

PRIVACY POLICY

Date of Policy	March 2022
Date Policy due for review	March 2024
Policy Owner	Data Protection Officer (Operations Manager)

We want everyone who supports us, who comes to us for support or applies to work or volunteer with us to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

Respond's Privacy Policy may change so please remember to check back from time to time. Where we have made any changes to this Privacy Policy, we will make this clear on our website.

We are committed to treating you with respect and openness.

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1. Who we are

Respond is 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 the EU General Data Protection Regulation 2016/679 (hereinafter '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 Data Protection Officer by:

- Writing to Respond, Lenta Space, 180-186 King's Cross Rd, London WC1X 9DE
- Calling us on 020 7383 0700
- Emailing to admin@respond.org.uk

2. How we collect information about you

Respond reduces the impact of trauma in the lives of people with learning disabilities and autistic people, by developing trusting healthy relationships, through providing psychotherapeutically informed services.

We want to ensure 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 access support, book on an event or donate to us. We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our services, register with us for training or an event, donate, ask a question, 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 shop, or get in touch through the post, or in person.

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. 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.

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 a purchase or donation), as well as information you provide in any communications between us. You will have given us this information whilst donating,

registering for an event, placing an order on our website or any of the other ways to interact with us.

We will mainly use this information:

If you engage with our services or need us to support you in any way we use your personal information to:

- Provide you with care and support through our services
- Contact or provide your nominated carer, emergency contact, relative or next of kin with relevant information or support
- Comply with our legal obligations such as our safeguarding duty where we have concern for your welfare or the welfare of others
- 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 even or services or goods you have requested
- To 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
- 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 an 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 Respond
- To invite you to participate in surveys or research

Special Category Data

Data Protection Law recognises that some categories of personal information are more sensitive. What was known as sensitive personal data is now called special category data and can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- 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.

- 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 blog or in other media

4. Profiling: making our work more unique to you

We want to improve how we talk to you and the information we provide through our website, services, products and information. To do this we sometimes use external providers to support us in 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.

5. 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 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 Respond to process your information to help us to achieve our mission; Respond reduces the impact of trauma in the lives of people with learning disabilities and autistic people, by developing trusting healthy relationships, through providing psychotherapeutically informed services.

Whenever we process your personal data 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.

Some examples of where we have a legitimate interest to process your personal data 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.

There are two areas where we have a public interest to tell people outside of Respond something you have told us are:

- If you tell us something that means we think you could be harmed (such as telling us someone hurts you, or that you are hurting yourself)
- If you tell us something that means someone else might get hurt.

On these occasions we have a legal duty to inform our safeguarding lead who will decide whether to tell social services or the police. If this did happen – we would always tell you before we passed on the information.

6. Marketing

We will only contact you about our work and how you can support Respond by phone, email or text message, 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 Respond 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 admin@respond.org.uk

7. Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers) at Respond 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.

Respond 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. An example of where we may share your information is with our partners who help us to process donations and claim Gift Aid.

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.

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'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.

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.

9. How long we hold your information for

We only keep your information 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).

10. Your rights

You have various rights in respect of the personal information 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 our Data Protection Officer via our Administration team:

In writing: Data Protection Officer, Respond, Lenta Space, 180/186 King's Cross Road, WC1X 9DE

By email: admin@respond.org.uk

By phone: 020 7383 0700.

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

Access to your personal information: 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 and complete a subject access request form (SAR). 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 situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. 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: Automated decision-making takes place when an electronic system uses personal information to make decisions without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

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.

To find out more about this policy and how we look after your personal information, contact our Data Protection Officer via our Administration team at admin@respond.org.uk or on 020 7383 0700.

. SUBJECT ACCESS REQUEST FORM

The General Data Protection Regulations (GDPR) provides you, the data subject, with a right to receive a copy of the data/information we hold about you or to authorise someone to act on your behalf. Please complete this form if you wish to see your data and/or if you wish to see your data and request for the right to be forgotten. You will also need to provide **proof of your identity**. Your request will be processed within one month upon receipt of a fully completed form and proof of identity.

Proof of identity:

We require proof of your identity before we can disclose personal data. Proof of your identity should include a copy of two documents such as your birth certificate, passport, driving licence, official letter addressed to you at your current address e.g. bank statement, recent utilities bill or council tax bill. The documents should include your name, date of birth and current address. If you have changed your name, please supply relevant documents evidencing the change.

Administration fee:

Respond's policy is not to charge for Subject Access Requests.

Section 1

Please fill in your details (the data subject). If you are not the data subject and you are applying on behalf of someone else, please fill in the details of the data subject below and not your own.

Title:		
Surname/Family Name:		
First Names/Forenames:		
Date of Birth		
Address:		
Post Code:		
Email Address:		
Previous Address:		
Post Code:		
Telephone Numbers:		

I am enclosing the following copies of proof of Identity:

Birth certificate Driving Licence Passport An official letter with my address

If none of these are available please contact Respond's Data Protection Officer for advice. Respond's Data Protection Officer is the Operations Manager

Personal Information:

If you only want to know what information is held in specific records please indicate below:

Please tell us if you know in which capacity the information is being held, together with any names or dates you may have. If you do not know the current name of the dept or team just tell us what you do know. If you do not know exact dates, please give the year(s) that you think may be relevant.

Details

Employment records

If you are or have been employed by Respond and are seeking personal information in relation to your employment please provide details of your dates of employment

Right to be forgotten

If you are requesting for your information to be deleted from our system please indicate here

Section 2 - Please complete this section of the form with your details if you are acting on behalf of someone else. (i.e. the data subject).

If you are **NOT** the data subject, but an agent appointed on their behalf, you will need to provide evidence of your identity as well as that of the data subject and proof of your right to act on their behalf.

Title:
Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Miss <input type="checkbox"/> Other <input type="checkbox"/>
Surname/Family name:
Firstnames/Forenames:
Date of Birth:
Address Including Postcode:
Email Address:
Telephone Number (s):

Please provide proof of Identity as detailed on section 1

I am enclosing the following copies as proof of identity:			
Birth Certificate	Driving Licence	Passport	Official letter to my Address
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If none of these are available please contact Respond's Data Protection Officer for advice. Respond's Data Protection Officer is the Operations Manager			

What is your relationship to the data subject? (eg. Parent, carer, legal representative)			
I am enclosing the following copy as proof of legal authorisation to act on behalf of the date subject:			
Letter of authority	<input type="checkbox"/>	Lasting or Enduring Power of Attorney	<input type="checkbox"/>

Evidence of parental responsibility **Other**

Data Declaration

I certify that the information provided on this form is correct to the best of my knowledge and that I am the person to whom it relates. I understand that Respond is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.

Name:

Signature:

Date:

OR

Authorised Person – Declaration (if applicable)

I confirm that I am legally authorised to act on behalf of the data subject. I understand that Respond is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request

Name:

Signature:

Date:

Warning: A person who unlawfully obtains or attempts to obtain data is guilty of a criminal offence and is liable to prosecution

I wish to:

Receive the information in electronic format (some files may be too large to transmit electronically and we may have to supply in another format)

Receive the information by post*	<input type="checkbox"/>
Collect the information in person	<input type="checkbox"/>
View a copy of the information only	<input type="checkbox"/>
Go through the information with a member of staff	<input type="checkbox"/>
<ul style="list-style-type: none">• Please be aware that if you wish us to post the information to you, we will take every care to ensure that it is addressed correctly. However, we cannot be held liable if the information is lost in the post or incorrectly delivered or opened by someone else in your household. Loss or incorrect delivery may cause you embarrassment or harm if the information is 'sensitive'	

Please send your completed form and proof of identity to:

Respond
Data Protection Lead
Lenta Business Centre
180/186 Kings Cross Road
London WC1X 9DE

Or via admin@respond.org.uk

Respond will retain the information provided and only share the information with those it is legally entitled to. The information will only be kept for as long as necessary and in accordance with Respond's retention policy, will be disposed of in a safe and secure manner.