1. How and when we collect your information

We collect information from you in a number of ways where you have shown support and/or interest in our fundraising activities. This could be when you make a donation or sign up to one of our fundraising events for example. We also collect information for marketing purposes where you have indicated your preference is to receive such contact from us.

2. Personal data we collect and the lawful basis for processing your data:

Philanthropy

In case of a generous donation or in order to identify potential high value supporters, we may use profiling and screening techniques. We may undertake research to gather information about you from publicly available sources; for example, Companies House, the electoral register, company websites, 'rich lists', social networks (such as LinkedIn, Facebook, Instagram, X) political and property registers and news archives.

When you:	Information is provided:	We may collect:
Make a donation	By you via a donation form which may be hard copy, on our website or via third party donation platform (e.g., Just Giving).	Name, email address, Gift Aid sign up, company name if the donation is made by an organisation, donation details, reason for engagement, postal address and contact preferences. We rely on our legitimate interest to process this data. If you agree that we can claim Gift Aid on your donations we are legally required to keep a record of the claim and your Gift Aid declaration.

When you:	Information is provided:	We may collect:
Sign up to our fundraising events	Mainly by you via our website forms, via third party platforms (e.g. Eventbrite or other online event registration companies) or in person during the events by paper forms.	Name, email address, company name if applicable, donation/ payment details, reasons to engage, postal address, contact preferences. We rely on the legitimate interest or contractual obligation to process this data. During these types of events, we may also take photographs and video recordings of people attending, where you may be included, and which we might share including on social media and we rely on our legitimate interest to process this data.
Show interest in supporting us (e.g. through a gift in your will or a pledge) and you decide to contact us	Mainly by you, via hard copy forms, online forms or during a phone/email conversation with us.	Occupation, title, details of any correspondence with us, DOB, fundraising appeals responses, event participation with us, details of your reasons to engage with us. We rely on our legitimate interest to process this data.
Register to use Wi-Fi at our premises	By you via a website form	Name, gender, age, email address and mobile number. When joining our Wi-Fi, Jami may ask for your consent to sign up to our newsletter.

We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations.

We rely on our legitimate interest in order to profile and screen your information. If you would rather we did not do this, please just let us know and we will, of course, respect your wishes.

Additionally, we sometimes ask existing supporters, trustees, and volunteers whether they would be prepared to open their networks up to us. An existing supporter may tell us about an individual previously unknown to us and facilitate an introduction. In this scenario we would check that the person in question is registered on the TPS or FPS and exclude them if their details have been registered on either of these registries. We would then advise the person who provided the introduction about our data responsibilities and ask them to ensure that the person they would like to introduce to us is happy for an introduction to take place. Following the introduction, we would direct the individual to this privacy notice and confirm their marketing consent preferences before communicating with them further. We will also share a link to our privacy notice in the footer of all of our email communications.

3. How long do we keep your data for?

If you have been part of profiling activities, you have never engaged with us and you have indicated that you are not interested in engaging with us for fundraising purposes, we will delete your data as early as possible. If you wish to know more about our data retention, please contact us.

4. Confidentiality – who do we share your data with?

Please rest assured that we will never sell your details to any third party. In addition, if we ever need to send data to a third party for processing (for example sharing data with our mailing/print houses for direct marketing appeals) we will make sure any company we use has signed a data processing agreement with us or they have other contractual obligations, so that they are bound to take care of your data in the same way we do.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations. We may also share personal information with our external auditors, for the auditing of our accounts.

If you have made a Gift Aid declaration, we may disclose the information you have provided as part of the declaration to HMRC for the purpose of reclaiming gift aid on your donation(s).

We do not share any special category data with anyone without your consent and we comply with National data opt-out policy.

We may share or disclose your personal information if we are required to do so by any law, regulation or court order.

Appendix 4: Fundraising & Marketing

1. How and when we collect your information

When you interact with our online platforms including our websites and social media accounts, we may collect information from you via the device(s) you used to interact with us. This applies across all digital platforms associated with both Jewish Care and Jami, with the applicable lawful bases for collecting this data below.

2. Lawful basis for processing your data – Jewish Care and Jami

When you visit our websites: On the basis of legitimate interest, we may, like many companies, automatically collect the following information when you visit our website: technical information, including the type of device you're using, your IP address, domain name, the date and time of your visit, the pages you accessed, documents you downloaded, etc.

Social Media

When you interact with us on social media platforms such as Facebook and Twitter, we may obtain information about you (for example, when you publicly tag us in an event photo). We process this data on the basis of legitimate interest in order to respond and engage with you effectively.

Cookies

Cookies are small text files placed on your device which uniquely identify your device. Cookies cannot be used to run programs or deliver viruses to your device. We use cookies and similar technologies to collect and store information (which may include your personal information) about how you interact with our website. We collect consent for any non-essential cookies.

Financial transactions on the website

We encrypt credit or debit card details on our online donation page which means that they cannot be intercepted and subsequently accessed. We redact all bank details that are provided to us during setting up Direct Debits and do not store credit card details.

All debit and credit card details are processed securely by our payment processing partner, according to the Payment Card Industry Security Standards. If you are donating or signing up to an event using a third party (e.g., Just Giving, Virgin Money giving), please also refer to the privacy notice published on their websites.

Links to other websites

Our website may contain links to other websites of interest. Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

