Last review date:	16 September 2026	**Next review date:**	15 September 2027	**Last reviewed by:**	**SM**
Responsible Person:	Shelley Marshall				

Privacy Notice

Our contact details:

More Than Words Advocacy CIC

Address: Unit B Sovereign Business Park, Kingscroft Court, Wigan, WN1 3AP

Phone: 01942 735426

Email: info.mtwadvoc@gmail.com

Website: www.morethanwordsadvocacy.co.uk

Statement about personal data:

Personal information provided to us to be distributed indiscriminately and for that reason it will be:

- fairly and lawfully processed in accordance with the Data Protection Act 2018
- obtained only for specified lawful purposes
- adequate, relevant and not excessive
- accurate and, where necessary, kept up-to-date
- kept no longer than is necessary for its purpose
- processed in accordance with the Data Protection Act
- secure
- not transferred to any third party

Type of personal information we collect:

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (e.g. names, addresses, email addresses, phone numbers, dates of birth, likes and dislikes)
- Data we need to support people and keep them safe (e.g. health information)
- Employee data (e.g. NI numbers, bank details, passport details, Covid records)
- Web data (e.g. data submitted via Contact Us)
- Data submitted in online or hard copy questionnaires
- Data included in our social media posts (e.g. photographs and video footage)

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you or by a professional for one of the following reasons:

- To keep the person we are supporting safe.
- So we are aware of any medical conditions.
- So we have contact information in the event of an emergency.
- To comply with HMRC requirements.
- To enhance the marketing of our services.
- To book places on our events.

We also receive personal information indirectly, from the following sources in the following scenarios:

- From social workers, health care and other professionals, when we need to be aware of a person's support and health care needs, or if there are safeguarding concerns.
- From families, when we ask for information that we need to be able to support people who use our services.
- From referees, when you are applying for a job working for us.
- From payroll, when we are processing salaries.
- From the Department of Work and Pensions, when there is an issue with someone's employment.

We use the information that you have given us in order to:

- contact you in response to an online enquiry
- register you for an event being organised by us
- contact you to provide you with further information after you have registered for an event
- send you invoices, process payments and verify financial transactions
- provide a personalised service to you
- record any contact we have with you
- send you our e-newsletter
- liaise with relevant health and social care professionals.

We may share this information with other organisations where we have a duty to disclose or share it due to safeguarding or law enforcement purposes. We will always tell you when we have to share your information.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- **Your consent.**
  You can remove your consent at any time by contacting our Operations, Compliance & Quality Manager on 01942 735426.

- **We have a legal obligation.**
  For example, we need to provide certain information to HMRC, or we must share concerns with law enforcement bodies.

- **We have a vital interest.**
  We have a duty of care to those we are supporting.

How we store your personal information

Your information is securely stored.

Electronic information is stored within our network infrastructure, with access restricted to authorised personnel only. Our premises are secured by intruder alarms and only authorised personnel have authority and access to arm and disarm the alarm system.

MTW will hold personal information on its systems for as long as individuals use the service and will remove it in the event that the purpose has been met. We will ensure that all personal information supplied is held securely, in accordance with the Data Protection Act 2018.

No laptops or removable media of any kind containing personal data will be taken outside our secure premises without encryption. Any personal data being sent electronically to or from third parties will be password protected and sent via a secure server wherever possible.

The following security measures are in place to protect against the loss, misuse and alteration of personal data under our control:

- paper based records are stored in secure filing cabinets, with access restricted to authorised personnel only and filing cabinets are locked when not in use;
- modifications to personal data are logged and monitored;
- access to personal data stored electronically is restricted to authorised personnel only via a secure password;
- automatic electronic data back-ups are undertaken by our Cloud provider;
- passwords for electronic data have a minimum length of 8 characters with complexity enforced to ensure the security risk is as low as possible:
- computers owned and managed by MTW will have up-to-date anti-virus software installed and will be regularly checked for security updates.

We dispose of or delete personal data upon the termination or expiration of a service agreement unless it is necessary to retain the data by law. Hard copy documents are always shredded with a cross-shredder.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.

- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us if you wish to make a request please write to Shelley Marshall, Operations, Compliance & Quality Manager, More Than Words, Unit B, Sovereign Business Park, Kingscroft Court, Wigan, WN1 3AP.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us by writing to the Operations, Compliance & Quality Manager, More Than Words, Unit 2 B Sovereign Business Park, Kingscroft Court, Wigan, WN1 3AP.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk