



## 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 project 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](mailto:info@musicastherapy.org). If you would like to update how you would like to hear from us, please use our online form that 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 project beneficiaries 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 GDPR consent form and/or signed up to our newsletter or volunteer mailing lists;
- those who set up a regular payment (see section ii);
- those we hold written or verbal contracts with, including Project Contributors; and
- 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 GDPR 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 (to know what type of information we might need - see further down the list on what information we generally collect from our contacts); and
- make sure all personal information is up to date, collected and stored safely and securely.

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 and Gift Aid Declarations
- 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](mailto: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 only thank the supporter for their donation and let them know how their contribution will help the charity's work, unless they have specifically requested that we do not do so. If the donor has opted in to receive communications from us, we will continue to send further information about the charity's activities.

### *All Contacts*

All contacts (including donors and other contacts) 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 to let us know their new preference by contacting [info@musicasterapy.org](mailto:info@musicasterapy.org). If contacts no longer want to receive communications sent through MailChimp, they can simply click on 'unsubscribe' at the bottom of the email to opt out. We will ensure all preferences are kept up to date.

We only contact our donors and other contacts by the means in which they have indicated.

### *Employment and Project Contributor Applicants*

Personal information pertaining to employment or volunteer applicants will be collected, processed and stored as needed for the purposes of recruitment. Any identification documentation provided to us by anyone who is recruited to undertake work for the charity is securely stored in the relevant project folder (this could be in electronic and/or paper format) for the duration of their involvement with us.

Applicants, employees, Project Contributors, and freelancers will not receive marketing communications or charity updates unless they have completed a GDPR consent form or signed up to our newsletter stating they would 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 Project Contributors if it is required for them to carry out their role and in compliance with this policy. We tell our Project Contributors that they are not allowed to store any personal information they have access to and use it in any other way than what we have requested. 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; and
- 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](mailto:info@musicasterapy.org). Contacts can also update their preferences contacting us in writing which can be sent in the post, or by unsubscribing if sent an electronic MailChimp communication.

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

**Alexia Quin**  
Director  
[info@musicasterapy.org](mailto:info@musicasterapy.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](http://www.hcpc-uk.org)

*Last review: April 2022*  
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