



Changes Bristol Privacy Policy

At Changes Bristol mental health charity, we're committed to protecting and respecting your privacy.

New Regulations and Changes Bristol's commitment to your privacy

From the March 2018, Changes Bristol will ask its supporters and members to "opt-in" for marketing communications. This is due to a change to the rules which govern how we can communicate with you and a new regulation on personal data (the General Data Protection Regulation) coming into force in May 2018. Therefore we are introducing a new approach that relies on you making choices about how we use your information. 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 (email, phone, SMS or post). This Policy explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. We will notify you if there are any changes you should be aware of.

Any questions regarding this Policy and our privacy practices can be sent by email to info@changesbristol.org.uk or by writing to Changes Bristol, Barton Hill Settlement, 43 Ducie Road, Lawrence Hill, Bristol, BS5 0AX or Telephone 0117 941 1123.

WHO ARE WE?

We're Changes Bristol, a local mental health charity that operates in the city of Bristol and the surrounding area. We are a registered charity (charity no 1167828) and a company limited by guarantee (company no 08914724). The registered address is Barton Hill Settlement, 43 Ducie Road, Lawrence Hill, Bristol, BS5 0AX.

We run peer support groups for anyone aged 18 or over who suffer mental distress, providing support and educational materials to improve people's wellbeing. We also provide volunteer opportunities; Psychoeducational programmes; 12 steps to mental health programme; mental health workshops; mental health awareness workshops; mental health in the workplace workshops; Positive Changes workshops and other mental health support.

HOW DO WE COLLECT INFORMATION FROM YOU?

We obtain information about you when you use our website, for example, when you contact us about products and services; when you make a donation; if you register to receive our newsletters; if you become a member; if you volunteer for the charity; and if you become a supporter for the charity.

WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information we collect includes:

Category of Individual	Type of Information
Member	Name
	Email address
	Telephone number
	Diagnosis and Symptoms
	Meeting attended
Supporter	Name
	Email address
	Telephone number
	If you have made a donation online your information is processed by a third party payment processor
Website visitor	IP address
	Information about pages that you have accessed

INFORMATION CREATED BY YOUR INVOLVEMENT WITH CHANGES BRISTOL

Your activities and involvement with Changes Bristol will result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our campaigns and activities.

If you decide to donate to us then we will keep records of when and how much you give to a particular cause.

If you become a voting member we will keep necessary records that are reviewed annually so that we are able to contact you.

If you become a member/service user, we collect information such as your contact details (name, address, email, telephone number) and details such as your diagnosis and/or symptoms and which meeting you attend on a purely voluntary basis.

HOW IS YOUR INFORMATION USED?

We only ever use your personal data in accordance with the following legal bases:

Legitimate interests (“LI”)
<p>Changes will use your information where it is necessary for us to fulfil our legitimate interests, except when your interests and fundamental rights override our legitimate interests.</p> <p>Changes has a legitimate interest in:</p> <ul style="list-style-type: none"> • providing the service of [insert further details about the groups here]; • safeguarding and promoting the welfare of members; • using photographs of you for promotional purposes; • promoting the objects and interests of the charity; This includes fundraising and using information about you in our publicity material – for example, photographs and case studies; • using your information in connection with legal disputes, e.g. if someone brings a claim against Changes; • facilitating the efficient operation of Changes; • ensuring that all relevant legal and regulatory obligations of Changes are complied with (for example in relation to reporting to the Charity Commission).
Necessary for contract (“C”)
<p>Changes will use your information to comply with our contractual obligations and so that you can perform your obligations as well. For example:</p> <ul style="list-style-type: none"> • we need to process your financial information where you make a donation; • we need your contact information when you sign up for an event so that we can send you more details.
Vital interests (“VI”)
<p>If it is necessary to protect your vital interests or the vital interests of someone else we may use your information. This could be to prevent someone from being seriously harmed or killed.</p>
Performance of task carried out in the public interest (“PI”)
<p>We will use your information in the following circumstances to perform tasks in the public interest:</p> <ul style="list-style-type: none"> • looking after your welfare and development and the welfare and development of others; • safeguarding and promoting the welfare of our members; • facilitating the efficient operation of the charity; and • ensuring that we comply with all of our legal obligations.

Changes is also under an obligation to comply with an additional condition where it is processing special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

The bases that Changes is relying on to process special categories of personal information are set out below:

Social security and social protection (“SP”)
Where the processing is necessary for the purposes of carrying out obligations and exercising specific rights of the charity in the field of social security or social protection. Social security and protection is concerned with preventing, managing, and overcoming situations that adversely affect people’s wellbeing. For example, sometimes this would allow us to disclose your information to third parties such as mental health support services.
Vital interests (“VI”)
To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.
Legal claims (“LC”)
The processing is necessary for the establishment, exercise, or defence of legal claims. This allows use to share information with our legal advisors and insurers.
Medical purposes (“MP”)
This includes medical treatment and the management of healthcare services.
Substantial public interest (“SPI”)
Changes is also allowed to use special categories of personal information when doing so is necessary in the substantial public interest. This is similar to “public interest” in the table above.

- process a donation that you have made; (“LI”, “PI”)
- process orders that you have submitted; (“C”)
- to carry out our obligations arising from any contracts entered into by you and us;
- seek your views or comments on the services we provide; (“C”)
- notify you of changes to our services; (“LI”)
- process a grant or job application; (“LO”)
- comply with a legal duty; (“LO”)
- protect your vital interests; (“VI”)
- for our own (or a third party’s) lawful interests, provided your rights don’t override the these. (“VI”)

More than one basis

In some cases we may rely on more than one basis above for a particular use of your information. We may also move from legal basis to another if circumstances change.

Retention

Changes will keep your personal information for as long as we need it to fulfil our obligations to you.

In exceptional circumstances we may keep your information for a longer period of time than usual. Changes will only retain your information we have a good reason and only if this is permitted under data protection law.

Our information and records retention policy has more information about how long we keep your personal information for.



WHO HAS ACCESS TO YOUR INFORMATION?

We will **never** sell or rent your information to third parties.

We will **never** share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf:

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond Changes Bristol for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you are using our secure online donation pages, your donation is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

MARKETING

From March 2018, Changes Bristol will ask its supporters to “opt-in” for some communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about the work Changes Bristol does).

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, phone, email, text).

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 office by emailing info@changesbristol.org.uk, or writing to Changes Bristol, Barton Hill Settlement, 43 Ducie Road, Lawrence Hill, Bristol, BS5 0AX, or telephoning 0117 941 1123..

What does 'marketing' mean?

Marketing does not just mean offering things for sale, but also includes news and information about:

- our charity, campaigns and work;
- our role in educating the public in mental health concerns and battling stigma;
- Changes Bristol benefits and offers;
- volunteering opportunities and how you can help vulnerable people;
- appeals and fundraising (including donations and also competitions, raffles etc.);
- our events, activities and local meetings;
- products, services and offers (our own, and those of third parties which may interest you);
- leaving a legacy; and
- taking part in projects.

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.

Newsletters

We provide newsletter to our supporters and members and you can choose to unsubscribe from general marketing communications at any time.

Fundraising

As a charity, we rely on donations and support from others to continue our mental health work and supporting vulnerable people. From time to time, we will contact members and supporters with fundraising material and communications. This might be about an appeal, a competition we're running, or to suggest ways you can raise funds (e.g. a sponsored event or activity, or even buying a product if Changes Bristol will receive some of the proceeds).

As with other marketing communications, we'll only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).



RESEARCH AND PROFILING

At present we only use profiling in our marketing communications to provide tailored communications and services. We may use profiling in order to contact our members regarding specific services that are helpful to that demographic (for example with older or younger peoples services). This is done with existing information.

INFORMATION WE GENERATE

Anonymised data

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as recruiting new supporters, or to identify trends or patterns within our existing supporter base or with our members. This information helps inform our actions and improve our campaigns, products/services and materials.

PHOTOGRAPHS AND CASE STUDIES

Photographs of individuals are only used with the individuals consent unless stock photos are used in which case the appropriate permissions are obtained.

Case studies will be anonymised unless we have the consent of the individual.

INFORMATION FROM THIRD PARTIES

We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to another charity we're collaborating with when delivering a service). Also, we may use third parties to help us conduct research and analysis on personal data (and this can result in new personal data being created).

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.

Occasionally, we may collect information about certain supporters (e.g. particularly well known or influential people) from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

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 (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Special Category Personal Data

As a mental health charity we are sometimes required to collect special category data either through surveys and monitoring or to ensure services are running correctly and we are able to provide the correct interventions to the right people. We also collect information to ensure good outcomes for our members. Where possible this information is collected on an anonymous basis and we only collect as much information as is deemed appropriate or proportional.

All special category information is stored securely whether kept digitally or through paper sources. All special category data kept for members regarding our services are not shared with third parties unless 1) we are running the service in partnership with another organisation 2) we have a legal or safeguarding duty to share the information or 3) we have been asked to or/and have consent from the member to do so.

WHERE WE STORE INFORMATION

Changes Bristol's operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, 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).

OUR COMMUNICATIONS TO YOU – Your Choices

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:

- **Rectification:** if information Changes holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy of it. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.

- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract; and (c) the information is being processed by us on computer.
- **Object:** you may object to us using your information where:
 - we are using it for direct marketing purposes;
 - we are relying on either the legitimate interests or performance of a task carried out in the public legal basis to use it;
 - we are using it for historical or scientific research purposes or archiving purposes.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

If you would like further information on your rights or wish to exercise them, please write to our Data Protection Officer at Changes Bristol, Barton Hill Settlement, 43 Ducie Road, Lawrence Hill, Bristol, BS5 0AX or email projectmanager@changesbristol.org.uk

SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected.

Other information (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Use of cookies

Like many other websites, the Changes Bristol website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

18 OR UNDER

We are concerned to protect the privacy of children aged 18 or under. If you are aged 18 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

COMPLAINTS

You can complain to Changes Bristol directly by contacting our data protection 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 which can be found on our website or you can email info@changesbristol.org.uk.

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

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in October 2019.