

WDP Website Privacy Notice

Who we are

Westminster Drug Project, more commonly known as 'WDP' is a vibrant and innovative drug and alcohol charity committed to helping those who are affected by substance misuse. Providing support to individuals, their families and the wider communities across London, the North West, and East of England.

Privacy Notice

The General Data Protection Regulation (GDPR) 2016 requires all Data Controllers to inform individuals how their personal data will be processed and held. This privacy statement explains how we use any personal information we collect about you when you use this website and access our services.

Registration as Data Controller & Contact Details for the Registered Data Protection Officer

Our legal name is registered as Westminster Drug Project.

Our registered offices are at:

18 Dartmouth Street
London
SW1H 9BL

Our contact details are:

Tel: 0207 421 3100

Website: www.wdp.org.uk

WDP's Data Protection Officer is:

Caroline Ogdee,
Senior Quality & Information Governance Officer

If you have any queries regarding the information we hold about you or have questions relating to our privacy statement you can contact the Senior Quality & Information Governance Officer on the below details.

Tel: 0207 421 3143

Email: caroline.ogdee@wdp.org.uk or by post at the address above.

What we collect and why

WDP is a charity within the Health and Social Care sector commissioned by local authorities to provide treatment support. Our legal bases for processing data are defined in the table below:

Applicable Legislation	Our reason for processing
Article 6 (1) (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;	<ul style="list-style-type: none"> Managing contracts with individuals e.g. employees Agreements for individuals volunteering in WDP services
Article 6 (1) (c) processing is necessary for compliance with a legal obligation to which the controller is subject;	<ul style="list-style-type: none"> Managing TUPE transfers for employees Transfer of service user data between providers Submission of Drug Rehabilitation Requirement and Alcohol Treatment Requirements reports for court proceedings Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information
Article 6 (1) (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;	<ul style="list-style-type: none"> WDP is a not-for-profit organisation commissioned by local authorities to provide health care services based upon statutory requirements under the Health and Social Care Act 2012. Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information
Article 6 (1) (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	<ul style="list-style-type: none"> Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information
Processing Special Category Data	
Applicable Legislation	Our reason for processing
Article 9 (2) (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;	<ul style="list-style-type: none"> Employment and safeguarding purposes Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information
Article 9 (2) (f) processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity;	<ul style="list-style-type: none"> Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information
Article 9 (2) (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;	<ul style="list-style-type: none"> Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information
Article 9 (2) (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;	<ul style="list-style-type: none"> WDP is a not-for-profit organisation commissioned by local authorities to provide health care services based upon statutory requirements under the Health and Social Care Act 2012.
Article 9 (2) (i) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.	<ul style="list-style-type: none"> To design and contribute to research projects which will inform how services within the sector are commissioned and delivered going forward To produce new and exciting innovations which enhance WDP's existing service delivery.
Article 9 (2) (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.	<ul style="list-style-type: none"> To design and contribute to research projects which will inform how services within the sector are commissioned and delivered going forward To produce new and exciting innovations which enhance WDP's existing service delivery. Legal proceedings and obtaining advice for prospective legal proceedings, for establishing, exercising or defending legal rights or where WDP has a specific legal requirement for processing information

How we use your information

The personal information collected about you, or the individuals that you are referring to our services, will be used to help us implement recovery treatment packages that are tailored to support the needs of our service users' recovery and to support the continued development and improvement of the services we provide.

Information submitted through our online enquiries form will be reviewed and shared with the WDP department or service identified as appropriate for processing the information that you have provided.

Processing of information includes the following activities:

Service User, Family Members and Carer Data

- Storing hard copy (paper) and soft copy (electronic) records of data in an archived format when no longer required for processing.
- Storing data relating to deceased individuals who have accessed services through WDP.
- Writing to GPs and informing them of service user treatment with WDP or informing them of new registrations.
- Working with criminal justice services and providing treatment assessments for service users.
- Working with probationary services where service users are required to take part in a criminal justice requirement.
- Working with prison services for continued treatment.
- Working with safeguarding teams to ensure individuals at risk receive the appropriate support.
- Working with pharmacies, monitoring and processing data in relation to needle exchange and supervised consumption programmes.
- WDP shares information with the National Drug Treatment Monitoring Service (NDTMS). This information is collected on behalf of Public Health England (PHE) and is used to monitor numbers accessing treatment support.
- Designing and contributing to research and innovation projects, to support the continued improvement of treatment and services.
- Local authorities for monitoring, evaluating and reviewing substance misuse treatment services.
- Transferring data to new substance misuse treatment providers at the start or end of a service contract.
- Recording and monitoring incidents, accidents and complaints for internal investigations and audits.

Employee Data

- Staff administration
- Payroll and pension administration

- Staff wellbeing
- Health administration and services
- Equal Opportunities monitoring
- Surveying of staff to support organisational initiatives
- Business management and planning
- Workforce planning, and the provision of facilities such as estates, car parking and IT/telecoms
- Accounting and auditing
- Prevention/detection of fraud, crime and or prosecution of offenders
- Education and training
- Management of organisational change
- Supporting emergency preparedness and business continuity
- Compliance with legal obligations

Your right of access

You have the right to ask us for copies of your personal information. This right will always apply. Please be aware that there are some exemptions, which means you may not always receive all the information we process.

One way to do this is to download and fill out our Subject Access Request Form, which asks for all the information we would need to process your request.

For more information about this right, we recommend you obtain further information from <https://ico.org.uk/your-data-matters/your-right-of-access/>

Right to be informed

Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly.

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

Should WDP receive a request to correct any data, we will take reasonable actions and will investigate if the data is accurate. This will include a review of the records held and processes followed when recording the data. Upon completion of the review, WDP will:

- Advise you of the outcome in writing
- Confirm the outcome of the investigation, detailing the actions that have been taken, e.g. confirm if the information has been corrected or if not, the reason why the rectification has not taken place
- Where information has been shared with other organisations and then later rectified, share the details of the rectification with the applicable parties.

In order for us to complete this process, we would ask that you provide your reasons and where possible any evidence to support your request for rectification.

Further information relating to rectifying your data can be found at: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/>

Access and retention

We will hold your personal data on our systems for as long as you are a user of WDP services and for as long afterwards as is necessary to comply with our legal obligations. This applies if you enter treatment with WDP or if you have submitted a compliment or complaint.

We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data and will retain your personal information in an archived format as directed by our organisational Records Management and Retention Policy.

Where your information relates to a general enquiry about WDP services, information will be removed from our systems after a period of six months.

Right to data portability

This right is only available where the legal basis for processing under the GDPR is consent, or for the purposes of a contract between you and WDP. For this to apply the data must be held in electronic form. The right is to be provided with the data in a commonly-used electronic format.

Right to object

You have the right to object to the processing of personal data about you on grounds relating to your situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitors/users of the website and compile statistical reports on website activity.

For further information visit <https://www.aboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner if you are not happy with any aspect of WDP's processing of personal data or believe that we are not meeting our responsibilities as a data controller.

The contact details for the Information Commissioner are:

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

Website: www.ico.org.uk