



## Tavistock Memory Café - Privacy and Confidentiality Policy

### 1. Introduction

Tavistock Memory Café (TMC) is committed to protecting your privacy and confidentiality. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

The General Data Protection Regulation (GDPR) and Data Protection Act 2018 introduced rules which govern how we manage and store your personal data.

We rely on you giving us consent about how we contact you. This means you will have a choice whether you want to receive communications from us and be able to select how you want to receive them (email, phone, or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, please contact Tavistock Memory Café: Email: [info@tavistockmemorycafe.co.uk](mailto:info@tavistockmemorycafe.co.uk) Post: Tavistock Memory Café, 28 Plymouth Road Tavistock, PL19 8BU, or Tel: 07436 008281.

We will never sell your personal data and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed. We do not use third party fund-raising organisations.

Questions or need to contact us?

Any questions you have in relation to this policy or how we use your personal data should be sent to our Data Controller, Heather Rayne, Contact details above.

#### 1.1 Our Principles of Confidentiality

- a) The Tavistock Memory Café (TMC) recognises that the right to privacy is essential to ensure that members, volunteers and staff are able to have trust and confidence in the organisation.
- b) TMC will make every effort to ensure and maintain an environment where personal rights, choices and dignity are respected.
- c) The TMC is therefore committed to the principle that anyone involved has the right to expect that any information provided by them be used solely for the purpose for which it was given. Information will not be divulged to any other person or organisation without their consent, other than in those circumstances identified in this policy when this principle cannot be adhered to.
- d) This policy applies to anyone, whether an individual or organisation, that uses any service provided by TMC either directly or indirectly.

- e) TMC also recognises its duty of confidentiality to all its Trustees, Volunteers, Members, and Employees.
- f) The success of every volunteer/member relationship depends on maintaining confidentiality. If a member feels they cannot trust you with information, they will not be open and honest with you.
- g) We would speak to you first about sharing, but if there was an occasion where you or someone else might come to harm or the safety of a child/young person or vulnerable adult is affected because we *didn't* share some information, then we would be obliged to do so (see Safeguarding Policy).

\* in the course of discussion, if we feel that information is likely to be revealed that could make continued confidentiality impossible, we will immediately inform you of the implications of continuing to reveal such information.

\* where information is to be revealed to any individual or organisation, the exact nature of such information and to whom it is to be revealed must be discussed with you.

- h) Everyone who works with or for the Tavistock Memory Café and any associated services, understands the need for confidentiality and are bound by agreement to keep to our guidelines.
- i) The principles of confidentiality also extend to all relevant information regarding the internal affairs of the TMC. This duty of confidentiality applies to Trustees, Volunteers and Employees.

The Principles of Information Gathering and Sharing that we follow are:

- i. Information must not be collected or used unless there is a specific and valid reason for doing so.
- ii. Personal information collected for one reason must not be used for any another unrelated purpose.
- iii. Personal information must not be shared with third parties unless you have asked the person that it may be, and if you are certain it is appropriate/necessary to do so (See Safeguarding Policy). If it is shared with a third party it must be recorded on file. If in doubt, check first.
- iv. All written information in the form of reports, publicity, statistics or feedback must protect the anonymity of individuals or groups.
- v. The Chair of Tavistock Memory Café or nominee will ensure that all employees and volunteers receive appropriate training in relation to the operation of this policy.

## 2. What Information We Collect

We collect data you provide to us. This includes information you give when requesting help, attending the TMC or receiving other forms of support from the TMC, communicating with us, or donating to us. We also collect data if you are volunteering with us. Examples of data include:

- personal details (name, date of birth, email, address, telephone, Disclosure and Barring Service data requirements etc.);
- details of your caring situation including your condition or disability, medication for yourself or the person you care for and your relationship with the person you care for;
- financial information (donation information such as direct debit details, and whether donations are gift-aided).

## 2.1 Information created by your involvement with Tavistock Memory Café (TMC)

Your involvement with TMC will result in personal data being created. This could include

- details of the support options we suggest and services you access.
- details of which services or activities you have used.
- information you have requested:
  - for yourself as carer and the one you care for, names, addresses, telephone numbers, email addresses.

If you decide to donate to us, then we will keep records of when and how much you give to our charity.

## 2.2 Information from third parties

We sometimes receive personal data about individuals from third parties. For example, we may receive from your GP, or Social Services, or any other body that needs to provide us with information about your health, as a result of you being a member of TMC.

## 2.3 Sensitive personal data

We do not collect or store sensitive personal data relating to beliefs or political affiliation. We do hold sensitive health and medical information as a result of your, or the one you care for, being or having been a member of TMC. We take extra care to ensure your privacy rights are protected where sensitive data is held.

## 2.4 Accidents or incidents

If an accident or incident occurs on our property, at one of our events or involving one of our clients or staff (including volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data).

## 2.5 Volunteer

If you are a volunteer (whether specifically for TMC, or if you are helping us for other reasons - for example you work for another organisation which is running an event with us) then we may collect extra information about you (e.g. references, disclosure and barring service checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

### 3. How We Use Information

We only ever use your personal data with your consent, or where it is necessary in order to:

- provide services for you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for (including for closely related purposes).

### 4. Administration

We use personal data for administrative purposes (i.e. to carry on our charity and its services) This includes:

- receiving donations (e.g. direct debits, standing orders, cheques or cash or gift-aid instructions);
- maintaining databases of our members, staff, volunteers, trustees, and supporters;
- performing our obligations to support members;
- fulfilling requests for information on our services (requests may be made online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

### 5. Disclosing and Sharing Data

We will never sell your personal data. If you have opted-in to marketing, and receiving information, we will contact you with information about events, but these communications will always come from TMC and are usually incorporated into our own marketing materials (e.g. newsletters or separate flyers or emails).

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another charity). In these circumstances, we will only share the minimum information necessary, and only when necessary; we will make sure to notify you first.

### 6. Marketing

From May 2018, TMC will ask its supporters to "opt-in" for most communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers our newsletters, fund-raising and other events). This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post or email).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact our Data Controller, or one of the Board of Trustees at the contact details in section 1/ above.

## 6.1 What does 'marketing' mean?

Marketing includes news and information about:

- our charity, campaigns and work in the area of dementia and memory loss
- our role in providing information about memory loss and the work of third parties;
- volunteering opportunities and how you can help those living with dementia;
- appeals and fundraising (including donations and raffles etc.);
- our events, activities and local groups who provide support for those living with dementia;
- services of our own, and those of third parties which may interest you;
- leaving a legacy;

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

## 6.2 Newsletters and magazines

Newsletters and fund-raising details are provided as a benefit to our members. We send these out to all our members (unless you specifically ask us not to) and you can choose to unsubscribe from communications if you wish.

## 7. Fundraising

As a charity, we rely on donations and support from others to continue our memory and dementia support work. From time to time, we will contact members and supporters with fundraising material and communications. As with other marketing communications, we'll only contact you specifically about fundraising if you've opted in to receiving marketing from us (and you can, of course, unsubscribe at any time).

Some of our fundraising is carried out by our volunteers, staff or trustees. We may work with third parties to carry out fundraising on our behalf if they are arranging the event e.g. a concert or garden event.

## 8. Photographs, Pictures, Stories Shared in our newsletters or with third parties

Occasionally we may put a photo of a group activity in our own newsletters, or on our website, or on our Facebook page. We will ask your permission to use your photos. More rarely a third party may want to take a video or photos of events here, and we will always ask the permission of either the client or carer before this takes place or is shared.

## 9. How We Protect Your Data

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of data protection procedures which personnel are required to follow when handling personal data.

## 9.1 Storage

### Where we store information

All relevant information (paperwork and computer data) is kept in safe and secure surroundings except when trustees may have information with them at home.

Some of our digital systems use Microsoft or similar products with cloud storage. We'll allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

### 9.2 How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

## 10. Keeping You in Control

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract.
- Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to the address above or speak to one of the Board of Trustees.

## 11. Complaints

You can complain to Tavistock Memory Cafe directly by contacting one of the Board of Trustees using the details set out above. If you wish to make a complaint which does not directly relate to your data protection and privacy rights, you can do so in accordance with our Complaints Policy which is available on request, or by speaking to one of the Board of Trustees.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner’s Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## 12. Changes to this Policy

We’ll amend this Privacy and Confidentiality Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

Signed by Board of Trustees: .....

Date: November 2023

Review Date: November 2024