

Reading Association for the Blind (RAB) Data Protection Policy.
Policy approved July 2022
Next review date July 2024

This policy was created with reference to the data Protection Information Commissioner's guidance www.ico.gov.uk

Introduction

RAB respects the private lives of individuals and recognises the importance of safeguarding personal privacy. RAB appreciates the responsibility of storing personal information, considers the protection of personal data to always be a priority and a consideration throughout our RAB services.

This policy provides guidance for all RAB staff, trustees and volunteers.

The guidance outlines the considerations and management of personal data.

Specific instructions for each block of information are detailed on a data control sheet, and attached as appendices. The RAB Privacy Statement is also attached as an appendix. These do not form part of the policy as they will be amended as required.

A review of the management of personal data should be included within staff, supervision meetings.

Information Commissioners Data Protection Register

RAB is registered with the ICO.

Registration number ZA341758

Registration Date: 12th April 2018 (renewed annually on this date henceforth)

Managing the protection of personal data

Any staff member considering the creation of a new store of data, reviewing the storage of existing data, or using existing data in a new way will consider the following questions.

The responsible manager will complete a data control sheet which will be added to the appendices, and ensure all relevant staff and volunteers are aware of the data control sheet and understand its contents.

1. *Is the information personal data?* If the information is going to be processed by computer or as part of a filing system, and it relates to an individual who can be identified, then it is personal data and covered by this policy and data protection legislation. If there is any doubt, treat the information as personal data.
2. *What are the risks?* This is the key question. It is vital that all possible risks are identified and the level of risk should dictate how the data is obtained and managed. It's important to note that compliance with the processing requirements is not of itself enough. The paramount consideration must be given to the consequences of the processing to the interests of the end user. The risks will vary. For example, there may be a small risk of an individual being subjected to direct marketing, Or a risk that an individual's faith, ethnicity, ethnicity or sexual orientation is revealed by association and their home address identified by extremists.
3. *How can we process the personal data lawfully?* To fulfil its legal requirements RAB is required to be 'fair' to the person. To be 'fair' to that person, he or she must have given their consent to the processing. Before asking the individual to give consent, RAB must ensure they have informed the person of how and why their data will be stored. This is done using the Data Privacy Notice.

What to provide?

We provide individuals with the following privacy information:

- The name and contact details of our organisation.
- The name and contact details of our representative (if applicable).
- The contact details of the Data Protection Officer (if applicable).
- The purposes of the processing.
- The lawful basis for the processing.
- The legitimate interests for the processing (if applicable).
- The categories of personal data obtained (if the personal data is not obtained from the individual it relates to)
- The recipients or categories of recipients of personal data.
- The retention periods for the personal data.
- The rights available to individuals in respect to the processing.
- Their right to withdraw consent (if applicable).
- The right to lodge a complaint with the supervisory authority.
- The source of the personal data (if the personal data is not obtained from the individual it relates to).

- The details of whether individuals are under a statutory or contractual obligation to provide the personal data, (if applicable, and if the personal data is collected from the individual it relates to).
- The details of the existence of automated decision-making, including profiling (if applicable).

When to provide it?

We provide individuals with privacy information at the time we collect their personal data from them.

If we obtain personal data from sources other than the individual relates to, we provide them with previous information:

- Within a reasonable period of obtaining the personal data and no later than one month.
- If we plan to communicate with individual, at the latest' when the first communication takes place, or
- If we plan to disclose the data to someone else, at the latest. when the data is disclosed.

How to provide it?

We provide the information in writing and in a way that is appropriate to each service, always assuring it is:

- concise,
- transparent,
- intelligible,
- easily accessible, and
- uses clear and plain language changes.

We will read the information to people who cannot access it in writing and provide the statement on our website in a form that can be read by assistive software.

Changes to the information

The information we regularly review and where necessary, update our privacy information.

If we plan to use personal data for a new purpose we update our privacy information and communicate changes to individuals before starting any new processing.

RAB will ensure that the individual is able to understand the information provided and realises any possible consequences. If the personal data is 'sensitive' then the consent must be absolutely explicit, which means informed consent from the Data Subject.

'Sensitive' data reveals the individual's:

- racial or ethnic origin,
- political opinions,
- religious beliefs,
- trade union membership,
- physical/mental health or condition,
- sexual life,
- criminal record,

The storing and managing of personal data.

- The data shall be obtained for specific purposes and will not be used for any other purpose. RAB will only use personal data for the purposes the individual consented to.
- RAB will only request data that is relevant, not excessive, and adequate for its purpose. Data will not be stored on the basis that it may be useful one day.
- RAB will make reasonable effort to ensure that data obtained is accurate and it will provide a method of regular review, in the Data Control Sheet, to keep it up to date if necessary.
- RAB will not keep data for longer than is necessary. A review period will be specified in the data control sheet and any data that is that is no longer necessary will be deleted.
- RAB will rectify, delete, or cease to hold data within a reasonable time of request by the individual.
- RAB will take all measures to prevent unauthorised or unlawful processing of personal data and accidental loss or damage. The measures will be specified in the Data Control Sheet.

Use of personal electronic devices

Any staff member who uses their own device(s) when working must take responsibility for their own device(s) and how they use it. They must:

- Familiarise themselves with their device(s)' security features so they can ensure the safety of RAB's information as well as their personal information.
- Install and use the relevant security features, maintain the device themselves, ensuring it is regularly patched and upgraded.

While RAB will always endeavour to assist wherever possible, we cannot take responsibility for supporting devices we do not provide.

Staff using their own devices must take all reasonable steps to:

- Prevent theft and loss of data.
- Keep information confidential where appropriate.

- Maintain the integrity of data and information, including in the office.
- Take responsibility for any software they download to their devices.

Staff using their own devices must:

- Set up passwords or equivalent, ensuring their efficient length and complexity appropriate for the type of advice.
- Not hold any information that is sensitive, personal, confidential, or of commercial value on personal devices. Instead, they should use the cloud based facilities subscribed to by RAB, such as Microsoft Office 365, CharityLog, Xero, BrightPay etc.
- If it is essential that information belonging to RAB is held on a personal device it should be deleted as soon as possible once no longer required. This includes information contained in emails.
- Be aware of any data protection issues and ensure personal data is handled appropriately.
- Report the loss of any device containing RAB data, including emails, to RAB's CEO.
- Report any security breach immediately to RAB's CEO.
- Ensure that no RAB information is left on any personal device indefinitely. Particular care must be taken if a device is disposed of, sold, or transferred to a third party.

Management of the data control sheets.

RAB will produce a data control sheet for each category of data held.

Data control sheets will not form part of this policy as the responsible manager may need to alter the instructions as circumstances change or produce additional sheets should the storage of additional data be required.

Data breach Procedure

In the event of a data breach the RAB CEO should be notified immediately and at least within 12 hours. The RAB CEO will take immediate action to prevent further loss and mitigate any potential damage caused.

The CEO will notify the Chair of Trustees with the following information in line with ICO guidance:

- Date and nature of the breach
- Whether the ICO should be notified
- Whether any individuals should be notified
- Any action required to prevent reoccurrence

Appendix A

RAB Privacy statement

Our contact details:

Reading Association for the Blind, Walford Hall, Carey Street, Reading RG1 7JS
0118 957 2960 info@rabsightloss.org

The type of personal information we collect

We currently collect and process the following information:

Contact details; information about your sight loss condition and personal circumstances; records of Outreach interventions; activity group waiting lists, membership, and attendance.

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 for one of the following reasons:

Sufficient information to enable us to support you appropriately without you having to repeatedly give us the same information; records of contact in case of concern or complaint; information on our work that can be anonymised and used to report to our funders; tracking and assessing the impact of our interventions.

We also receive personal information indirectly, if you have been referred to us by a third party. We will always check this information with you when we commence support, so we know that it is accurate and you know that we have it.

If we refer you to another organisation we will need to share some of your information with them. We will always seek your explicit consent before doing this. Your consent to this privacy statement does not constitute consent for us to share your information with third parties.

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information is your consent. You are able to remove your consent at any time. You can do this by contacting any member of RAB staff verbally or in writing.

How we store your personal information

Your information is securely stored on password-protected cloud-based software.

We will normally keep your information for three years after our last contact with you. We will then dispose your information by using a database function that removes all identifying details from your files and therefore allows us to keep a record of work undertaken that can be reported to our funders but does not record that the work was undertaken on your behalf or store any of your personal details. If we have terminated support due to safety and safeguarding concerns we may store information on the termination for up to ten years to

enable RAB to make an informed decision on whether or how to support you should you reapply to us for support in the future.

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 using the contact details above if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to the RAB CEO using the contact details above.

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>

Appendix B

Staff administration data control sheet

Responsible manager: Adele Barnett Ward

Data subjects:

- applicants (successful and unsuccessful)
- former applicants (successful and unsuccessful)
- employees (current and former)
- casual staff (current and former)
- volunteers (current and former)

The information held:

Details provided on recruitment, appointments or removals, pay, related to work performance, disciplinary/grievances, superannuation, and any other personnel matter.

The purposes of the information - sufficient information to be able to meet the employer's duties and be a responsible, effective employer.

Potential risks for the data subject

Sensitive information could be revealed. Personal embarrassment. Contact details/addresses could be revealed to inappropriate person.

How to eliminate or minimise those risks

Store data on cloud-based services (Office 365, Charity Log, BrightPay etc) whenever possible. Use passwords to unlock IT equipment and protect access to cloud locations. Limit permissions on Charity Log, password protect documents with sensitive data. Where storage of paper documents cannot be avoided store these in sealed envelopes in a locked office. Delete or destroy information that is no longer needed.

Information to be given prior to consent - That the information will be held for the reasons stated.

How will information be given? Employee terms and conditions.

How will consent be obtained? By signing the employee terms and conditions

How will an individual correct or request removal of their personal data?

Staff (current or former) or applicants - by written request to the RAB CEO.

Volunteers (current or former) - verbally or in writing to the RAB Volunteer coordinator or CEO.

What actions will be taken to ensure the security of the data? The information will be still stored digitally and deleted once it's no longer needed. Information that cannot be stored digitally will be stored in sealed envelopes, in a locked office and destroyed when no longer needed.

For how long will the data be stored?

- Unsuccessful applicants. All data should be destroyed as soon as possible, and certainly within six months, unless permission is requested and given for details to be retained for future vacancies.
- Staff and volunteers. Retained for professional necessity, and not just in case.

Following employment.

- PAYE records three years
- SSP Records three years,
- SMP records, three years.
- Information to inform references / decision to re-employ, five years
- Any information relating to industrial accident 12 years.
- Information relating to pension contributions for at least 10 years.



Appendix C

Service user data control sheet

Responsible manager: Adele Barnett Ward

Data subjects:

- Users of the Outreach Service
- Members of the Association

The information held:

Contact details, information about the service user's sight loss and personal circumstances. Records of Outreach interventions, activity group waiting lists, membership, and attendance.

The purposes of the information - sufficient information to be able to support the service user appropriately without them having to repeatedly give the same information. Records of contact in case of concern or complaint. Information that can be anonymised and used to report to funders. Tracking and assessing impact of interventions.

Potential risks for the data subject - Sensitive information could be revealed. Personal embarrassment. Contact details/addresses could be revealed to inappropriate person.

How to eliminate or minimise those risks - Store data on cloud-based services (Office 365, Charity Log, BrightPay etc) whenever possible. Use passwords to protect unlock IT equipment and protect access to cloud locations. Limit permissions on CL, password protect documents with sensitive data. Avoid using paper. Where paper records are needed for operational efficiency (transport lists, registers etc.) transfer information to cloud storage ASAP and shred paper copy.

Information to be given prior to consent - That the information will be held for the reasons stated.

How will information be given? Statement read to service user at first contact. Paper copy given if accessible. Digital copy on RAB website. Information repeated at the end of a course of outreach intervention, sent with membership renewal reminder and/or when membership is ended. This information includes the right of outreach service users to use the service anonymously and for all outreach service users to request the erasure of personal data at any point.

How will consent be obtained? Verbally.

How will an individual correct or request removal of their personal data? Verbally or in writing to any member of RAB staff.

What actions will be taken to ensure the security of the data? The information will be still stored digitally and deleted once it is no longer needed. Information that has to be on paper is printed only for that purpose and destroyed at the conclusion of the task.

For how long will the data be stored?

- Members of the association - at the termination of a membership members will be offered the option of erasing their personal details immediately or staying on the system for three years to allow for possible future renewal of the membership.
- Lapsed members - will be written to and informed that their personal data will be erased after three years unless they request earlier removal.
- Outreach - at the end of each outreach intervention staff will request that service users choose to either remain on the RAB system or have their personal data erased. Service users who have not had contact with RAB for three years will be contacted and told their personal details will be erased unless they contact RAB asking to be retained on the system.
- Exceptions to the above - If RAB has had to withdraw support from a service user for reasons of safety or safeguarding, their record may be kept for up to 10 years to ensure RAB has appropriate information should the service user reapply for support.

Appendix D

Mailing lists and e-mail data control sheet.

Responsible manager Rebecca Van Der Kemp

The data subjects - Any data subject with whom we have reason to contact whilst pursuing the objectives of RAB

The information held - May include some or all of name, home address, telephone number, e-mail address, emails RAB has sent or received.

The purpose of the information - to inform individuals of activities that may be of interest to them, to circulate information.

Potential risks for the data subject

Content of emails or correspondence may contain sensitive information or personal data. Non-RAB staff may access information.

The data subject may receive unwanted mail.

How to eliminate/minimise those risks?

Only keep hard copies of emails containing personal data if absolutely necessary.

Only store correspondence that may be needed and review as detailed below.

Hide e-mail addresses when mailing to a group

When sending marketing information or E bulletins give the receiver the option to be excluded from future mailings or to update their details and always action this request promptly.

Information to be given prior to consent - the nature of any e-mail received.

How will that information be given? In a registration form or by e-mail

How consent be obtained?

By saying they wish be included on the mailing list (verbally or in writing),

By filling out the form on the website

By not taking the option to opt out that must be included in all mailings.

For how long will the data be stored?

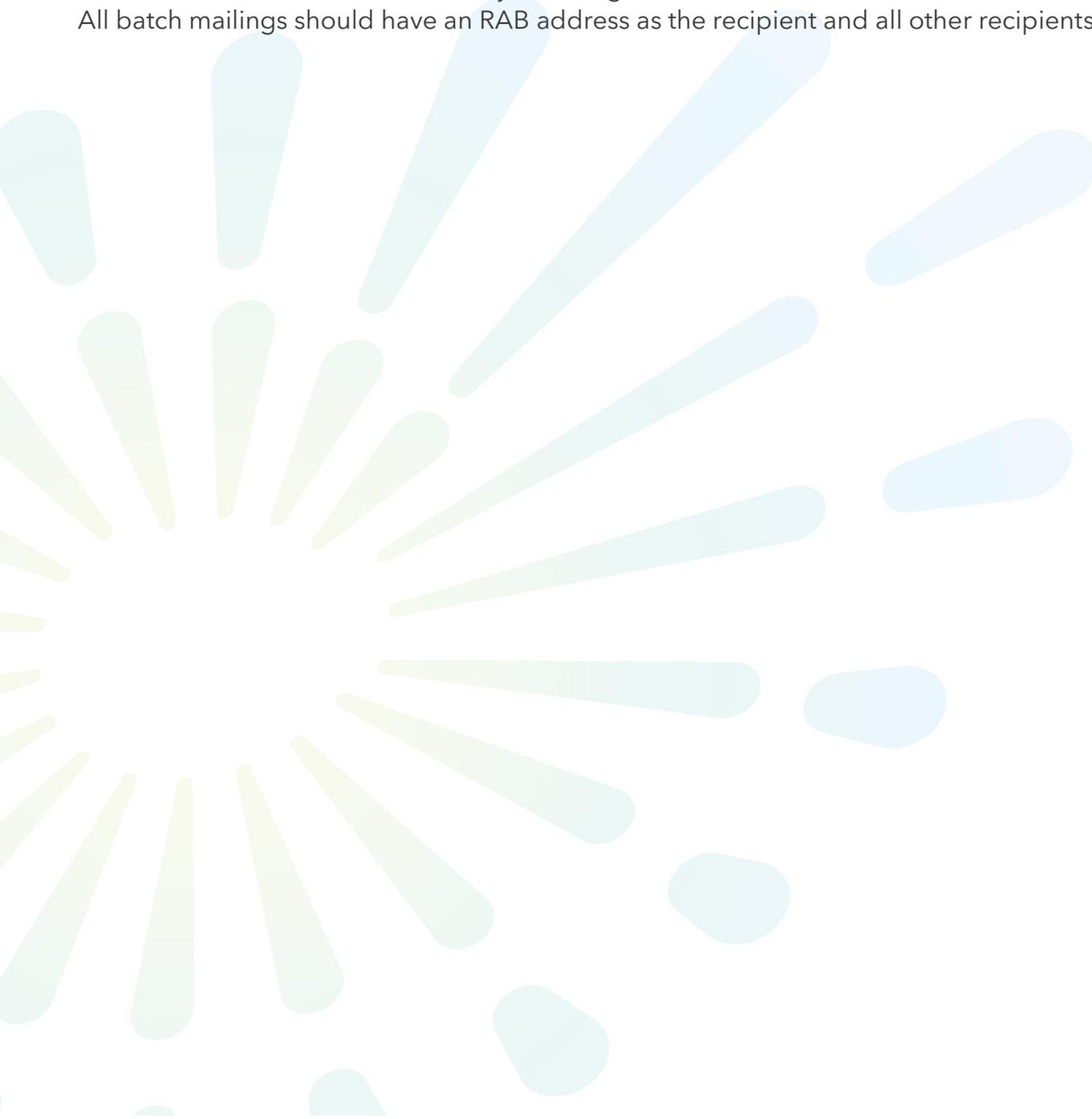
Until it is no longer needed
Until the data subject requests removal
Up to a maximum of five years.

How an individual correct or request removal of their personal data?

By telephone in person by letter, e-mail.

What actions will be taken to ensure the security of data?

The data will be stored electronically, allowing access to our RAB staff and volunteers.
All batch mailings should have an RAB address as the recipient and all other recipients in BCC.



Reading Association for the Blind (RAB) Privacy Notice for service users and other contacts.

Our contact details

RAB, Walford Hall, Carey Street, REading, RG1 7JS

What type of information we have

How we get the information and why we do we have it

If you have been referred to us by a third party they will give us some information about you as part of the referral. They should have asked your permission before doing this. We will check this in

What we do with the information

How we store your information

Your data protection rights

How to complain

'XYZ' Organisation Privacy Notice

Our contact details

Name:

Address:

Phone Number:

E-mail:

What type of information we have

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details)
- Details of your sight loss and other relevant conditions and circumstances.
- Next of kin and emergency contacts.
- Details of your interactions with RAB (primarily activities attendance records and casework carried out)

How we get the information and why we have it

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

- You have provided your contact details and requested to join our mailing list.
- You have contacted us in a professional capacity.
- You have contacted us for outreach support
- You have become a member of the association

We also receive personal information indirectly, when other charitable organisations and statutory bodies make referrals to RAB. When referrals are made we may receive:

- Your name and contact details
- Details of your sight loss and other relevant conditions
- The reason for the referral.

When we receive information about you as part of an external referral we will tell you what information we have been given about you and give you the opportunity to amend it or request deletion.

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information is your consent. You are able to remove your consent at any time. You can do this verbally by contacting any member of RAB staff in person or by calling 0118 957 2960; or in writing by emailing info@rabsightloss.org or writing to us at Walford Hall, Carey Street, Reading RG1 7JS.

What we do with the information we have

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

- Provide you with Outreach support.
- Manage your membership of the association and activity bookings.
- Send you communications about the charity and our services.
- Track the impact of our work.
- Provide anonymised impact and tracking data to our funders

We will not share your information with third parties without your explicit permission.

How we store your information

Your information is securely stored on a password-protected cloud-based CRM (Customer Relationship Management) system. When it is necessary to have paper copies of your data (for example, for an activity register or transport list) we only print essential and relevant information, and the paper copy is shredded or otherwise securely disposed of once it is no longer needed.

How long we keep your information for

We will keep your information for three years after our last contact with you. You can request removal of your data (this is done by anonymising your record on our CRM) at any time.

In the event of RAB withdrawing support from you for reasons of safety or safeguarding, a record of the reason for withdrawal of support may be kept for up to 10 years to ensure RAB has appropriate information should you reapply for support.

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 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 information in certain circumstances.

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

Your right to data portability - You have the right to ask that we transfer the 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 at info@rabsightloss.org, 0118 957 2960 or Walford Hall, Carey Street, Reading RG1 7JS if you wish to make a request.

How to complain

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