

MRF Trustee, Staff & Office Volunteer Fair Processing Privacy Notice

Introduction

Meningitis Research Foundation, MRF (“we”) promise to safely process and store any personal data you share with us – or is shared with us from partner organisations. We strive to ensure that our paperwork, forms and online platforms are clear about how we will use the data we collect.

If at any time you wish to know more about how we collect, store or use your information you can do so by contacting the charity. As a staff member, trustee or volunteer you can expect the same high standards we apply to our supporter data.

In addition to this policy the charity may hold and process additional data on you outside of your relationship to us as a trustee or staff member. This may include but is not limited to personal experience of the disease, fundraising activities or donations you have made. In these instances you should refer to the charity’s general privacy and fair processing notice.

This processing notice covers provisions legislation described in the Data Protection 2018, the General Data Protection Regulations (GDPR) and 2003 Privacy and Electronic Communications Regulations (PECR). MRF is identified under these regulations as the Data Controller and all officers of the charity as Data Processors.

Basis for data collection & processing

MRF will collect and process data under the following circumstances when;

- you have volunteered information and agreed to its usage as outlined in this and other policies
- processing is necessary in order to carry out normal activities of the charity
- we have a legal or statutory obligation to fulfil

We reserve the right to process your data in accordance of other legitimate interests of MRF, where this is the case a Privacy Impact Assessment will be carried out to ensure your rights under Data Protection legislation are not unduly impacted upon.

In the event of criminal action MRF has the right to share your data with the police or other agencies.

Sources of information about you

We collect information in the following ways:

- When you give it to us DIRECTLY
- When you apply for a position with MRF, this may include data within application forms, CVs, information volunteered at interview
- When you give it to us INDIRECTLY. Your information may be given to us by third parties e.g. recruitment agencies or job websites. These are independent parties and will only do so when you have indicated that you have given your consent for us to have your details. You should check their Privacy Policy when you provide your information so that you understand how they will process your data. We will always make sure that we only work with online platforms who respect the integrity of our supporters’ data
- When you give permission to OTHER ORGANISATIONS to share or it is available publicly. We may combine information you provide to us with information available from external sources in

order to gain a better understanding and improve our methods, products and services. The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

- **Third party organisations**
Information about you may be shared with MRF from third parties such as references from past employment
- **Information available publicly**
This may include information found in places such as Companies House, Charity Commission and information that has been published in social media or the press

What personal data we may collect and how we may use it

The type and quantity of information we may collect and how we use it depends on why you are providing the information.

All personal data is processed in accordance with our obligations under applicable data protection laws and regulations, for the following reasons;

- to provide you with the services you have requested
- to comply with applicable laws and regulations; for administrative purposes
- to assess enquiries
- to provide you with information about us and our services

The list is not exhaustive should you want to know why MRF is collecting data, please contact us at carolc@meningitis.org or by posting to our registered head office at Newminster House, 27-29 Baldwin Street, Bristol, BS1 1LT UK.

Typically we will collect and store the following information;

- Name and contact details;
- Details of salary and benefits, bank/building society, National Insurance and tax information, your age; Information collected during the recruitment process that we retain during your employment;
- Employment contract information;
- Next of kin / emergency contact details;
- Your nationality and immigration status and information from related documents, such as your passport;
- Details of your pension arrangements, and all information necessary to implement and administer them;
- Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health)*
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs*;
- Your trade union membership*;
- Information on grievances raised by or involving you;
- Information on conduct and/or other disciplinary issues involving you;
- Details of your performance eg appraisals, reviews and improvement plans;
- Details of you time and attendance records*;
- Information in applications you make for other positions within our organisation;

- Your image, in photographic and video form;
- Details in references about you that we give to others.

Depending on the nature of your work we may also ask for;

- details of personal devices used to access MRF systems and data
- details of social media accounts used in a work capacity
- details of other organisations you are connected with

We will mainly use your data to;

- perform any legal obligations (e.g. Health and Safety) and checks around your right to work
- assess your suitability for a role with MRF
- report to statutory and other regulators
- process payments and / or salaries
- substantial public interest (e.g. Equal Opportunities)

*Sensitive Personal information: Before processing any sensitive personal information, staff must notify the Data Protection Contact of the proposed processing, in order that the Data Protection Contact may assess whether the processing complies with the special conditions for processing sensitive personal information.

How we keep your data safe and who has access

We ensure that there are appropriate technical controls in place to protect your personal details. We have measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. For example, our online forms are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors. We ensure that individuals who have access to your personal information have a genuine business need to know it.

Where an external company has collected data on our behalf, we run comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

Access to some information may be limited to certain staff, examples include:

- Equal opportunities data will be separated from the rest of your data and will be anonymised as part of our monitoring processes
- Bank data will be stored within Sage with password access restricted to the finance team
- Data relating to your past employment and performance whilst at MRF will be stored in a locked cabinet. Access to these documents is limited to the Chief Executive, members of the senior team, your line manager and the HR/Admin officer

For full details on the information we store and security arrangements you should refer to the MRF Data Inventory.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

MRF takes every possible step to ensure that your data is held within the European Economic Area (EEA). However some activities, funders or partners may require us to share your data outside of this area. Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA. Disclosure of your information

Personal information may be shared with other parties, such as group companies and/or affiliated companies, external contractors and our professional advisers, including legal and financial advisors, HR advisors, your doctors, medical and occupational health professionals we engage, our insurers, your trade union, our bank, recipients of references or interested third parties. The receipt of the personal information will be bound by confidentiality obligations.

We may also disclose your personal information to comply with any legal obligation, or to enforce or apply any agreements; or to protect the rights, property, or safety of MRF, or others. This includes exchanging information with other organisations for the purposes of safeguarding or other statutory regulations we have to comply with.

Limited information will be published on MRF's website and official publications. Typically this will be limited to your name, position and may include your photograph. In some circumstances such as reporting to regulators we may also disclose other information such as your address. Where this is the case you will be notified.

Keeping your information up to date

MRF has an obligation to keep any information we hold on you up to date. Any changes you notify us will be updated within 3 working days.

We may use publicly available sources to keep your records up to date; for example, the Post Office's National Change of Address database and information provided to us by other organisations as described above.

Retention of data

All data held by the charity is regularly reviewed to ensure that it is only being kept and processed for an appropriate period of time. Staff, trustee and volunteer data may be retained for longer than MRF's standard retention policy in order to meet regulator and statutory obligations.

We keep personal information during and after your employment for no longer than is necessary and in the majority of cases for no more than 6 years after the end of your employment.

Full details are available in the MRF Data Inventory.

Your rights

You have a right to ask us to stop processing your personal data, and if it is not necessary for the purpose you provided it to us for, we will do so. However, in some cases MRF will be required by law to continue to process your data after this request e.g. tax payments or legal proceedings.

You have the right to request deletion of your data, however as with the right to cease processing MRF retains the right not to delete data necessary to continue our legal obligations.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

There is no charge to access your data. Should you wish to exercise this right you should complete the Subject Access Request form, available from us. If documents contain information relating to another individual such details will be redacted before you are given access.

Further information or complaints

Should you require any more information on any point covered in this document you should us or consult MRF's other data protection policies.

Should you wish to seek independent advice or make a complaint, please contact the Information Commission Office at <https://ico.org.uk/concerns/> for further information about your rights.

Changes to this notification

This notice was last updated on 26th March 2019. MRF reserves the right to vary this notification from time to time. Such variations become effective on posting on the website and/or the staff handbook.

You will be made of aware of any changes deemed to be significant.

Any subsequent submission of personal information to MRF will be deemed to signify your acceptance to the variations.

If you have any questions, comments or suggestions, please let us know by contacting us on carolc@meningitis.org or by posting to our registered head office at Newminster House, 27-29 Baldwin Street, Bristol, BS1 1LT UK.

Document history

Version 1 – Agreed 1st May 2018

Version 2 – 26th March 2019. Addition of DPO details. Additional information in regards to what personal data may be collected and who it may be shared with. Removed details of retention of data.