



MRS Independent Living

Policy and guidance topic	Privacy
Last updated	September 2019
Due for review	September 2020

Purpose

The purpose of this policy is to outline how MRS Independent Living (MRS) respects privacy when dealing with personal information collected by our organisation.

This privacy policy applies to information that we collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this privacy policy, please contact MRS at services@mrsindependentliving.org.

Communicating this policy

This privacy policy will be available for individuals to download from our website.

- Individuals whose personal data we obtain directly from them will be provided with a link to the privacy information at the time.
- Individuals whose personal data we obtain indirectly (i.e. because they have been referred by a health professional) will receive privacy information upon their first contact with the service (no later than one month).

Personal data that we process as a data controller

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements and source)	Lawful basis
Enquiring about our organisation and its work	Name, contact details, message Source: data subject	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.

<p>Enquiring about volunteering</p>	<p>Name, contact details, next of kin details, date of birth, ethnicity, accessibility needs, DBS check status, referee names and contact details, and availability</p> <p>Source: data subject</p>	<p>Legitimate interests - it is necessary for us to collect and store information about you in order to be able to provide appropriate support and ensure necessary checks can be carried out.</p> <p>It is necessary for us to collect special category data on ethnicity and disability for our own internal diversity monitoring.</p>
<p>Referrals to our services and management of ongoing cases (for contracted services commissioned by public bodies, i.e. Staying Steady)</p>	<p>Name, contact details, date of birth, ethnicity, religion, health information, next of kin details, ongoing case notes</p> <p>Source: data subject or referrer</p>	<p>Public interest - it is necessary for us to read and store information about you, your health status and certain protected characteristics in order to identify and deliver an appropriate service for you and to fulfil our obligations to provide contracted services.</p> <p>In some cases it may be necessary for us to share your personal data with the commissioner of the service to enable them to fulfil obligations relating to value for money and prevention of fraud.</p> <p>It is necessary for us to collect some special category data on ethnicity, religion and health status for the provision of health and social care as commissioned by the relevant public body.</p>
<p>Referrals to our services and management of ongoing cases (for services <u>not</u> commissioned by public bodies, i.e. Making Room, Side by Side)</p>	<p>Name, contact details, date of birth, ethnicity, religion, health information, next of kin details, ongoing case notes</p> <p>Source: data subject or referrer</p>	<p>Legitimate interests - it is necessary for us to read and store information about you, your health status and certain protected characteristics in order to identify and deliver an appropriate service for you.</p> <p>It is necessary for us to collect special category data on ethnicity,</p>

		religion and health status for the provision of health and social care.
Referrals to other services and organisations	Name, contact details, potentially some health information depending on type of service	Consent - if you have requested us to make a referral to another service or organisation <u>on your behalf</u> , then it is necessary for us to share some personal data in order to make the referral for you. We will ask for your explicit consent to share this data.
Service feedback or evaluation forms	Name, contact details, responses Source: data subject	Legitimate interests - it is necessary for us to read and store your evaluation form in order to develop our services and contact you regarding any concerns you have raised that require follow-up.
Website functionality	Website activity collected through cookies Source: data subject	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver web functionality that you would expect.

How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected. For example, we may use your personal information to:

- reply to enquiries you send to us;
- Identify whether a service that has been requested is appropriate for you;
- handle donations or other transactions that you initiate;
- send you news and promotional information by email, post or text message relating to other MRS services which we think may be relevant for existing service users.

We will not send you fundraising or campaigning information unless we have your explicit consent to do this, and you will always be able to opt-out.

When we share your data

We will only pass your data to third parties in the following circumstances. Data processing in these circumstances is a requirement of either MRS or our commissioners (depending on if the service is commissioned by a public body), and is therefore carried

out under either the legitimate interest or public task lawful bases.

The circumstances are:

- where a service you have been referred to is provided by a contractor working on behalf of MRS (for example, an exercise class instructor).
- where you have asked us to make a referral to another service on your behalf.
- where we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- where we are required by law to share your data.

Sharing data outside of the EU

- We use cloud-based software such as Trello and Google Drive which are developed by companies based in the US to manage our services and process our data. These companies are covered by the EU-US privacy shield which ensures compliance with EU GDPR regulations.
- We only pass data to other third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

How long we keep your data

We take the principles of data minimisation and removal seriously and have retention and archiving/deletion policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose. We delete that data promptly once it is no longer required.

Sometimes data retention policies are set externally by commissioning organisations. For example, for services commissioned by local authorities, we have to retain data for six years following our interaction with you.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years if the activity is ongoing.

Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this.
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you

feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>.

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as you require.

Marketing information about other MRS services

As a charitable organisation, we have a legitimate interest in ensuring our service users are informed about other MRS services and projects they may be eligible for and interested in. If you are using, or have previously used MRS services, we may occasionally contact you with information about such services by post, email, phone or text message. We will ask how you prefer to receive this information. If you have not previously used MRS services, we will not contact you with marketing information without your explicit consent.

We will not send you fundraising or campaigning communications without your explicit consent and you have the right to opt-out at any time. Please email services@mrsindependentliving.org to tell us you no longer want to hear from us.

Website usage tracking

A cookie is a small file of letters and numbers that is downloaded onto your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

Modifications to this policy

We may modify this privacy policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

Contact details

MRS Independent Living
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