



## Privacy Policy

### Introduction

On 25 May 2018, the General Data Protection Regulation (GDPR) will be enforced across Europe, including the UK. The law aims to give citizens more control over their data and to create one set of rules that will be enforced across Europe. GDPR covers both written information and information stored and created on computers. The law clearly sets out how and where personal data is kept by organisations and includes staff, volunteers, beneficiaries, suppliers and supporters.

Soundabout has a duty to work within the new regulations as it "collects, stores and processes" data about individuals when undertaking its operations. The Trustees will endeavour to ensure data is managed within the requirements and will minimise access etc. to any personal data to a minimum, by Trustees/Volunteers, within its work. The following policy is not a definitive statement on the GDPR, but seeks to interpret relevant regulations and guidance where they affect Soundabout.

The CEO has overall responsibility for data protection within Soundabout and is the nominated Data Controller. Each Soundabout representative who processes personal information and data is a Data Processor acting on the Data Controller's behalf and also has a legal obligation to adhere to the Regulations.

### Policy Statement

Soundabout is committed to meeting its obligations and ensuring compliance with the Data Protection Act of 1998 and the General Data Protection Regulation (GDPR) when it comes into force on 25 May 2018. Soundabout will:

- respect the rights of each individual
- be open and transparent about the personal data it holds
- strive to observe the law in all collection and processing of subject data
- meet any subject access request in compliance with the law

- provide training and support to Soundabout representatives who handle personal data in the course of their duties
- maintain an up-to-date Information Commissioner's Office (ICO) registration (which requires changes to the registration within 28 days of any adjustments)
- inform the ICO of breaches of the Acts (where required)
- include Data Protection guidance for all trustees and employees

Soundabout will only use data in ways relevant to carrying out its legitimate purposes and functions as a charity in a way that is not prejudicial to the interests of individuals. Soundabout will take due care in the collection and storage of any sensitive data. Soundabout representatives will do their utmost to keep all data accurate, timely and secure.

Soundabout's nominated Data Controller is the CEO. All Soundabout representatives will be aware of the requirements of the Data Protection Act when they collect or handle data about an individual. Soundabout representatives will not disclose data except where there is subject consent or legal requirement. Data sent to outside agencies will always be protected by a written contract. All collection and processing will be done in good faith. Paper records will be destroyed when no longer required.

## **Collection of information**

Soundabout may collect information about individuals whenever they interact with the charity, for example when individuals:

- Register (on behalf of children, young people and vulnerable adults) to participate in Soundabout activities/sessions
- apply to volunteer or work as a Soundabout practitioner
- enquire about our activities, visit our website or donate to the charity
- sign up to receive our newsletter
- attend a Soundabout event and provide us with information about you
- fundraise on our behalf
- post content to Soundabout's social media
- contact us by email, online contact form, phone, SMS, social media or post

Soundabout may collect information in the following ways:

- when individuals provide information directly in booking places for Soundabout sessions
- when individuals provide information directly as a volunteer or Soundabout practitioner

- when individuals provide information directly, for example by providing details when they request information or make a donation
- when individuals provide information indirectly, for example when using other fundraising sites and provide consent to be contacted by Soundabout
- when individuals connect with Soundabout on social media and messaging services
- when individuals use Soundabout websites and information about the visit is recorded and stored (e.g. Google Analytics for website statistics tracking)
- when information about individuals is available from other public sources, Soundabout may collect personal details from the public domain, such as from company websites and news sites, to provide background information about an individual for Soundabout representatives in preparation for a meeting/event. This information will only be used for this purpose and not stored after the meeting/event unless consent has been provided by the individual.

Each information collection system will make individuals aware of this policy and include a statement to ensure they are aware of their right to ask not to be contacted for marketing and fundraising purposes.

### Personal information - Justification of collection

Stakeholder Group	Requirement for data/information (Legitimate Interests)	Consent Required
Beneficiaries – children, young people and vulnerable adults with disabilities, and their siblings	<ul style="list-style-type: none"> <li>• management of Soundabout activities/projects</li> <li>• impact measurement</li> <li>• anonymised data may be used to inform Soundabout planning and provision of activities/projects</li> </ul>	<ul style="list-style-type: none"> <li>• use as case studies</li> <li>• use of images/recordings (aged 13+ and has the capacity to consent)</li> </ul>
Parents/guardians of beneficiaries	<ul style="list-style-type: none"> <li>• management of Soundabout activities/projects</li> <li>• impact measurement</li> </ul>	<ul style="list-style-type: none"> <li>• engagement in case studies</li> <li>• parental/guardian consent for use of images/recordings of their children</li> <li>• marketing</li> <li>• fundraising</li> </ul>
Previous beneficiaries – children, young people and vulnerable adults	<ul style="list-style-type: none"> <li>• impact measurement</li> </ul>	<ul style="list-style-type: none"> <li>• use as case studies</li> <li>• use of images/recordings (aged 13+ and has the capacity to consent)</li> </ul>

	<ul style="list-style-type: none"> <li>• anonymised data may be used to inform Soundabout planning and provision of activities/projects</li> </ul>	
Parents/guardians of previous beneficiaries	<ul style="list-style-type: none"> <li>• impact measurement</li> </ul>	<ul style="list-style-type: none"> <li>• parental/guardian consent for use of their children's images</li> <li>• marketing</li> <li>• fundraising</li> </ul>
Teachers/Practitioners who take part in training/activities	<ul style="list-style-type: none"> <li>• management of Soundabout activities/projects</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>
Soundabout Trustees	<ul style="list-style-type: none"> <li>• management and governance of the charity</li> </ul>	<ul style="list-style-type: none"> <li>• use of images</li> <li>• marketing</li> <li>• fundraising</li> </ul>
Volunteers	<ul style="list-style-type: none"> <li>• volunteer management</li> </ul>	<ul style="list-style-type: none"> <li>• use of images</li> <li>• marketing</li> <li>• fundraising</li> </ul>
Contractors	<ul style="list-style-type: none"> <li>• contract management</li> </ul>	<ul style="list-style-type: none"> <li>• use of images</li> <li>• marketing</li> <li>• fundraising</li> </ul>
Individual supporters	<ul style="list-style-type: none"> <li>• receipt and acknowledgement of donation</li> <li>• management of Gift Aid</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>
Lapsed supporters (last donated three+ years ago)	<ul style="list-style-type: none"> <li>• management of Gift Aid (declarations should be kept for six years after the accounting year end that includes the last donation to which they relate)</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>
Individual donor through third party fundraising website	<ul style="list-style-type: none"> <li>• receipt and acknowledgement of donation</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>
Corporate and philanthropic supporters	<ul style="list-style-type: none"> <li>• acknowledgement of support</li> <li>• relationship management</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>

Organisational supporters	<ul style="list-style-type: none"> <li>• acknowledgement of support</li> <li>• relationship management</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>
Individuals who signed up for the newsletter on the website	<ul style="list-style-type: none"> <li>• newsletter subscription</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>
Individuals who follow Soundabout on social media	<ul style="list-style-type: none"> <li>• social media contact</li> </ul>	<ul style="list-style-type: none"> <li>• marketing via other channels</li> <li>• fundraising via other channels</li> </ul>
Individual/organisation who sent an enquiry	<ul style="list-style-type: none"> <li>• response to the enquiry</li> </ul>	
Suppliers	<ul style="list-style-type: none"> <li>• management of the charity</li> </ul>	<ul style="list-style-type: none"> <li>• marketing</li> <li>• fundraising</li> </ul>

In the instances outlined in the above justification of collection, Soundabout will only process personal information without consent when we are legally allowed to do so. This will only be where it is in the charity's legitimate interests to do so and where we are confident that such processing is not likely to prejudice individuals' legitimate interests or rights and freedoms.

In all other instances, Soundabout will process personal information on the basis of consent that has been given by individuals, who are entitled to withdraw that consent at any time such that we can no longer rely on it as a basis for continuing to process their personal information.

### Consent Statements for each 'data collection point'


## Use of information

Soundabout will use personal information in a range of ways, which include:

- to provide individuals with the support or information they have requested
- to provide inclusive Soundabout activities and sessions
- to update individuals about any changes to Soundabout services
- to administer donations, including Gift Aid processing
- to support individuals' fundraising activities
- to maintain organisational records and ensure we have up-to-date marketing and communication preferences for individuals
- to send newsletters or other information about Soundabout's work
- to invite individuals to participate in fundraising activities and attend events
- to invite individuals to make donations to support Soundabout's work
- to invite individuals to participate in surveys or research
- to analyse and improve the operation of our websites
- to analyse individuals' use of our websites

Soundabout requires sensitive personal data (as defined by the Data Protection Act 1998) to plan Soundabout sessions and activities. We will process any sensitive personal data only in relation to participation in Soundabout services and destroy when no longer needed.

## Images and recordings

Soundabout uses images, video and audio recordings on its websites and within publications, and has a detailed photography, video and audio recording policy that covers this practice. We do not permit photographs, other images, video or audio recordings of children, young people and vulnerable adults to be taken without the consent of the parents/guardians and the young person if aged 13 years or older and has the capacity to consent. This consent is valid whilst the child is a beneficiary of Soundabout and for up to two years afterwards.

All images, video and audio recordings will be stored securely, and identified only through a child's first name and first letter of their surname (so they cannot be traced). If images, video or audio recordings are selected to be used in high-profile contexts (such as YouTube videos and television programmes), we always ask further permission of parents/guardians and children. We take all steps to ensure these images are used solely for the purposes they are intended.

## **Security of information**

Soundabout places significant importance on the security of individuals' personal information and we will always try to take appropriate precautions to protect it by:

- ensuring that there are appropriate technical controls in place to protect personal details on our websites and internal systems
- ensuring that only authorised personnel (i.e. selected Soundabout staff, volunteers or contractors) have access to your information, and that they are appropriately trained to manage personal information.
- ensuring that donations and payments are processed securely
- Keeping written documents with personal data in a locked filing cabinet

Should Soundabout suffer a data loss or breach, the individual identifying the breach will pass all relevant information to the nominated Data Controller (CEO) who will record the incident information and assess if the loss/breach is significant enough to be reportable to the ICO. GDPR requires that data losses/breaches are reported within 72 hours by the Data Controller and this will be strictly complied to by Soundabout.

## **Sharing of information**

Before using any external organisations to collect and/or process personal data on our behalf, Soundabout will perform rigorous checks to ensure they meet all relevant regulations and legislation. The contract will impose robust data protection requirements, including the provisions of this policy, and seek to provide maximum protection of individuals' personal information.

Soundabout may legally be required to disclose personal information if required to do so by law. Such circumstances might include safeguarding, prevention and detection of crime, terrorism and legal proceedings. We will only ever share personal information in other circumstances if we have consent to do so. Such consent will be recorded and include the information to be shared and with whom. We will never sell personal information to third parties.

## **How long will Soundabout store information?**

Soundabout will hold individuals' personal information on our systems for as long as is necessary for the relevant activity.

Soundabout has set a limit of three years for holding data valid since last proactive contact confirming consent by the individual. After three years, the information will be either renewed by an individual or archived (unless it includes details of a Gift Aid donation, which will be kept for six years after the accounting year end that includes the last donation to which they relate).

Soundabout will maintain a list of signed photographic consents where individuals are identifiable, and the images are used for publicity or promotional purposes. Images captured for historical records will be exempt.

If an individual asks Soundabout to stop sending marketing and/or fundraising materials, we will keep a record of the individual's contact details and appropriate information to enable us to comply with the request not to be contacted.

## **Individuals' Rights**

The GDPR provides the following rights for individuals over their personal information and how we use it:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

If an individual would like to exercise any of these rights, they should contact the nominated Data Controller (CEO) in writing at Soundabout, Cornerstone, 25 Station Road, Didcot, Oxfordshire, OX11 7NE, by calling 01235 797474 or by emailing [info@soundabout.org.uk](mailto:info@soundabout.org.uk)

Any visitors to Soundabout websites who do not want their data used by Google Analytics can install the Google Analytics opt-out browser add-on.

*Cookie Policy needed as cookies are used on the website.*

A data subject (individual) or approved agent may make a request to have a copy of all information held on them by an organisation. On receipt of a Subject Access Request, it will be passed immediately to the nominated Data Controller (CEO). The Data Controller will then check the validity of the subject access request for authenticity and, once authenticated, will gather a response which will be sent to the subject.



