



PRIVACY NOTICE

1. Introduction

Carers in Bedfordshire (CIB), charity no. 1135507, is committed to protecting your privacy and security. This Privacy Notice explains when and why Carers in Bedfordshire collects personal information, how we use it, keep it secure and in what circumstances we may share it with other organisations.

This Privacy Notice applies to anyone CIB comes into contact with, including but not exclusively; carers, individuals with care needs, people living with memory loss or dementia, volunteers, supporters, suppliers, professional contacts, staff, the general public.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

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.

Any questions you have in relation to this policy or how we use your personal data should be addressed to the Chief Executive Officer, Carers in Bedfordshire, Suite D1, Emerald Court, The Pilgrim Centre, Brickhill Drive, Bedford, MK41 7PZ. Tel: 0300 111 1919 Email: contact@carersinbeds.org.uk

2. Why we collect information about you

We collect data you provide to us in order to carry out our routine activities to further the mission of the charity. The personal information we collect from you will depend on your connection with Carers in Bedfordshire, for example;

- If you are a carer, person with memory loss or dementia, or other client of CIB, we need to be able to contact you, and have some information about your caring role or condition, in order to deliver a service to you;
- We also need to hold some personal information about clients accessing our services to fulfil our legal obligations to the organisations who fund our work;
- If you are or would like to be a volunteer, we need to know where you live and how to contact you and support you in your volunteering
- If you are a donor to CIB, we need to hold some personal information about you in order to process your donation and satisfy the legal requirements of the Charity Commission and HMRC

- If you are a staff member or contractor, we need to hold some personal data in order to fulfil our contractual obligation to you.

Failure to provide us with the necessary personal information may result in us being unable to provide you with a service or activity. The reasons for this will be explained to you.

3. What Information we collect

Personal data you provide

We collect data you provide to us in the course of our routine activities. This includes information you give when joining or communicating with us, and by the recording of telephone calls by us. For example:

- personal details (name, date of birth, email, address, telephone etc.) when you become a registered carer or client, a volunteer or supporter;
- if you are a carer, details of your caring role, and limited information about the individuals you care for
- financial information (payment information such as credit/debit card or direct debit details, and whether donations are gift-aided;
- Medical and next of kin information when you attend an event when this is necessary.

Specials categories of personal data

Carers in Bedfordshire obtains and processes Special Category Data only where fully justified, including in the following situations:

- Where it is appropriate to carry out diversity monitoring, with the explicit consent of the Data Subjects
- Where the medical diagnosis or condition of an individual client is pertinent or essential for the delivery of the charity's routine activities
- For staff, volunteers or contractors, information about health, including any medical condition, health and sickness records.
- For staff, volunteers or contractors, Information about criminal convictions and offences
- In case of an accident taking place during our activities. Under this circumstance we may be required to share this data with statutory authorities.

We will also ask you for personal information such as your religious beliefs, ethnic background, and sexual orientation, but this information will only be held with your explicit consent. The purpose for collecting this information is for monitoring purposes to help us ensure that our services are fully accessible, our staff and volunteer reflect the community we serve, and to inform the further development of services. It will not restrict clients' access to a service if you choose not to provide this detail.

Information about a third party

If you provide information about a 3rd party (typically either the person you care for or an emergency contact) we will need to confirm that they are aware of this, the personal information that we hold and their rights under data protection legislation.

Information from third parties

We sometimes receive personal data about individuals from third parties. For example, if we receive a referral from another agency. This will usually have taken place with your consent.

If you have supported CIB your information may be shared with us by independent third parties when you have given your consent (for example, Justgiving or Virgin Money Giving). You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Staff, contractors and volunteers

We may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us and you (including in the event of an insurance or legal claim) and for safeguarding purposes.

4. How We Use Information

We will only ever use your personal information for the purpose it was collected and to further our charitable mission. This includes:

- maintaining databases of our clients, volunteers, suppliers, members and supporters;
- performing our obligations under contracts;
- fulfilling orders for goods or services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive specific or marketing material, we'll keep a record of this).

We collect information about you, in order to:

Carers and clients

- provide information, advice and support to you ;
- if you have requested it, send you our quarterly magazine, Carers. This covers services and information of interest to carers, carers' stories and tips, and limited information about the charity's fundraising and volunteering opportunities;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you information on services that we believe may meet your needs, including those provided by other agencies
- inform our future service development to ensure that these are fully accessible
- provide anonymised monitoring information to our funders to demonstrate the take up and effectiveness of services;

You may indicate how you would prefer to hear from us about services, delivered by Carers in Bedfordshire or other agencies, that will support you in your caring role. You may change your preferred communication method at any time.

Volunteers

- keep you up to date with volunteering opportunities;
- seek your views on your volunteering experience ;
- notify you of changes to our services;

Donors and supporters

- receive and process donations (e.g. direct debits or gift-aid instructions);
- fulfil our obligations to the Charity Commission and HMRC

Staff and suppliers

- check your legal entitlement to work in the UK
- paying you, and if you are an employee, deducting tax and National Insurance

- liaising with a pension provider
- administering the contract we have entered in with you

See CIB Privacy Notice: Employees, Workers and Contractors for further information.

And, if you have agreed, send you details of other services or activities including Carers Discount Card offers, job and volunteering opportunities, and details on how to support our work through fundraising. See **Marketing** below.

We do not use automated decision making or profiling.

Anonymised data

We aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information is usually used to report to funding bodies on our charitable activities. This information also helps inform our actions and improve our services.

5. Disclosing and Sharing Data

We will **never** sell or rent your personal data. If you have opted-in to Marketing communications, we may contact you with information about third party products and services, but these communications will always come from CIB and will usually be incorporated into our own communications (e.g. leaflets or articles in magazines or email newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example, our Carers magazine mailing is organised by a third party provider, and, if you have opted to receive the magazine by post, your name and address will be shared with the company we use. These activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you are registered with Dementia services which we operate in partnership with Tibbs Dementia Foundation and the Alzheimer's Society). We'll only share information when necessary and for the purposes that you have provided the data to us.

6. Marketing

Marketing does not just mean offering things for sale. For CIB, marketing means communicating with you about topics including:

- products and services, from CIB and other agencies;
- discounts and offers;
- job opportunities;
- volunteering opportunities, including full membership and opportunities to join the CIB Board
- fundraising and appeals

that you might be interested in but that you would not necessarily expect to hear from us about as part of your primary relationship with us as a carer, volunteer, etc.

We ask for your explicit consent to receive communications about topics such as these. This is called "opt-in". This means you have the choice as to whether you want to receive these marketing messages and be able to select how you want to receive them (post, phone, SMS text message, email).

You can choose to unsubscribe from general marketing communications without giving up your subscription to Carers regular magazine. However, please be aware that Carers magazine does include some fundraising and volunteering information.

You can decide not to receive marketing communications or change how we contact you at any time.

7. Young people

CIB offer support services to young carers under the age of 18, and young people under 18 may also attend other services with their parents or guardians. To deliver these services safely it is necessary for us to collect data.

When we collect and manage information from young people under the age of 18 we aim to manage it in a way which is appropriate for the age of the child. Information is usually collected at the point of referral and/or when young people attend an activity. The information we collect includes medical information for Health and Safety purposes.

We won't use young people's personal data for marketing purposes and we won't profile it.

Parental permission

If your child is under 18 then we'll need permission from you as their parent or guardian for them to be registered with CIB, to attend events without parents or guardians and to be included in a photograph for reporting or promotional purposes.

Information for parents

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 18, we'll only use his or her personal data with your consent.

8. How we protect 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.

All electronic forms that process personal data are encrypted.

Payment security

If you use a debit or credit card to donate or to purchase a product or service we will only collect the relevant payment information needed for the transaction. We will not request pin numbers or bank security information.

9. Storage

Where we store information

The information which you provide to us may be transferred to servers within the European Union ("EU") or countries and companies designated as adequate under the General Data Protection Regulation which provide similar protection to those located in the UK. Some organisations which provide services to us may transfer personal data outside of the EEA, however these transfers will be subject to adequate data protections.

How long we store information

We are required to make sure that we 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.

We typically retain personal and financial information for seven years.

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 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 analysis

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 our Chief Executive Officer, Carers in Bedfordshire, Emerald Court, The Pilgrim Centre, Brickhill Drive, Bedford, MK41 7PZ.

Complaints

You can complain to CIB directly by contacting our Chief Executive Officer using the details set out above. If you wish to make a complaint (including a complaint about fundraising activity) which does not directly relate to your data protection and privacy rights, you can do so in accordance with our charity's complaints policy.

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

11. Cookies and Links to other Sites

Cookies

'Cookies' are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as expected.

Links to other sites

Our websites contain hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working).

If an external website requests personal information from you, the information you provide will not be covered by CiB's Data Protection Policy. We suggest you read the privacy policy of any website before providing any personal information.

Social Media Sites

We operate a number of social media pages (including Facebook, Twitter). Although this policy covers how we will use any data collected from those pages, it does not cover how the providers of social media websites will use your

information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

12. Changes to this Privacy Notice

We'll amend this Privacy Notice 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 Notice will always be posted on our website.

This Privacy Policy was last updated on 25th August 2023.

Appendix One: CIB Privacy Notice: Employees, Workers and Contractors

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

This Notice is intended to be read together with CIB's full privacy notice. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means

- Information about your use of our information and communications systems.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. We have indicated by the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.

- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing the benefits to you such as life insurance, permanent health insurance or a company car.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You

should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate charitable activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following activities may be carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services or HR support.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring information outside the EU

To ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by third parties in a way that is consistent with and which respects the EU and UK laws on data protection: all third parties are asked to confirm that they employ data protection standards at least as robust as those from time to time in force in the EU. If you require further information about this you can request it from a manager.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact a manager in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.