



**Together
we will end
homelessness**

Sharing your personal information with Crisis at Christmas:

- Why we ask for your personal details
- What we do with them
- Understanding your rights

Why we ask for and keep your information

When you join Crisis at Christmas time, we will have some personal information about you from our referrals like your name, date of birth, gender and CHAIN number if you have one. This information is really important as it helps us to give you the support you need, not only over the immediate Christmas period but for many people it is the start of a journey towards ending their homelessness.

We also use your information to make sure our services are working well and to help our work in changing government policies and reduce homelessness in the future. When we use your information in this way you will not be identified.

You don't have to give us information if you are uncomfortable in telling us certain things. But there will be some information you will need to give us if you want to use all of our services at Christmas hotels, be given hotel accommodation, or referred to other organisations who can help you during and after the immediate Christmas period.

Lawful Bases for Processing Your Information

Under data protection law, Crisis must have a lawful basis to collect and process information about you and other Christmas guests. This lawful basis may be different depending on the type of information you share with us, and how it is used. In the main we'll use your information with your consent, but there may be times when your explicit consent is not needed for sharing information with other organisations. These include:

- If we arrange hotel accommodation for you, we will share your information with the hotel based on **Legitimate Interest**. If sensitive information is shared, it will be under **Substantial Public Interest** to ensure the safety of both you and hotel staff, and consent is not required for this.
- If we facilitate ongoing support with local authorities after the Christmas support ends, we will again share your information under **Substantial Public Interest** to provide them with the necessary information for a seamless support service.
- Information may be shared to protect you or another person from harm under **Vital Interest**
- If the police approach Crisis to help prevent or detect a serious crime, we will assess the impact of sharing your personal information on the success of the investigation. If withholding information could significantly jeopardise a police investigation, we may share relevant and proportionate information without your consent.

- We may also be compelled to share information if we receive a **Court Order** directing us to do so.

How we keep your information safe

Your information - your 'data' - is stored securely, whether in physical or digital form. Our Christmas volunteers and Crisis staff use your information with care to support their work for you, both during Christmas and if you continue to work with us longer term.

How and when we collect your information

We initially collect information when you join us at Christmas time. If you are an existing Crisis Member, we may already have some information about you. Additionally, organisations you have engaged with outside Crisis, such as charities, hostel providers, advice centres, or local authorities, may provide us with information about you.

If you agree to Crisis supporting you after Christmas, the collected will be transferred to our Member database so that our Skylight teams understand your support needs as soon as you start working with them.

The type of information we keep about you

The type of information we keep could include:

- your name, date of birth and gender
- your contact details (phone and email)
- information about the sorts of help you want from us – and the reasons
- information about your physical and mental health – this may be needed to comply with our health and safety and safeguarding obligations, and also help keep you (& others) safe in hotel accommodation
- details of your immigration status
- information on your nationality
- your CHAIN number (if you have one)

How long we keep your information

We will keep most of your personal data for two years after your last attendance at a Christmas centre. If you agree to Crisis supporting you after Christmas and become a Crisis Member, we will keep your information for longer. The only exception to this is if you use our healthcare service where your data will be kept and stored in confidential storage for 8 years in line with NHS best practice. Only you can access this data, and once the 8 year period has passed your data will be destroyed.

If an incident occurs whilst you are being supported by us over the Christmas period we will keep that incident information for four years.

When the two-year period has expired or when you become a Crisis member, we will anonymise your personal information, and retain it in this non-identifiable format to enable us to continue our research and analysis into the causes of homelessness, and the impact we have on helping people out of it.

Your rights and your information

You have rights about how your information (data) is used. The laws that help you do this are the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

These laws mean:

- you can ask us to show you all of the information we have about you
- you can ask us to correct anything that you think is wrong
- you can ask us to erase your personal data from our systems
- you can tell us you are not happy about our reasons for collecting and processing your data
- where it is possible (and in limited circumstances) you can ask for your information to be transferred to another provider of a similar service
- you can change your mind where you have given us permission (your consent) to process and keep your information, you can withdraw this permission in some circumstances
- you can complain if you think we have broken the UK GDPR or DPA 2018 laws.

How to complain

If you have any concerns about how we are handling your data, we would like the opportunity to address them. Please contact our Data Protection and Compliance Officer at: data.protection@crisis.org.uk.

If you are not satisfied with our response or believe we are not handling your data appropriately, you can make a complaint to the Information Commissioner's Office (ICO). Complaints about data protection are handled by the ICO, and you can contact them at:

<https://ico.org.uk/concerns/handling/>

Crisis is a data controller for the purposes of the Data Protection Act 2018 and the UK GDPR.