



FEBRUARY 2020

THE HARMONY THERAPY TRUST

DATA PROTECTION POLICY & GDPR 2018

NAMED DATA PROTECTION PERSONNEL AT THE HARMONY THERAPY TRUST

DATA CONTROLLER -

ROBERT NELSON CHAIR OF TRUSTEES

AUTHORISED DATA INPUT MANAGERS -

DAWN COCKBURN -PRESIDENT AND OFFICE SUPERVISOR

JULIA MCDUGALL - OFFICE VOLUNTEER (DATA INPUT FOR CLOSED FILES)

CHRISSEY VIGGERS - OFFICE VOLUNTEER

SHARON ROWLEY - OFFICE VOLUNTEER

GILLIE MARSHALL-HOWELLS - OFFICE VOLUNTEER (FINANCES)

JEAN MACKENZIE - OFFICE VOLUNTEER

LYN BASELEY (E NEWSLETTERS) - OFFICE VOLUNTEER

KEZYLYNLOUISE MOTHERSOLE - OFFICE VOLUNTEER

1. WHY WE NEED TO STORE PERSONAL DATA

For our vital service to function efficiently we need to store certain personal information on individuals and organisations to and from whom our and their services are provided

A. WHOSE DATA DO WE STORE

- i. Our beneficiaries (that is the seriously ill, medically referred to us)
- ii. The referrers (NHS, Private Hospitals and hospice healthcare providers plus other organisations like Macmillan, Marie Curie, Crossroads etc) and the individuals within those services
- iii. The therapists registered with us whose services we engage and pay for
- iv. Donors and supporters which may be individuals or organisations
- v. Volunteers
- vi. Trustees
- vii. Service and freelance work Contractors
- viii. Suppliers of services (accountancy services, telephone, web and Internet providers, premises rental, suppliers of goods etc., essential to the natural function of any business or charity) and any person at those suppliers who is point of contact for business
- ix. Email addresses of recipients of our monthly newsletter
- x. Grant makers and fund providers

2. WHAT DATA DO WE STORE

GENERALLY

Name, address and postcode; email address and mobile and/or telephone number, organisation or business address and contact point. We will use this basic information for communication purposes, to advise of our work, our events and any fundraising or other information we wish to provide for the sustainability of our organisation.

SPECIFICALLY

Beneficiaries – all information as above but including limited medical information required as set out on our Referral Form supplied by medical referrer at beneficiaries request (please see or download this form available on this website).

Reason – Medical information is required for appropriate therapy to be offered, adapted or avoided and any contra-indicated conditions the allocated therapist needs to be aware of

Therapists – all information as above but including invoices sent to us for payment, insurance details, certificate of qualifications, associations belonged to, DBS check information, CPD updates

Reason – Ensuring therapists have been interviewed and vetted as properly qualified including up to date skills and appropriate insurance with membership of appropriate governing bodies. Details of therapies provided and checked against invoices etc. This data base is continually updated with reminders to therapists to send us their annual insurance details and any fresh qualifications

Referrers – All information as above, and in the case of individuals from those hospitals, hospices or organisations, details of their medical qualification or other authority qualifying them to make such referral

Reason – To ensure that we have medical permission to deliver our services to our beneficiaries and that such referrers are qualified in their field of medical/social expertise to make such referral.

Donors and Supporters - Only general information as referred to above

Reason - To communicate either electronically or by written word news of our events, progress of our work, calls to help and/or volunteer.

Volunteers – General information as above but also skills, availability and DBS check where appropriate

Reason - communication, training, availability, skills update with type of volunteer support provided

Trustees – General as above, but also qualifications and skills

Reason – To register and comply with Charity Commission and Data protection and other legal compliance. Annotation of personal and professional skills, communication and all other legislation connected with Trusteeship.

Service providers and Freelance Contractors – General as above but also skills, qualifications and financial services; details for payment of invoices rendered. DBS checks where applicable

Reason – Recording of services contracted on an ad hoc, retainer, one off or freelance basis; suitability of service provided; payment of invoices rendered; evaluate insurance and accountancy services and analysis of services required; to enable good practice

Suppliers of services and goods – General data as above only and the individual contact point

Reason – To build a platform of reliable providers for goods and services to Harmony to enable good practice

Recipients of newsletter -email address only

Reason -To keep interested parties informed of our monthly news and progress, call out for help or funding, information of events etc

Grant Makers and Fund Providers – general information as defined above and individual point of contact

Reason – To make application for funding grants, inform funders of progress of application of funds provided, to give anonymous data (shown in graph, pie-chart or other format) proof of need as geographical, type of illness, deprivation areas, endorsement and feedback

3. OUR LEGAL OBLIGATION

- A. To ensure all personal data we hold is stored in a safe secure and locked environment and where data is stored electronically that it is processed safely by the named personnel nominated above on a suitable database management system that is encrypted and accessed by login and password only
- B. To notify any possible breach of any of our data storage whether physical or electronic to the Data Controller and for the Data Controller to take action and demonstrate that any breaches have been dealt with satisfactorily
- C. Upon request to delete all forms of data on any one individual to respond in a timely and correct manner to delete such information and to confirm to the requested in writing that this has been done
- D. On retirement of any personnel used by or in any way connected with The Harmony Therapy Trust(including Trustees and Volunteers) , or de-registration of any therapist, service provider or otherwise to immediately remove them from the data base and to notify them in writing that this has been done
- E. On retirement of any Trustee or volunteer so named above who has authorised data input access to delete them from login and password access to the data base and to notify them this has been done

4. YOUR LEGAL RIGHTS

- A. All persons have the right at any time in writing whether electronically, by written paper communication, telephone call or personal representation to request to see a full copy of the data held by us and to request correction of any areas of misinformation, or to deletion of the entire information held

IN ADDITION

- B. The Beneficiaries of our services (whilst appreciating that certain data must be held whilst their treatments continue) have the right to withdraw from the services we supply at any time, to decline the services we offer and request that all information held on them is deleted
- C. The family of a deceased beneficiary (where we have not been notified previously to this effect) to contact us to confirm the beneficiary has died and on such notification to require that all data is removed forthwith
- D. Should any supplier of business or services go into insolvency or liquidation, the official receiver or appointed liquidator shall upon written formal and legal request have the right to see data held on that particular organisation and request deletion of the same.

PLEASE NOTE ANY REQUEST FOR DELETION OF DATA MUST BE MADE IN WRITING OR COMMUNICATED ELECTRONICALLY. IF NO SUCH REQUEST IS MADE WE WILL CONSIDER THAT WE RETAIN THE LAWFUL RIGHT TO HOLD SUCH INFORMATION.

WE WILL NEVER SHARE ANY DATA WITH THIRD PARTIES NOR SELL NOR PROVIDE LISTS OF DATA OR ANY COLLECTED INFORMATION. ALL INFORMATION WE DO HOLD IS ONLY HELD TO FURTHER THE AIMS AND MISSION OF THE HARMONY THERAPY TRUST

Review dated.....March 2020.....Robert Nelson.....

Next Review date.....March 2021.....