

# **Privacy Policy for Young People**

Roundabout Young People's Privacy Policy – Updated April 2025

At Roundabout, we are committed to protecting and respecting your privacy. This policy explains how we will handle the personal information you provide.

## What is personal data?

Personal data is data relating to a living individual who can be identified from that data. Put simply, this can be things such as your name, your date of birth or a photograph. A person can also be identifiable from other information, including physical characteristics or your address.

### What personal data do we collect?

We may collect, store and process different categories of personal data about you during your time at Roundabout.

## When you first come to Roundabout, we may collect:

Your personal contact details (such as name, addresses, telephone numbers, and email address) Your date of birth and age

Identification references such as your National Insurance number and any benefit IDs.

Your emergency contact information and details

Copies of your identification and ID photos

# We may also collect sensitive personal data such as information about your:

Ethnic origin and nationality Religious beliefs Physical or mental health Sexual orientation Criminal offences

## If you are staying in one of accommodation services, we may collect:

Housing data (e.g. accommodation history and license agreements)

Housing benefit claims and correspondence

Client Incident reports, complaints and feedback forms

**CCTV** footage

# To carry out our activities and support you whilst you're engaging in our services, we may collect:

Data relating to your support work (e.g. case notes and risk/needs assessments)

Data relating to external support agencies who have or may help you (e.g. local authorities and health practitioners)

Your health, medical and appointment information

Your employment and skills data, (e.g. CV's and education/employment information)

Your income data including benefits, income maintenance, client employment, grant/bursary applications and rent payments.

## Why do we need your personal data?

We collect personal data to help us to provide you with services. Depending on how you interact with us, we may process data for the following reasons:

to provide you with advice and support that you have requested or been referred to

to record personal details shared during conversations

to manage services Roundabout is providing for you

to obtain information to improve Roundabout's services and user experiences

to address and resolve complaints about Roundabout and our services

to ensure safeguarding of all our clients and others

to contact other professionals e.g. the housing office to secure your benefits

to comply with applicable laws and regulations, and requests from statutory agencies

to comply with our contractual obligations to our funders

Roundabout do sometimes share anonymised data

## What Lawful Basis do we use to collect, process and store personal data?

Under the General Data Protection Regulation (2018), we must declare which 'Lawful Basis' we use to collect and use your personal data.

## Our lawful basis is:

#### 1. Consent

We will always obtain consent:

When taking and using photos, videos and other audio

Using case studies for promotional activity

These photographs, video and/or audio and case studies may then be used in posters, advertisements, newspapers, magazines, videos and/or other promotional material including websites, either now or in the future.

Roundabout promotes its work by using real stories from the young people we support.

Photos/videos/audio recordings/case studies may be used to promote Roundabout and to help the public understand what Roundabout does and also understand some of the issues affecting young people.

Signed consent forms will be held in a secure location. You can withdraw your consent at any time.

#### 2. Contract

If you are staying in our accommodation, you will have a License Agreement with us confirming the terms of your tenancy.

## 3. Legal Obligation

If you are staying in our accommodation, we have a legal requirement to keep records of your rent payments for HMRC.

## 4. Legitimate Interest

All other personal data may be legally collected and used if it is necessary with a legitimate interest for Roundabout and if its use is fair and does not adversely impact your rights. We will always consider if it is fair and within your reasonable expectations to collect, process and use your data.

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.

# How long do we keep personal data?

We keep your information for no longer than is necessary for the purposes it was collected for.

The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and reporting purposes).

We review our retention periods on a regular basis.

## **How is personal data shared?**

Our staff and volunteers at Roundabout will have access to your information to provide the services you have requested.

Our database to process client data is called In-Form, a cloud-based client management system provided by Homeless Link. They will only use the data to carry out the required task and will not share it or store it.

We may also share information with the following organisations:

Local and national authorities: to report performance indicators on homelessness to central government and to cross reference funding and outcomes for young people. We only share your information for these purposes.

<u>Police or Social Services:</u> we are under various legal obligations to share certain data for the prevention and detection of crime, for example the sexual offenders register or to prevent benefit fraud.

## **Website Visitors**

We monitor how people use our website so we can improve it, using Google Analytics.

Google Analytics places cookies on your computer to enable Google to provide us with activity reports relating to the site. Google uses this data only to provide us with information on how users use the site and does not associate your IP address with any other data held by Google. Your IP address is a unique string of numbers separated by full stops that identifies each computer using the Internet Protocol to communicate over a network. The information generated by Google cookies about your use of the platform (including your IP address) will be transmitted to and stored by Google on servers in the United States.

You may refuse these cookies by selecting the appropriate settings on your browser or by downloading and installing the browser plug-in available under <a href="https://tools.google.com/dlpage/gaoptout?hl=en-GB">https://tools.google.com/dlpage/gaoptout?hl=en-GB</a>

Our website <u>www.roundabouthomeless.org</u> contains links to other websites. This privacy policy applies only to this website, so when you are moving to another site which collects personal information you should always read the privacy policy relating to that website.

## Your rights

<u>Right of Access</u> – You have the right of access to information we hold about you. We have up to one month to provide you with the information and at no cost to you. We will provide you with a copy of the information we hold that relates to you.

<u>Right to rectification or erasure</u> – If you feel that any data we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you feel that we are unlawfully processing your data.

<u>Right to Restriction of processing</u> – You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have requested its erasure, or where we don't need to hold your data anymore but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.

<u>Right to object</u> – you have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.

## If you would like to exercise any of these rights, please contact:

Geoff Ticehurst Head of Central Services Roundabout The Circle, 33 Rockingham Lane Sheffield, S1 4FW

0114 253 6789 geoff.ticehurst@roundaboutltd.org

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office.