



Road Victims Trust

PRIVACY POLICY

Ratified: 24 March 2022

1. Introduction

1.1. Your privacy is a top priority for the Road Victims Trust (RVT). We are committed to protecting your personal information, handling it in a responsible manner, and securing it with industry standard administrative, technical and physical safeguards.

1.2. About us

1.2.1. The RVT is registered as a data controller with the Information Commissioner's Office [ICO registered number Z818731X](#).

1.2.2. The RVT is a registered charity ([registered charity number 1142336](#)) and also a Company Limited by Guarantee (registered number 7591489).

1.2.3. If you have any queries about this privacy notice or about any aspect of our data management, please contact our Data Protection Lead at enquiries@rvtrust.co.uk

1.2.4. We'll update this privacy notice regularly to ensure it continues to comply with the latest regulations and best practice. This privacy notice was last amended on 4th January 2022.

2. How we use your information

2.1. Storage and management of personal information

Our principal data management system is the Charitylog CRM system, which is maintained and developed by a third party processor. This system enables us to efficiently store any information about our clients, former clients and other stakeholders in a way that ensures adequate security and only allows people who have the right level of authority to access personal information. It also simplifies our responsibilities for data retention and subject access requests.

2.2. Visitors to our website and social media platforms

When someone visits our website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

Like most websites we use cookies to help the site work more efficiently.

2.3. Cookies

Cookies are small data files which are sent to your web browser and stored electronically. They act as your personal identity online. This information is used by us to track visitors to our website and to compile statistical reports on website activity. You can set your browser not to accept cookies and the following website tells you how to remove cookies from your browser: www.cookiesandyou.com.

2.4. What cookies are used on our websites?

2.4.1. Google Analytics

We use Google Analytics to track visitors to our website. For example, it allows us to view data on how many people are browsing the website on a mobile device so we can seek to improve their online browsing experience. Whilst Google Analytics allows us to track your progress through our site we are not able to track you directly – only that an unidentified user has accessed content.

Visit [Google's website](#) for information on opting out of services and changing your privacy settings.

2.4.2. Social media (Facebook and Twitter)

We use the sharing tools and widgets for the above social media platforms. These widgets give you the functionality to post, share and email content on the website to a friend. If you have a cookie stored already with one of the social media platforms (for example, if you're logged into Facebook) our website will recognise this, saving you the trouble of having to log in again.

2.5. Clients and former clients

2.5.1. The main legal basis we use for processing clients' and former clients' personal information is a combination of public task, contract and legitimate interest.

2.5.2. We carefully safeguard the information we hold about clients. This information comes to us, initially, via Police Referrals which are covered by a formal Information Sharing Agreement with the Collaborated Joint Protective Services function of Bedfordshire, Cambridgeshire and Hertfordshire Police Forces. We also receive self-referrals from members of the public.

2.5.3. Information may also come from clients' interactions with us, for example, opinions you provide on our website, comments or communication through our groups on social media, data you provide us with when completing forms.

What the information is used for?

2.5.4. This covers information that you have chosen to tell us directly yourself, or information that is supplied to us by another party. This may cover a wide range of scenarios, for example, you are receiving the services and support of the RVT or you are choosing to support us in some way. When you get in touch with us to make a donation, request information or support us in any other way, we may process the following types of personal information about you:

- Name
- Contact details (e.g. address, landline and mobile number, email address)
- Your interactions with the RVT. Examples of this being details of your donations and any donation history. This may also include your responses to our communications; information you've shared with us about why you have supported us; events, meetings and fundraising activities you've taken part in or shown an interest in

- Financial information
- The country you are in
- Date of birth
- Any preferences about your interests and how you like to be contacted.

2.5.5. Typically we do not ask you for sensitive personal data but there may be a clear reason for us to do so, examples being if you are receiving the support of our Counselling Services. This may include details of your mental health and any medications that you may be on. Such information will only be sought and recorded with your full consent. We may also ask for sensitive information about your health, for example, if you are participating in an event. You may also wish to share information about your health if you decide to speak out about your experiences of why and how you were introduced to the RVT. If you do, we will always treat information sensitively and ask you on every occasion if you are still willing to share it further in the form of case studies or media interviews.

Sharing your information

2.5.6. During your contact with us, we'll tell you how your information will be used and that it may be necessary to share it with other services and organisations.

2.5.7. We will not share your information with any third parties unless:

- you have consented to this (for example by providing information to us after we've told you that we will supply the information to a third party)
- it is as part of our duty to protect a child, a vulnerable adult, yourself or the public
- for the prevention and detection of a crime or the assessment of any tax or duty
- we are required to do so by any court of law or any relevant regulatory authority.

2.5.8. When people make complaints against our staff or volunteers, we hold data relating to the complainant as well as details of the complaint and witnesses or interested parties. We share information with panel members and external clerks who all sign data processor agreements with us. All data relating to this process is kept securely.

2.6. Members of the public who make enquiries or complaints

2.6.1. We may record or process data from members of the public who ring us with general enquiries, please refer to the section below about phone calls.

2.6.2. We retain general queries via email from the general public for a maximum of one year.

2.6.3. If a member of the general public contacts us to make a complaint about RVT business, we will need to record personal data (and often sensitive personal data) in order to investigate the complaint.

2.6.4. All complaints are dealt with in line with the RVT Complaints Policy and Procedure.

2.6.5. We try to meet the highest standards when collecting and using personal information, and we take any complaints about this very seriously. We encourage you to let us know if you think that our collection or use of information is unfair, misleading or inappropriate. We also welcome any suggestions for improving our procedures.

2.6.6. This privacy notice does not provide exhaustive details of all aspects of our collection and use of personal information. However, we're happy to provide any additional information or explanation needed. Please send any requests for this to our Data Protection Lead enquiries@rvtrust.co.uk.

2.6.7. If you want to make a complaint about the way we've processed your personal information, you can contact the ICO as the statutory body which oversees data protection law.

2.7. Job applicants, current and former staff, volunteers

2.7.1. We will only use any information you provide during the recruitment process for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

2.7.2. We will not share any information you provide during the process with any third parties for marketing purposes. The information you provide will be held securely by us or our data processors, whether the information is in electronic or physical format.

2.7.3. We may use third parties to help us find the right candidates. This includes Indeed and Charity Jobs.

2.7.4. We will use the contact details you provide to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you've applied for. You don't have to provide what we ask for, but it might affect your application if you don't.

2.7.5. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary (this is currently a six-month period for unsuccessful candidates).

2.7.6. If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff and their right to work in the UK, and to seek assurance as to their trustworthiness, integrity and reliability. Refer to the Government's [guidance on right to work checks](#).

2.7.7. Therefore, you must provide:

- proof of your identity – we'll ask you for original documents and will take copies
- proof of your qualifications – we may ask you for original documents and will take copies.

2.7.8. We will contact your referees, using the details you provide in your application, directly to obtain references.

2.7.9. If we make a final offer, we'll also ask you for the following:

- bank details – to process salary payments
- emergency contact details – so we know who to contact if you have an emergency at work.

- 2.7.10. If you accept a final offer from us, some of your personnel records will be held on our internal HR records system.
- 2.7.11. During your employment we may need to share your information with third party processors who provide elements of our ongoing employment service; that is employment law advice, occupational health advice and payroll and pensions processing.
- 2.7.12. If you are employed by us, relevant details about you will be provided to NEST who administer our pension scheme. You will be auto-enrolled into the pension and the details provided to NEST will be your name, date of birth, National Insurance number and salary.
- 2.7.13. If you volunteer for us in a counselling capacity there may be occasions where we are ethically bound by BACP guidelines to discuss your work with your course leader or other professional. All such cases will be formally discussed and documented.

3. Audit and regulatory requirements

3.1. We may share any data about our operations with:

- HMRC - see the [HMRC personal information charter](#)
- the Charity Commission - see the [Charity Commission personal information charter](#)
- the Information Commissioner's Office - see the [ICO privacy notice](#)
- Companies House - see the [Companies House personal information charter](#)

and other regulatory bodies, should this be necessary to complete our statutory audit and regulatory requirements.

4. Your rights

4.1. Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), you have rights as a data subject which you can exercise in relation to the information we hold about you. You can read more about these rights on the [ICO's website](#).

4.2. Access to your information

4.2.1. We try to be as open as we can in terms of giving people access to their personal information. You can find out if we hold any personal information about you by making a 'subject access request' under the UK GDPR. If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form.

4.2.2. If you agree, we'll try to deal with your request informally, for example, by providing you with the specific information you need over the telephone.

4.2.3. Please be aware that we may withhold information from you or provide you with redacted documents in line with exemptions in appropriate legislation.

4.3. **Records of treatment**

4.3.1. If you have received support from one of the RVT team (this includes Staff and Counselling Volunteers) and require access to information about the support you received you should contact enquiries@rvtrust.co.uk.

4.4. **Correcting mistakes**

4.4.1. You can ask us to correct any mistakes in any factual information we hold about you, such as your address, date of birth, contact details etc.

4.5. **Erasure**

4.5.1. The UK GDPR also gives you the right to have the data we hold about you deleted in some circumstances. This is called the 'right to erasure' or the 'right to be forgotten'.

4.5.2. The right applies in the following circumstances:

- we no longer need your data
- you originally provided consent and have now withdrawn consent
- you have objected to the use of your data and your interests outweigh ours
- we have collected your data unlawfully
- we have a legal obligation to erase your data.

4.6. **Making a request**

4.6.1. If you would like to exercise your above rights, please contact our Data Protection Lead at enquiries@rvtrust.co.uk with details of your request. Please note that details of your request, correspondence and a copy of any information disclosed will be held by RVT.

5. **Data security**

5.1. We recognise that the information you provide may be sensitive and we will respect your privacy. This means we store it securely and control who has access to it.

5.2. We're committed to holding all personal data within RVT on secure systems. We keep any paper-based personal data in locked cabinets to which only appropriate staff have access. We're working to reduce the amount of paper-based information we hold as it is easier to secure data if it is only held electronically. The majority of personal data is held electronically on our CRM system that is hosted by [Microsoft](#).

5.3. We use third-party processors to provide email monitoring and filtering.

Data breach notification

5.4. All personal data breaches must be reported immediately to the DPO.

- 5.5. If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the DPO will ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 5.6. In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the DPO will ensure that all affected data subjects are informed of the breach directly and without undue delay.
- 5.7. Data breach notifications shall include the following information:
 - 5.7.1. The categories and approximate number of data subjects concerned
 - 5.7.2. The categories and approximate number of personal data records concerned
 - 5.7.3. The name and contact details of the DPO (or other contact point where more information can be obtained)
 - 5.7.4. The likely consequences of the breach
 - 5.7.5. Details of the measures taken, or proposed to be taken, by the RVT to address the breach including, where appropriate, measures to mitigate its possible adverse effects.