



Mind in Bexley Data Protection and Privacy Policy

Updated October 2019

Our Privacy Promise

Transparency – We will always tell you what data we're collecting about you and how we use it. We only share your data with trusted partners and will never sell your data.

Security – We are committed to always follow industry best practices to ensure your data is stored safely and securely. We protect the confidentiality, accuracy and availability of the information we collect about you.

Control – We will always give you control over the communication that you receive from us. You can choose whether you want to stop receiving Mind in Bexley communications.

Trust - We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used.

This Policy sets out how we collect, use and store your personal information (this means any information that identifies or that could identify you).

1. Who we are

Here at Mind in Bexley, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 2018 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Admin Office by:

- Writing to Mind in Bexley, 2a Devonshire Road, Bexleyheath DA6 8DS
- Calling us on 020 8303 8932 Option 4
- Emailing info@mindinbexley.org.uk

2. How we collect information about you

In order to ensure that we can help people experiencing a mental health problem get the necessary support we want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event, become a member or make a donation.

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities, register with us for training or an event, make a donation to us, ask a question about mental health, purchase something, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, make a purchase from our community cafes, or get in touch through the post, or in person.

When you interact with us through partners or suppliers working on our behalf: This could be through being eligible for clinical supervision, therapy sessions or as a volunteer counsellor which is delivered through trusted individuals working for us or on our behalf and always under our instruction.

When you interact with us through third parties: This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

When you visit our website: We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you.

3. Information we collect and why we use it

Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making donation), as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event or any of the other ways to interact with us.

It is important that you provide us with accurate information so that we can provide you with the most appropriate care. We use information we hold about you for the following purposes:

- Providing treatment services to you (including communicating with you, your GP, your referrer, other medical advisers as appropriate);
- Retaining as part of your health record for 20 years after the end of your treatment
- Any information we use for other purposes will be converted into a form in which you cannot be identified and will be kept strictly confidential. This includes information;
- To improve the quality of our service by carrying out clinical audit;
- For analysing how our services are used and how we may improve our services in future;
- To teach and train healthcare professionals;
- To investigate complaints, legal claims or internal incidents
- To assist in research and development
- For compliance with any statutory or other regulatory requirements by providing anonymous information
- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- To comply with legislation.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide goods and services you have requested.

We may also use your personal information:

- To contact you about our work and how you can support Mind
- To invite you to participate in surveys or research.

Sensitive Personal Information:

If you share your personal experience or the experiences of a friend or relative, we may also collect this health information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy. You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work telling people's personal stories about mental health.

DBS Checks

All organisations using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust and who are recipients of Disclosure information must comply fully with the DBS Code of Practice. Mind in Bexley's Data Protection Policy fulfils this requirement. As an organisation using the DBS system to help assess the suitability of applicants for positions of trust, Mind in Bexley complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

Disclosure information is kept separately and securely, in a confidential folder in the Senior Support Manager's locked filing cabinet, with access strictly controlled and limited to those who are entitled to see it as part of their duties. In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorized to receive it in the course of their duties. Mind in Bexley maintains a record of all those to whom Disclosures or Disclosure information has been revealed and recognizes that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Disclosure information is only used by Mind in Bexley for confirming the suitability of potential staff and volunteers. Once a staff recruitment or volunteer placement decision has been made, Mind in Bexley does not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months.

Once the retention period has elapsed, Mind in Bexley will ensure that shredding immediately destroys the Disclosure information. Mind in Bexley will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the individual, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment or placement decision taken.

4. Legal basis for using your information

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you. However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Mind in Bexley to process your information to help us to achieve our vision of ensuring that everyone experiencing a Mental Health problem gets both support and respect. Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance. Some examples of where we have a legitimate interest to process your

Personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

5. Marketing

We will only contact you about our work and how you can support Mind in Bexley by phone, email or post, if you have agreed for us to contact you in this manner. However, if you have provided us with your postal address we may send you information about our work and how you can support Mind by mail unless you have told us that you would prefer not to hear from us in that way. You can update your choices or stop us sending you these communications at any time by contacting info@mindinbexley.org.uk or clicking the unsubscribe link at the bottom of the relevant communication.

6. Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers) at Mind in Bexley so that they can support you. We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

Mind in Bexley may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. Some examples of where we may share your information are with our partners who help us to process donations and claim Gift Aid and our partners who help us offer services. We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

7. Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

8. Keeping your information safe

We take looking after your information very seriously. We have implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site. Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that Websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of other websites.

9. How long we hold your information for

We only keep data for as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

We retain mental health records for 20 years after the end of treatment. Other records are kept for as long as legally required.

10. Your rights

You have various rights in respect of the personal information that we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at Mind in Bexley on 0208 303 8932 Option 4 or e-mail us at: info@mindinbexley.org.uk or by writing to: Mind in Bexley, 2a Devonshire Road, Bexleyheath DA6 8DS

- **Access to your personal information or subject access:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **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.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** We do not currently carry out any automated decision- making.
- **Timescales:** Mind in Bexley will comply with a GDPR request without undue delay and at the latest within one month of receipt of the request or (if later) within one month of receipt of: any requested information to clarify the request or any information requested to confirm the requester's identity

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

11. Monitoring

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

12. Cookies Information

We do not collect cookies directly on our website, but do use Google Analytics

The Mind in Bexley website is integrated with Google Analytics, which tracks website data. To do this, Google Analytics uses cookies to monitor visitors who are browsing through the site. We analyse this data in order to improve the website. For example, using cookies we can see how which pages a user is interested in. We then use such analysis to make improvements to the site in order to improve the user experience in the future.

<https://policies.google.com/privacy?hl=en-GB&gl=uk>

Signed by

A handwritten signature in black ink, appearing to read "D Palmer", written in a cursive style.

David Palmer
Chief Executive

October 2019

Ratified by the Board of Trustees
Review by: January 2021