



Rainbows Information Promise Data Privacy Statement

It's your data and your privacy

It's our responsibility to secure it

1. We are Cope Children's' Trust a company limited by Guarantee and a registered charity who operate as Rainbows Hospice for Children and Young People. We also have a trading subsidiary called Cope Marketing Limited.
2. As a responsible charity, we value the trust you place in us when you shared your personal data.
3. It is our promise to you that we will be open and honest about how we use the information you have entrusted with us.
4. We take very seriously the security of data you entrust us with. We keep your data in secure networks and servers, either at our hospice in Loughborough or in outsourced UK locations where we have appropriate agreements and security controls in place to keep your data secure. We also have manual archiving of information which we keep secure by physical controls over access.
5. We have policies and procedures to ensure data is not lost, accidentally destroyed, misused or disclosed.
6. We will use your personal information for the purpose for which you gave it to us and to administer and keep records of your relationship with us and provide you with other relevant information with regard to your relationship with the charity.
7. We only hold data which is relevant to your interaction with the charity and will only hold such data for as long as it is needed or required by law.
8. We will send you information about the charity, our activities and ways you can support us and will give you opportunities to choose what you receive and how you receive it.
9. We recognise your rights under the law and will always observe your request for access, amendment and removal of data.

10. We never sell to or share your data with third parties except that we may share such data for limited purposes as detailed later in this promise. When we do so we remain the data controller and ensure that your data is properly kept safe and only used in accordance with the law and our promise to you.
11. There are a few exceptional situations where we may have to breach confidentiality and pass on your details without your consent particularly in regards to safeguarding issues or if we are concerned that you are a danger to yourself or others.
12. We may share data between our charity and our subsidiary trading company but only as far as necessary to undertake your instructions.
13. The following pages give more specific details on different data we hold for different categories of individuals and how that data is used.
14. Your rights under GDPR are detailed here.
15. This information does not include extensive information for every aspect of how we collect data and use your personal information. For further clarification please [contact us](#) and we will be happy to help.
16. For information on our website cookies policy please visit the [cookies information page here](#)

General Policy and Promise

If you have any concerns please contact the Data Protection Team

[Supporters Data Protection](#)

[Our Families Data Protection](#)

[Staff/Volunteers Data Protection](#)

[Our Data Protection Team](#)

[Your rights](#)

1. If you support Rainbows or fundraise on our behalf the legal basis on which we hold and use your data is legitimate interest. This means that we will be in touch with you because we believe we have a legitimate interest in doing so and because it is something that you would expect to hear from us about. The basis on which we will communicate with you electronically is consent.
2. We will always be respectful of your rights to privacy and will always consider the total quantity of communications individuals will receive from you, and the current status of your relationship with us before communicating with you.
3. We will always respect your wishes and will always give you the option to opt out of some or all communications from us.
4. We will use data we hold to personalise the information on fundraising activities that we are undertaking.
5. We retain data only for as long as necessary and then we securely archive and destroy it.
6. We may disclose your personal data to partner organisations (a data processor) that fulfil operational requirements on our behalf - for example if we are using a mailing house or event organiser. We will always ensure we have appropriate control measures in place to secure your data whilst in their control.
7. We also need to disclose your data in respective Gift Aid claims to HMRC.

8. We may perform screening or profiling in respect of you as a donor for the purpose of personalising the material we may send to you.
9. We may use your data for statistical analysis of our donors in general for internal purposes of management and developing our activities.
10. We may also collect data about you from third party fundraising sites such as Just Giving or Facebook. You should make sure you are comfortable with their information policy when using their website which is not our responsibility.
11. We may use third parties to process your data for us in regards to the above relationship but we remain the data controller and will ensure all data is kept safely and is dealt with in accordance with the law and our promise.
12. Our commitment to you is that we will:
 - Never sell your data
 - Always keep your data secure
 - Only send you material that is of potential interest to you,
 - Give you the option to not receive further communications,
 - Ensure our marketing is controlled and proportionate to ensure supporters do not feel overwhelmed,
 - Respect your data and your wishes.

Supporter Data Policy and Promise

If you have any concerns about our use of data then please contact the Data Protection Team

[Supporters Data Protection](#)

[Our Families Data Protection](#)

[Staff/Volunteers Data Protection](#)

[Our Data Protection Team](#)

[Your rights](#)

Families and CYP Policy and Promise

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[Supporters Data Protection](#)

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[Your rights](#)

1. If you are an existing family using the services provided by Rainbows, the basis on which we hold and process your data is Legitimate Interest.
2. Legitimate Interest is used on the basis that the data we hold has been provided to us on referral by either the family of the child or young person or a professional associated with their care who have completed a referral form and submitted to the hospice.
3. Post 25 May 2018, we will continue to use Legitimate Interest upon referral but will obtain consent on the child or young person being accepted by the hospice.
4. We recognise the data includes sensitive personal data concerning the children, young people and families who use the charity's services and this is held under condition H in article 9 (2) of the GDPR.
5. Where we have consent from the family of the child or young person we shall use the legal basis of consent to process all data in accordance with the instructions given at the time the consent was given to us.
6. We store data electronically and in manual form which is always kept under restricted access and securely in both environments.
7. We only share data with other parts of our organisation (for example our Supporter Relations team or subsidiary trading company) with your specific consent.
8. We will request your specific consent before sharing your information or story with our marketing team or external bodies and will consult you about how it is to be shared.
9. We will only share your data with other healthcare professionals or healthcare organisations with your

express consent and will then only share on a need to know basis. Internally, information will be shared with individuals concerned in your care or our support teams on a strict need to know basis.

10. We may be required to share your data with some of the Clinical Care Commissioning Groups that assist by providing funding for the hospice.
11. With regard to consent this may be withdrawn at any time subject to the fact that the sensitive personal data of the children and young people we are caring for needs to be shared with medical and clinical professionals the hospice and the teams in the community who look after the child or young person.
12. We do not perform screening or profiling in respect of you as a beneficiary but your data may be utilised for statistical analysis of the beneficiaries in general, for internal purposes of management and developing our activities.
13. We will hold data for a minimum of 8 years and maximum of 25 years depending on the individual circumstances as they constitute healthcare records.
14. Our promise to you is that we will:
 - Never sell your data
 - Always keep your data secure,
 - Only use it for the purpose we hold it, unless we have your consent to do otherwise,
 - Only share it for your benefit.

1. If you are an existing employee, applicant or volunteer, the legal basis on which we hold and process your data is Legitimate Interest, on the basis that you have provided the data for us to process in respect of your volunteering or employment and we both have an interest in processing that data in relation to this.
2. Legitimate Interest will last as long as your service with us.
3. If you join us after 25 May 2018, the legal basis will be consent, which we will obtain at the time of your application. This will allow us to process the information if your application is successful.
4. If you apply for a role at Rainbows, we will use the information we collect from you to process your application. We will also use it to communicate with you regarding the application, validate any information collected, validate your entitlement to work/volunteer in the UK and, if necessary, assess disability access requirements. Finally, we will use your information to monitor recruitment statistics and exercise specific rights or obligations with regards to the position or you as an applicant.
5. Information we collect from employees and volunteers enables us to maintain accurate records of our relationship, communicate with you, process payments required, monitor employment statistics, carry out our obligations and exercise rights in relation to employment/volunteering.
6. We may need to request access to records of criminal convictions and offences if necessary for

your employment/volunteering.

7. Your data may be shared internally for the purposes of managing the recruitment process or managing your employment or volunteering with us.
8. Your data will only be shared with other organisations as necessary to check your application once you have been offered a position and to process your information for Rainbows benefits and employment taxes.
9. We are obliged to share the following information with third parties:
 - Personal and financial information with regard to payroll and pensions management.
 - Personal information with professional bodies and regulators
 - Payroll information with HMRC
10. We will only use your data for the purposes outlined and will only contact you using that data for the purposes outlined.
11. We will obtain your consent to use your data for any other purpose.
12. Data will be held for the following periods
 - Unsuccessful applicants – up to six months after the recruitment process is completed and then securely destroyed
 - Successful applicants – six years after the completion of your service

Staff and Volunteers Policy and Promise

If you have any concerns about our use of data then please contact the Data Protection Team

[Supporters Data Protection](#)

[Our Families Data Protection](#)

[Staff/Volunteers Data Protection](#)

[Our Data Protection Team](#)

[Your rights](#)

To update or correct the data we hold please contact the appropriate departments as below:

Relationship	Phone	Email
Donor/Shop customer	01509 638049	supportercare@rainbows.co.uk
Family in care of the hospice		careteam@rainbows.co.uk
Employee/volunteer	01509 283903	jobs@rainbows.co.uk
Other		dataprotection@rainbows.co.uk

To request access to the data we hold about you or to raise a complaint about our use or retention of data, contact either the Data Protection Officer, Caldicott Guardian or Senior Information Risk Owner.

Office	Senior Information Risk Owner	Caldicott Guardian	Data Protection Officer
Name/ Role	Glyn Rees-Jones Director of Business Resources	Julie Taylor Executive Nurse	Rebecca Scrace Finance and Compliance Manager
Phone	01509 638040	01509 638038	01509 638069
Email	ronald.graham@rainbows.co.uk	Julie.taylor@rainbows.co.uk	rebecca.scrace@rainbows.co.uk

Or write to us at the Data Protection Office at Rainbows Hospice, Lark Rise, Loughborough, LE11 2HS

Contacting us about the data we hold

[Supporters
Data Protection](#)

[Our Families
Data Protection](#)

[Staff/Volunteers
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[Our Data
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[Your rights](#)

Your rights

Right to be	Explanation
Informed	Our communications with you will include GDPR information and explain your options. The publication of this notice also provides clear and transparent information on the data we hold about you as a data subject
Access	You can request a copy of any data we hold about you
Rectification	You can request we correct any incorrect data we hold about you
Forgotten	In certain circumstances you can ask for your data to be erased from our records
Restriction of processing	When certain conditions apply you can restrict processing of your data
Portability	You can have information transferred from us to another organisation
Object to processing.	You have the right to object to certain forms of processing including direct marketing
Object to automated decision making.	You have the right to object to decisions being made about you solely made by system or technology

If you feel that we have not observed your rights or you have concerns about our use of data, please contact us to discuss the matter.

You have the right to register your concern with the UK Information Commissioners office. You can find the details on their website ico.org.uk

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