



Data Protection Policy

Aims of this Policy

Bipolar UK needs to obtain and keep certain information on its staff, volunteers, service users and donors in order to carry out its day to day operations, meet its objectives and comply with legal obligations.

Bipolar UK is committed to ensuring that any personal data is dealt with in accordance with the requirements of the General Data Protection Regulation ("GDPR"), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulation ("PECR").

This policy, including the privacy policy information given on Bipolar UK's website, which can be accessed at <https://www.bipolaruk.org/privacy-notice> and is attached as Appendix A, is intended to ensure that everyone handling personal data is aware of these requirements and acts in accordance with them.

Scope

This policy covers employed staff and volunteers, including trustees, of Bipolar UK when collecting, filing, using, transferring or otherwise dealing with ("processing") any personal data.

Personal data includes any information relating to an identified or identifiable individual ("data subject"). Identification for this purpose may be direct or indirect and includes online identifiers.

Both electronically held data and physical filing systems are covered.

Basic Principles

Bipolar UK will ensure that personal data is:

- processed lawfully, fairly and in a transparent manner
- only collected for specified, clear and legitimate purposes and not subsequently dealt with for different purposes
- adequate, relevant and limited to what is needed for those purposes

Approved June 2019

- as far as possible, accurate and up to date
 - not kept in a form which allows identification of the relevant individual longer than necessary
 - kept securely and confidentially
- and that individuals are informed of their rights relating to personal data held by Bipolar UK and able to exercise them easily.

Lawful basis for data collection and processing - legitimate interests of Bipolar UK

The lawful basis that Bipolar UK normally uses for data collection and processing is that the information is needed to pursue its legitimate interest in carrying out its charitable purposes of supporting those affected by bipolar and acting as their voice in the UK. This includes activities such as the provision of services, peer support, fund raising, dealing with staff and volunteers, research, communication and evaluation.

Important as these purposes are for Bipolar UK, for those affected by bipolar and for society as a whole they must be balanced with the rights and interests of the individuals to whom the data relates. Accordingly Bipolar UK will ensure that personal data collection and processing:

- is limited to that needed to carry out its charitable purposes in a targeted and proportionate way
- is not carried out if Bipolar UK considers the individual's rights and interests override its legitimate interests
- is no more intrusive than necessary
- does not cause unjustified harm to individuals
- is done in a way which the individuals concerned would reasonably expect, unless there is a very good reason, and
- considers safeguards and opt outs to reduce its impact if appropriate and practicable.

Consent

Generally no consent is needed when processing data on the basis of Bipolar UK's legitimate interests. However:

- If the individual concerned asks Bipolar UK to stop processing their data for direct marketing - which includes any promotion of Bipolar UK and its purposes, not just fundraising - Bipolar UK will stop immediately.
- If the individual concerned asks Bipolar UK to stop processing their data for any other purpose Bipolar UK will stop unless it is satisfied that the legitimate interest in continuing is so strong that it justifies overriding the individual's rights.

Special Category Data

- Express consent under the GDPR is generally needed from the individual concerned before collecting and processing what is known as “special category data” unless another special justification applies. Most importantly for Bipolar UK this includes health data, such as information on whether someone has bipolar, as well as other matters such as race, religion, ethnic origin, politics, trade union membership, genetics, biometrics, sex life and sexual orientation.
- Bipolar UK will frequently need to obtain and record information about a person’s health in order to provide services or deal appropriately with a volunteer or other individual or evaluate its activities but will obtain and record consent before doing so except in the limited circumstances mentioned below. Bipolar UK will not retain health or other special category data in a form which can be linked to an individual unless it obtains that individual’s consent, or the circumstances below apply, but may retain special category data in a fully anonymized form.
- Consent is not required if:
 - A. the individual concerned has manifestly made the special category data public themselves; or
 - B. the information is needed to carry out the obligations or exercise the rights of Bipolar UK or the data subject in the field of employment or social protection; or
 - C. the data subject is physically or legally incapable of giving consent and the information is needed to protect someone’s life. If a staff member or volunteer considers there to be a life threatening situation of this kind it is the policy of Bipolar UK that priority should be given to protecting life but your line manager and Finance should be informed as soon as possible.

There are certain other grounds for processing special category data without consent and we are considering these further. However they are less clear and it is not the policy of Bipolar UK to use them unless special clearance is given by the Chief Executive (Simon Kitchen) and Finance Manager (Kelly Cuttle).

PECR

- Consent under the PECR is needed from the individual before making an unsolicited communication by:
 - Email
 - Text message
 - Fax
 - Other electronic means
 - Telephone if the person’s number is registered on the TPS (Telephone Preference Service) or the person has told Bipolar UK not to telephone.

Bipolar UK will ensure that when it asks for consent to data processing or communications the request

- is clear and not mixed up with other matters
- is not made a condition for providing a service

- explains why the data is wanted and what it will be used for
- discloses any third parties who will rely on the consent
- explains that individuals can withdraw consent at any time, and
- that Bipolar UK keeps appropriate records of consents given.

Children

Additional protections apply to data relating to children under 13. Bipolar UK does not currently provide services to those under 17 and will not collect or process personal data relating to those under 13.

Information for data subjects

Individuals must be given information about Bipolar UK's data collection and processing and the reasons for it and about their rights both before information is collected from them and on an ongoing basis.

Bipolar UK provides this information through the privacy policy information notice on its website and will refer people to this notice as part of the explanation given to them whenever data is collected or queries raised.

Exercise of individual rights

Data subjects have a number of rights under the GDPR, including rights of access, rectification, erasure, restriction and objection. These, and the way in which they can be exercised are summarised in the website privacy policy information notice.

If anyone wishes to exercise any of these rights or has any data protection query they should be answered in accordance with the website notice and also referred immediately to the Finance Manager (using the email address data@bipolaruk.org for ease of record keeping) so that she can ensure that the correct action is taken and records kept. Action must be taken within a month so the Chief Executive should also be notified if the Finance Manager is unavailable.

Gathering and checking information

Before personal information is obtained we will consider what details are necessary for the intended purpose, that the purpose is legitimate, whether there is a more limited and less intrusive way to fulfil the purpose, whether anyone could be harmed by the data processing and how long we are likely to need the information.

If a new category of data is being collected, personal data is being used for new purposes, or there are other changes to data collection and processing, your line manager must be consulted in advance to make sure that the appropriate legitimate interest assessment and disclosures are made, including any appropriate changes to the website privacy information notice.

If health or other special category data is involved we will ensure that we have and record the individual's express consent to Bipolar UK processing that data, or record the other permitted justification for processing the special category data, before collecting and processing the information.

If email, text or other electronic means of communication are proposed we will ensure that we have and record the individual's advance consent to that type of communication.

We will take appropriate steps, including in all cases reference to our website privacy policy notice, to inform individuals in advance of collecting their information about why the information is being gathered, what it will be used for, who will have access to it and what their rights are in relation to it.

When obtaining information directly from individuals we will seek to ensure this data is accurate as far as practicable. Where data is obtained from third parties we will follow up to confirm accuracy, for example job references.

Data security

Bipolar UK will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss, disclosure or damage. The measures taken include but are not limited to:

- Secured offices using lockable cabinets (restricted access to keys)
- Clear desk policy and out of hours review
- Computer systems established to allow restricted access to files
- Password protection on personal information files
- Remote and secure back up of data held on computers
- Limited sharing of personal data externally and password protection of email attachments containing personal data
- Staff are only allowed to access personal data outside the office via Remote Desktop access and are not permitted to store personal data locally on Bipolar UK or send it to or store it on personal devices
- External data storage (e.g. memory sticks) must not be used for any personal data. If it is essential to use external data storage, rather than Remote Desktop access, for other Bipolar UK material (e.g. for an external presentation which does not include personal data) clearance should be obtained from the Finance Manager or CEO and encryption or password protection should be used.
- Staff are not permitted to use personal e-mail accounts to send and receive Bipolar UK emails
- Staff are not permitted to share their login passwords to circumvent access restrictions
- Staff are required to change their login passwords at least every six months. Bipolar UK will change the login password of anyone who leaves the organization.

- Staff and volunteers are required to use “bcc” field (not cc) when emailing groups of people
- IT inventory must be kept up to date with the location of all IT equipment. Staff must get clearance before removing any IT equipment from the office and report any lost/stolen equipment to the Finance Manager or CEO immediately.

Any unauthorised disclosure of personal data to a third party or other breach of this policy by an employee may result in disciplinary proceedings.

The Board and trustees are accountable for this policy. A trustee could be personally liable for any penalty arising from a breach they have made.

Any unauthorised disclosure or other breach of this policy by a volunteer may result in the termination of volunteering.

Data breach

Any breach of data security or other breach of this policy must be reported immediately to The Finance Manager so that they can assess whether a report should be made to the Information Commissioner and what other action should be taken. Reports to the Information Commissioner must be made within 72 hours.

Third parties

If Bipolar UK uses a third party to collect or process personal data for it or otherwise works with third parties to control, collect or process personal data it will ensure that appropriate contracts are in place covering data protection responsibilities in accordance with the legislation.

Responsibilities

Bipolar UK is registered as a data controller on the public register maintained by the Information Commissioner. The notification is renewed annually and any interim changes are notified to the Information Commissioner within 28 days.

Overall responsibility for the protection of personal data by Bipolar UK rests with its governing body, the Board of Trustees. The Chief Executive has overall delegated responsibility for data protection and this policy and the Finance Manager has day to day responsibility.

All staff, volunteers and trustees who process personal information must ensure that they understand and act in accordance with this policy and the requirements of the data protection legislation. Failure to do so can lead to disciplinary action by Bipolar UK and breach of the legislation is also a criminal offence for which individuals can be liable.

Training

All staff, and volunteers as appropriate, will receive training on data protection as part of their induction to Bipolar UK, as part of ongoing supervision by line managers and at regular intervals.

Review

This policy will be reviewed every two years by the Board of Trustees to ensure it remains up to date and compliant with the law. Ongoing monitoring, including an annual review, will be undertaken by the Senior Management Team.

Staff and volunteers are encouraged to raise any questions about data protection, and any suggestions for improvement of this policy and the processes and procedures of Bipolar UK in relation to personal data, promptly with the Finance Manager or their line manager.

Any concerns about compliance must be raised immediately with the Finance Manager and the Chief Executive.

Appendix 1

Privacy Notice

Your personal information is just that; yours. Bipolar UK Limited understands the value we all put on our personal data, which is why we're careful to protect the information we hold and keep a check to ensure we only hold the data we need. What follows is an overview of how we look after your information and why. We're more than happy to have a chat about data protection or answer specific questions you may have. Please email us on data@bipolaruk.org.

Privacy Principles:

- When will we ask you for information?
- How do we collect information about you
- What information we collect
- Cookies
- If we support you
- If you support us
- Getting to know you
- Sharing your story
- Our legal basis for processing information
- What we do to protect your data and how long we keep it
- Your choice
- Changes to our privacy notice
- Contacting us

Privacy Principles

We have never sold nor swapped your data – and we won't do this in the future. Your data is protected within the charity - only team members who need your information can access your information.

With every newsletter and fundraising appeal, we make sure you can change your communication preferences or opt out altogether. We're especially sensitive when engaging vulnerable adults through our services and through our fundraising.

1. We work hard to safeguard your information through security policies and protocols.
2. We understand that data protection is an ongoing commitment, not a static policy.
3. We want to be fair and transparent over our handling of your data
4. We aim only to collect, hold and process what we need and only for as long as we need it

When will we ask you for information?

We may collect personal information (e.g. your name, contact number or address) from you when you:

- Join our eCommunity
- Use one of our bipolar support services
- Make a donation or commit to making a future donation
- Make a purchase from our online shop
- Enquire about or sign up for a fundraising event
- Request bipolar support materials from us
- Apply to volunteer or work with us

How do we collect information about you?

Almost all of the information we collect about you comes directly from you. This means that you are able to determine what we do with your data from the very start. You're most likely to have been in touch via our website or email first, but we also start the data collection process in Support Groups or if we speak on the phone or even face to face.

We use third-party companies, such as JustGiving and CAF Donate, and payroll giving agencies to collect and process personal data on our behalf. Third party companies only provide us with your data if you have given them permission to do so. Otherwise, your information is anonymised before it is passed to us.

What information we collect

We try to record what you're interested in and what moved you to get in touch. For example, if you got in touch to discuss a local Support Group, the relevant service team will ask your permission to keep your information on record, so that they can keep you updated on groups.

We keep track of any correspondence and link it to future and past communication. We aim to make a note of what we've previously discussed with you (whether by phone, post or email) so that we don't repeat the same message or ask you to repeat information you have previously given us. We can tailor our conversations and communications based on what has been said before and the topics that interest you.

If you contact our services, they may collect health information, such as your experiences of bipolar but will seek your consent before recording this. If you contact the fundraising team, they only record that you have bipolar if you freely offer such information and consent to their recording this. The fundraising team cannot see the services teams' records and vice versa. Other sensitive data in relation to matters such as ethnicity, sexuality and religion is only collected if you agree to provide it and is processed in an anonymised form in order to analyse the provision of our services and ensure that we are acting in an inclusive and non-discriminatory way.

Both services and fundraising teams may take note of where you work if you tell us. Employment Support advice team can be given most effectively if we only deliver their most effective advice if they have a clear view of your workplace. The fundraising team are hoping to increase the number of corporate supporters of Bipolar UK and know the most effective way to do so is by galvanising internal champions.

If you make a donation, the fundraising team collects financial information, such as debit/credit card details and/or bank details for Direct Debits. The moment debit/credit card information is input into our third party site for payment, it is shielded from us – we cannot recall the data. Bank details for Direct Debits are securely stored with our processing partners and on our internal, separately secured database.

If you're taking part in an event for us, we may ask for your next of kin contact details in the case of emergency. We will never contact that individual for any other reason without their express permission.

If the fundraising team understand that you have the ability to make a large donation, they will run a search on sites like Google, Companies House and LinkedIn for publicly available information to get a better view of your capacity and propensity to make a donation, your interest in mental health and bipolar, as well as your networks. The fundraising team also try to make sure that there isn't anything they should be aware of that may harm the reputation of the charity by association. The resulting profile is kept on record.

More generally, we look at information on our website, including which pages people visit the most or which link in our eNewsletter was most popular. We use services like Google Analytics to help us better understand how our website is used. This means we can look at aggregate data to see any patterns or trends (like a spike in FAQs following Stacey's story on EastEnders) that can help us measure the success of an activity and better prepare for similar activities in the future. We use anonymised aggregate data, but Google Analytics does offer information on IP addresses.

Cookies

Cookies are used in some areas of the Bipolar UK website to identify your computer to our server and help us to track how many visitors we get. This information is anonymous and cannot be used to track exactly who is viewing what. We use this information to monitor traffic trends and plan development of our website. We use Google Analytics to help us understand how people use our website, see how our visitors find us and identify ways to improve visitor experience. We do not sell this information to third parties.

Our website cannot operate effectively without these cookies and by using this website you are agreeing to their use. The only way to avoid using cookies is to either not use this site or to change the settings on your computer to refuse them. However, this may mean some sections of the site will not work properly for you.

For information on how to turn off cookies, please see your browser's Help menu or visit www.allaboutcookies.org

If we support you

The data we collect in order to provide you with bipolar support is managed separately from marketing or fundraising data.

Collecting and holding sensitive information is necessary for us to provide you with valuable advice, support and guidance. We also use service data for training, quality monitoring and evaluating the services we provide. When you sign up for our eCommunity we ask you to provide contact and demographic information, so we can reach you if we're concerned about a post and so we can analyse and understand our service impact. Your posts are not publicly identifiable unless you choose to make them so.

When you attend a Support Group, you will be invited to complete a contact consent form. If you chose to complete this form, your volunteer co-facilitator will keep you updated on Support Group news in general and your Support Group in particular and we can provide you with broader updates on the activities of Bipolar UK and its fundraising activities. We analyse service user contact across the charity, looking at whether individuals use more than one service and your journey within the organisation. This is particularly useful for us to be able to monitor our impact.

Bipolar UK services are confidential services. We will, however, share what you tell us with someone if:

- You ask us to get you help because you can't do this yourself.
- We believe your life and wellbeing is at immediate risk.
- We believe another person's life and wellbeing is at immediate risk.
- We are told about acts of terrorism or bomb warnings.
- We are told about criminal acts or the intention to undertake a criminal act.
- We always want to give you as much control as possible and will explain our policy to you and tell you if we feel we might need to contact emergency services to help you access support.

General and service telephone conversations are automatically and securely recorded. If you contact us by phone we will be able to see your phone number and might use this in the case of any of the above situations. If you contact us by email, we will be able to see your email address and your IP address.

If you support us

Volunteers

Depending on your volunteer role, volunteers are likely to be asked to undergo a DBS check (previously CRB check), renewable every three years. We process DBS checks through Mayflower Disclosure Services Ltd. The DBS check process is set out by the Disclosure and Barring Service, a government body. This process

includes specifying what proof of ID and address information is required. We complete the form and authenticate the IDs to Mayflower. Once a DBS check has been cleared and received, we shred and/or delete any personal information but keep the record that a DBS check was made.

For many of our volunteer roles, we will ask you to complete a form and references and make notes of our assessment. Both documents, along with your volunteer application form are retained for the lifespan of your engagement within Bipolar UK and for a period of one year thereafter or such longer period as is necessary for safeguarding, legal, contractual or insurance purposes or in case of a claim. Only nominated 'volunteer coordinators' within directly relevant services and our central administration will have access to the otherwise restricted files. We keep the personal information of those making unsuccessful applications for 1 year after the date of the application in case there are follow up queries about the process. After that we delete it unless the candidate requests that we keep their details for longer or we need to keep a note that an unsuccessful application was made.

Emergency contact information will be asked of you, should you be travelling as part of your volunteer work for Bipolar UK or should you be working alone. For example, if you are travelling to a workplace to give an awareness talk on bipolar. Such contact information is stored for an agreed period and then destroyed. We do not add emergency contact information to our contact database.

All service user and volunteer data is held securely and can only be accessed by the relevant service team and (as necessary) IT support.

Supporters

We store information on our donor database. The secure database is only accessible by the fundraising team and (as necessary) IT support. At a base level, we aim to collect your name and address. This is because we cannot match past or future donation to the same person by name alone and because, should you complete a Gift Aid declaration, HMRC requires full name and address details for a claim to be valid.

We also ask for email addresses because it's a cost-effective way for us to keep in touch. We try to complement postal communication with email communication, but only if you have told us you're happy for us to email you. If you make a donation by credit/debit card, whether over the phone or online, payment details are sent directly to Stripe, our card payment processing partner. Once the card details are entered, we cannot see or retrieve the information and it is not held on our systems. We do not automatically record and store fundraising calls because of the financial information that may be shared in the course of the conversation.

If you set up a Direct Debit, we securely store your details as it is a recurring payment and we need to be able to match future changes (cancellations, upgrades) against account information. Our Direct Debit partners are Go Cardless and Smart Debit.

When posting appeals, we hire a mailing house, which combines printing, packing and posting the letters. Mailing houses are contracted on a campaign basis. The mailing house receives the name and address information needed to do their job (via

secure transfer) but, by contract, they do not have permission to hold or use the data beyond the lifespan of each job.

Please remember to let us know if you move house, even if you have opted out of receiving letters. This is because your Gift Aid declaration is only valid if matched against a current address and we do not currently use Royal Mail's National Change of Address service.

Getting to know you

We know people support our work for a variety of reasons. It helps us in the fundraising team to understand what those reasons are so we can communicate with you in an appropriate way. For example, if you support our work because you have direct experience of bipolar, you probably won't get much value from a letter explaining to you what bipolar is – you already know.

For us to communicate with you the right way, we do need to have an accurate picture of who you are. This means we may ask you to let us know what motivated you to donate or how you feel about our work. The information you provide offers insight that we analyse to plan our activities.

If someone has provided an address in writing we can't decipher, we'll use Royal Mail's address finder service. When we're sending planned appeals, we'll use a screening company to check that no one on the list has recently passed away. The last thing we want to do is send an appeal bearing the name of a lost loved one only for their next of kin to receive it. We also analyse email results, such as open rate and click-through. We don't want to waste anyone's time on emails that no one is reading, so it's important to be able to see what messaging people are interested in.

We may also look at publicly held information through the charity commission, companies' house and Google, to better understand you and your philanthropic priorities so that we can be measured in who we approach for substantial support. Research of this kind is important because there is a risk to the charity if we unwittingly align ourselves with someone that would undermine the trust we have built with our service users or damage our reputation. We also don't wish to waste prospective donors' time by making uninformed approaches. For instance, there is no point in us writing a letter to someone who has publicly declared that they are solely committed to supporting international development charities. We can only know that by researching the person using publicly held information and storing it against their record so that we don't have to repeat the research in the future.

Sharing your story

We are grateful to you when you share with us your experience of bipolar. Case studies, quotes and stories bring bipolar to life for people who may not otherwise understand the illness. Sharing your story is a powerful communication tool but we respect the privacy of our service users.

Service user case studies and quotes are anonymised, with names and identifying information changed unless you have consented for us to use your real name. We

do not otherwise alter the facts of any story, nor do we produce composite service user case studies.

We seek express permission to use a supporter's story before publishing any fund raising or other case study which is not anonymous. Wherever practical, service user and fundraising stories are shown to the subject for prior approval. Your image (photo/video) would only ever be used with your express consent for use in online and offline publications.

Our legal basis for processing information

Our principal reason for collecting and processing information is always to pursue our legitimate interest in carrying out Bipolar UK's charitable purposes of supporting all those affected by the much misunderstood and devastating condition of bipolar and acting as their voice in the UK. This includes raising funds for those purposes and the other activities described in this policy.

We may contact you by post or telephone, unless you ask us not to do so. We will only contact you by e-mail, text or mobile phone if you have consented to our doing so. Sometimes we may also have to process your information in order to fulfil our legal obligations, carry out a contract with you or safeguard your vital interests or those of someone else.

What we do to protect your data and how long we keep it

We ensure there are clear standard operating procedures in place for handling data. This includes limiting access to personal data to individuals who must log in with a unique username for access.

In the interest of security, we do not publicly state our internal technical and operational measures for protecting your data. We will state however that we challenge and review our processes on a regular basis to keep step with changing technology and expectations, and we also require all those providing services to us to maintain secure procedures. We may need to disclose details if we are required to by authorities including the police, HMRC and regulatory bodies.

The length of time we keep your information depends on its nature and is subject to your rights to request deletion. Generally, information needed to communicate with you is kept until you ask to leave the relevant mailing list or we have reason to believe the information is out of date or erroneous. When you ask us not to contact you then we may keep information needed to check that we do not inadvertently contact you. Service user information may be retained for 5 years or such longer period as is necessary for safeguarding, legal, contractual or insurance purposes or in case of a claim.

Your choice

Whenever we are using your personal data on the basis of consent (e.g. by contacting you by e-mail or text message) you can withdraw that consent at any time. You can ask us to stop processing your personal data for direct marketing and,

except to the extent we need your information to process a parallel request from you (e.g. registering for an event), we will stop. You can ask us for a copy of the information we hold about you. If your information is incorrect, out of date or if there is no longer justification for us to hold it you can ask for it to be updated, removed or blocked from use. You can also opt out of fundraising or marketing communications at any time.

Please contact us on fundraising@bipolaruk.org or 0333 323 3780 to request that we update your preferences. It's important to note that we may still have to contact you for administrative purposes. For instance, if your Direct Debit is amended or cancelled, we will write you a letter or email to confirm the action.

Changes to our Privacy Notice

We may update this notice from time to time as regulation or our internal processes change.

If we make a significant change to this notice, we will advertise the amendment on the Bipolar UK website. If you wish to be contacted directly in the event of significant changes to the Privacy Notice, please send your contact details and request to data@bipolaruk.org

Contacting us

If you want to access the information we hold on you, update information we hold, request or opt out of marketing communications, change the way we process your information or have any question, comment or suggestions about how we look after your personal data, please contact us by writing to data@bipolaruk.org or Data Protection, Bipolar UK, 11 Belgrave Road, London, SW1V 1RB.

If you are not happy with anything do contact us first so that we can resolve any problem or query. You can also get in touch with the Information Commissioner's Office, using their helpline 0303 123 113 or at www.ico.org.uk