

# Privacy Policy

Version 4

February 2024



Title	Privacy Policy
Version	4
Date first published	September 2018
Previous review dates	September 2023, February 2024
Next review date	February 2027
Review schedule	This policy will be reviewed every 3 years, or in line with organisational or legislative changes
Responsibility	Executive Leadership Team
Responsibility for development, review and implementation	Data Security & Protection Lead (Business Development Director)
Target audience	All staff, volunteers, the Board of Trustees, clients, students on placement with Mind in Bradford, visitors to Mind in Bradford, job and volunteer applicants and third-party support providers
Accessibility	Staff: People HR Volunteers: People HR Clients and others: Mind in Bradford website If you would like this policy in another format, such as large print or audio, please request one by contacting us on 01274 730815 or at email <a href="mailto:admin@mindinbradford.org.uk">admin@mindinbradford.org.uk</a>
Associated policies	Client Code of Conduct Data Protection Policy Privacy Policy Volunteer Policy Safeguarding Adults Policy Safeguarding Children Policy  In addition, supported by the following Procedures or Guides: Information Security Processes Data Quality Processes Records Management Processes Information Breach Processes Subject Access Requests Processes Information Systems Guide for Staff and Volunteers



Your local mental health charity in Bradford, Airedale, Wharfedale and Craven

## Privacy Policy

We want everyone who comes to us for support or who decides to support us to feel confident and comfortable with how any personal information they share will be looked after and used.

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

Our Policy may change so please remember to check back from time to time.

This version was last updated on 1 February 2024. Where we have made any changes to this policy, we will make this clear on our website.

For further information about our privacy practices, please contact Mind in Bradford by writing to Data Security and Protection Lead, Mind in Bradford, 28 Manor Row, Bradford, BD1 4QU or emailing [admin@mindinbradford.org.uk](mailto:admin@mindinbradford.org.uk)

## Who we are

Mind in Bradford is a registered charity that specialises in supporting people with their mental health; from low level prevention services to highly supported services for people with complex needs. We are affiliated to national Mind, the largest Mental Health Charity in England and Wales.

Our registered charity no. is 1142357 and our registered company is no. 7504966.

We are registered with the Information Commissioner's Office in accordance with the General Data Protection Act. Our Registration number is ZA135003.

We are committed to protecting your personal information and making every effort to ensure that it is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of 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.

## How we collect information about you

Everything we do is aimed at ensuring we can help people experiencing a mental health problem get both support and respect. We want to make sure you receive the communications that are most relevant to you, be it through accessing our support in person or virtually, visiting our website or receiving emails, post or phone calls.

We collect information from you in the following ways:

**When you interact with us directly:** This could be if you access our services in person or virtually, make a service referral online or offline, ask a question about mental health, ask us about our activities, register with us for an event, donate, purchase something, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you visit us, phone us, use the communication features on our website, use our social media, contact us via post or send an email.

**When you interact with us through third parties:** This could be if you provide a donation through a third party such as Just Giving and provide your consent for your personal information to be shared

with us.

**When you visit our website:** We use Google Analytics to gather information which might include your gender, age range, country of residence, length of visit, which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use “cookies” to help our site run effectively. There are more details below – see ‘Cookies’. We use this information to personalise the way our website is presented when you visit, to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

## **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 payment details (if you are making a purchase or donation), as well as any information you choose to provide during the course of a referral or support enquiry.

Additionally, some of our services may require you to provide your NHS number, your carer/parent/legal guardian’s name and contact information, and details of your health care providers, school, and other relevant services/professionals.

### **We will mainly use this information to:**

- Manage any referrals into our services and any subsequent information relating to your support enquiry.
- Inform you about appropriate changes to our services or support that are relevant to you.
- Provide the services or goods that you have requested.
- Seek your views or comments on the services we provide.
- Process your donations or other payments
- Claim Gift Aid on your donations and verify any financial transactions.
- Update you with important administrative messages about your donation, an event or services or goods you have requested.
- Comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- Keep a record of your relationship with us.
- Administer the volunteering arrangement, where you volunteer for us

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event, provide services you have requested, or understand how we can improve the quality of our services.

We may also use your personal information to contact you about our work and how you can support Mind in Bradford.

### **Sensitive personal information**

If you share your personal experience or the experiences of a friend or relative, we may also collect this health information (Sensitive Personal 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.

### **A special note about the sensitive personal information we hold:**

UK Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive personal information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you contact us through our helpline or via more general communications such as through our social media accounts, via telephone or email, you may choose to provide details of a sensitive nature.

### **We will only use this information:**

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it on our website or in other media.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
- We want to better understand our supporters, your preferences and your needs – so we may research information already in the public domain (or get help from a third party) so that we only contact individuals and organisations we genuinely think are interested in supporting our work. This will help us tailor our communications and maximise funds raised at the lowest possible cost.

### **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 (for example, because you have placed an order on our website). 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 Bradford 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 consider your rights and interests and will not process your personal information if we feel that there is an imbalance.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we consider your rights and interests. Some examples of where we have a legitimate interest to process your personal information are where we respond to your request for information about our work or services; send out newsletters about our work; use your personal information for data analytics or contact you to ask for feedback to improve our services.

### **Marketing**

We will only contact you about our work and how you can support Mind in Bradford by phone, email or text message if you have agreed for us to contact us in this manner.

When you follow our social media accounts, you may receive private messages, notifications and other digital marketing from us. To opt out, please unfollow our account.

If you have provided us with your postal address we may send you information about our work and how you can support Mind in Bradford 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 [communciations@mindinbradford.org.uk](mailto:communciations@mindinbradford.org.uk) or clicking the unsubscribe link at the bottom of the relevant communication.

### **Making our work more unique to you**

We want to improve how we communicate with you and the information we provide through our website, services, products and information. To do this we sometimes use profiling and screening methods so that we can better understand our supporters, your preferences and needs to provide a better experience for you.

We may carry out targeted fundraising activities using profiling techniques based on the information that we hold about you. We may also work with third party organisations who provide additional insight, this may include providing wealth screening information or general information about you that is publicly available.

This information can be appended to the information that you have provided which allows us to use our resources more effectively by better understanding the background of our supporters and making appropriate requests based on what may interest them and their capacity to give.

You can of course opt out of this activity at any time. To do this please contact Mind in Bradford by writing to the Data Security and Protection Lead, Mind in Bradford, 28 Manor Row, Bradford, BD1 4QU or emailing [admin@mindinbradford.org.uk](mailto:admin@mindinbradford.org.uk)

### **Sharing information**

The personal information we collect about you will mainly be used by our staff (and volunteers) at Mind in Bradford 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 Bradford 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 fulfilment partners who help to create and send information to you to reduce our costs, with our partners who help us to process donations and claim Gift Aid and our partners who help us to manage our social media accounts.

When we enter into contracts with service providers, we require them to comply with UK Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

Where we act as a signpost into a service via a provider that we have no direct contractual responsibility over, we recommend you check their approach to privacy and data security before entering into any agreement.

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.

Sometimes we may need to share your information with other trusted people involved in your life, such as health workers, social workers, youth workers, your parent/s or carer/s, the police or your school. Where possible, we will always seek your permission before sharing your information, and we will not share against your wishes unless we are worried about your safety, or the safety of someone else.

## **A special note about the NHS Mental Health Services Data Set**

In some instances, we are required to share some of your information with NHS Digital for the NHS Mental Health Services Data Set (MHSDS). It is not shared with your GP, and it does not include case notes, themes of support, goals you are working towards or safeguarding information.

NHS Digital uses the information to enhance the quality of mental health care, reduce inequalities and support service improvement. You have some control over setting opt out preferences for how your data is used by NHS Digital. To find out more about this, please visit <https://www.nhs.uk/your-nhs-data-matters/>.

## **Keeping information safe**

We take looking after your information very seriously. We've 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.

In relation to the delivery of our services, the information you provide will be stored electronically in our password protected database which only Mind in Bradford staff can access. We use a system called MYMUP to store client records and have done so exclusively since August 2021.

In some services, we will store your data digitally on SystemOne (an NHS-approved system) but we'll tell you if this is the case.

Unfortunately, the transmission of information using the internet is not completely secure. 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 advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

Most payment information is received and processed through external websites by trusted, secure third parties such as Stripe and JustGiving. Any payment information which we receive on our website is passed to, and processed securely through, our processing partners, all who adhere to the Payment Card Industry Security Standards and all relevant laws including data protection.

## **How long we hold information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, we only retain client records on MYMUP for 3 years from date of last entry, and nothing from prior to the adoption of this system).

## **Your rights**

The law gives you certain rights in respect of the personal data that we hold, which you should be aware of:

- You have the right to obtain your personal data from us except in limited circumstances. Where we provide it, the first copy will be free of charge, but we reserve the right to charge a small fee for additional requests;
- You have the right to require us to rectify any inaccurate personal data we hold concerning you;
- Considering the purposes of the processing, you may also have the right to have incomplete personal data completed, by means of providing a supplementary statement or otherwise;
- You have the right to require us to erase your personal data on certain limited grounds (including where they are no longer necessary for the purpose for which they were collected or where you withdraw your consent and there is no other legal ground for the processing);
- Where we process personal data either on the basis of consent or contractual necessity, you provided the personal data to us, and we process that personal data by automated means, you have the right to require us to give you your data in a commonly used electronic format;
- You have the right to object to our processing of personal data which we process on the grounds of our legitimate interests, although we do not always have to honour your objection – we can refuse to cease processing where we have a compelling legitimate ground that outweighs your interests, or if we need the data to bring or defend a legal claim;
- You have the right to require us to restrict the processing of your personal data on certain grounds, including where:
  - (a) you contest the accuracy of the personal data and want us to restrict processing of your personal data while we verify its accuracy;
  - (b) the processing is unlawful, but you request a restriction of the processing rather than erasure;
  - (c) we (as controller) no longer need the data for the purposes of the processing, but you have told us you require us to retain that personal data for you to establish, exercise or defend legal claims; or you have objected to us processing your personal data on grounds of legitimate interests and want us to restrict processing of your personal data while we consider your objection.

If you would like to exercise any of these rights, please contact us by email at [admin@mindinbradford.org.uk](mailto:admin@mindinbradford.org.uk) or by writing to Data Security and Protection Lead, Mind in Bradford; Kenburgh House, 28 Manor Row, Bradford, BD1 4QU.

## **Cookies and other log files**

‘Cookie’ is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can’t be used to identify you.

### **How do we use cookies?**

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

### **The cookies we use:**

We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide.

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.



- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. As such if you visit the Mind in Bradford website you may then be more likely to see adverts about Mind in Bradford's work on other websites as your browsing suggests that this is an area of interest.

You can opt out of all our cookies (except the strictly necessary ones). Find out how to control and delete cookies in your browser by visiting <https://www.aboutcookies.org/>. But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

Another type of information that we collect is standard log files on our web server. Log files are not personal data but are types of information that help us to assess usage and usability of our website. This information may include the IP address of your computer.

If you have any questions about how we use cookies or other log files, please contact us via [admin@mindinbradford.org.uk](mailto:admin@mindinbradford.org.uk)

### **Embedded content from other websites**

Pages on our website site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website (Vimeo, YouTube etc).

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

### **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.

**Should you have any complaints or issue with our treatment of your personal data, you may lodge a complaint with the Information Commissioner's Office, <https://ico.org.uk>.**