



PRIVACY AND DATA PROTECTION POLICY

Devised in keeping with the Data Protection Act (2018), the Privacy and Electronic Communications (EC Directive) Regulations (2003), and the General Data Protection Regulation (2018).

We are committed to protecting the privacy of our supporters, Local Partners and beneficiaries. This policy outlines what data we collect, where it is held, and how it is used.

If you have any questions concerning your personal data and how we look after it then please contact us at info@musicastherapy.org. If you would like to update how you would like to hear from us please use our online form, which can be found on our website.

1. BENEFICIARIES

Collecting and Processing Information

We do not hold any personal data for our project beneficiaries (i.e. children and adults who access music sessions within projects we deliver, or within consequent activities delivered by our Local Partners). Any information relating to project beneficiaries is anonymised and securely stored in the relevant project file, either in paper or electronic form. Photographs and film footage may only be obtained with consent, and consent is also sought in terms of how we make use of this data (this is detailed in our separate *Consent Policy*).

Alongside the legal requirements of GDPR, Music Therapists – as registered Allied Health Professionals – have a professional and legal responsibility to respect and protect the confidentiality of service users at all times. Confidentiality means protecting personal information.

2. DONORS AND OTHER CONTACTS

i) Collecting, Processing and Storing Information

We do collect and hold personal data for:

- those who have completed a consent form and/or set up a regular payment (see section ii);
- those we hold written or verbal contracts with, including service providers and freelance workers;
- individuals who are actively involved in the charity's work, e.g. Project Partners, Trustees, Advisory Panel members, project contributors.

We will only hold personal information for as long as reasonably necessary to carry out services and administer their relationship with us, unless we are required to hold it longer for legal or taxation reasons.

Information is held on our database, which is securely stored online, and/or on Tresorit, which is an end-to-end encrypted cloud storage. We use MailChimp for our newsletters, so the names and email addresses of subscribers are saved in this secure system. We also hold paper records of Direct Debit forms, historic Standing Orders, Gift Aid declarations and paper consent forms, which are stored in a locked cupboard in our office.

We do our best to keep all the information we hold up to date. This includes monitoring returned mail. We encourage all our supporters to let us know if their contact details change.

We always:

- communicate clearly about why we need to collect personal information and what we are going to use it for;
- make it easy for supporters to tell us how they would like us to keep in touch;
- collect only the information we need; and
- take good care of all personal information, and make sure it is up to date, safe and secure.

We will never:

- sell contacts' personal information, or let other organisations use it for marketing.

We only share personal information with people and organisations with the supporter's full knowledge and consent, and only if it is necessary to carry out the charity's activities.

We use the information shared with us to:

- make sure all contacts receive the information they've requested, in the manner they've specified (e.g. email or post); and
- carry out reasonable administration of donations, volunteering and other services.

We generally collect the following information from our contacts:

- Name and address
- Email address and/or telephone numbers
- Date of birth
- Bank details (only where the supporter has requested the set-up of a Direct Debit)
- How they would like to hear from us
- How they are, or have been, involved with *Music as Therapy International* (for example, former volunteer, regular donor, etc.)
- Details of donations, Gift Aid Declarations, and consent forms
- Additional information required to fulfil the "Know Your Donor" requirements for anti-money laundering purposes. (This is detailed in our separate *Major Donors and Anti-Money Laundering Policy*)
- Details of enquiries and correspondence

If we dispose of personal information it will always be done securely.

Anyone who chooses to share their information with us will be agreeing to our collection and use of their information as described in this policy.

Supporters and contacts can email info@musicastherapy.org at any time to request that we stop processing their personal information.

ii) Marketing and Communications

Donors

If a supporter has set up a regular payment such as a Direct Debit, we will contact the supporter to confirm this has been set up, to thank them, and to keep them up to date with any relevant administration regarding their regular donations.

If a single donation is made, we will thank the supporter for their donation, and let them know how their contribution has helped us. The donor will not be sent further information on the charity unless they have completed a consent form opting in to further communications from us.

All Contacts

All contacts (including donors and supporters) are free to choose whether they would like to receive charity updates, information and fundraising appeals. They are free to change their mind at any time and we will ensure all preferences are kept up to date.

We only contact our supporters by the means in which they have indicated in their consent form, and all communications include information on how to update their preferences or opt out.

Employment and Volunteer Applicants

Personal information pertaining to employment or volunteer applicants will be processed as needed for the purposes of recruitment. Any identification documentation provided to us by project contributors or representatives is securely stored in the relevant project file (this could be in electronic and/or paper format) for the duration of their involvement with us. Applicants and project contributors will not receive marketing communications or charity updates unless they have completed a consent form stating they'd like to receive these. Information will not be held any longer than is necessary to complete recruitment processes and administration of any subsequent project involvement (where relevant).

iii) Access to Personal Information

The security of our contacts' personal information is paramount to us. Our database is stored online in a secure manner. Our contacts' personal information will only be accessible to our staff, certain volunteers and contractors if it is required in order for them to carry out their role and in compliance with this policy. We never sell personal information, or let other organisations use it for their own purposes.

We only share personal information where:

- we are legally required to, or as a result of a lawful request by a governmental or law enforcement authority;
- it is necessary to carry out the charity's activities, AND only if the person has given informed consent for the information to be shared.

iv) The Rights of our contacts

Our contacts have the right to a copy of the information held about them. This is called a subject access request. Contacts also have the right to have incorrect information corrected and the right to opt out of further processing of their personal information for direct marketing.

Subject access requests, personal information updates, and opt-out requests should be emailed to: info@musicasterapy.org.

Contacts can also update their preferences or opt out of communications by completing our online consent form, or by contacting us in writing.

For questions about this policy and your rights regarding the processing of your personal information please contact:

Alexia Quin
Director
info@musicastherapy.org

For broader advice and guidance please contact the data protection regulator:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Telephone: 0303 123 1113 (local rate) or 01625 545 745
Fax: 01625 524510
Website: <https://ico.org.uk/>

References

Health and Care Professions Council (2018). *Guidance on Confidentiality*
www.hcpc-uk.org

Last review: March 2021
Date of next review: March 2022