

Privacy – Policy and Procedure

Our Vision

We will not give up until everyone experiencing a mental health problem gets both support and respect. Swindon and Gloucestershire Mind creates services where people are recognised, valued and supported.

Our Mission

Swindon and Gloucestershire Mind provide advice and support to empower anyone in our local communities experiencing a mental health problem. We campaign to improve services, raise awareness and promote understanding.

Our Values

- **Selflessness**
We will act in the best interests of the people we support.
- **Integrity**
We will be principled in our work.
- **Objectivity**
We will act and take decisions impartially and fairly, without discrimination or bias.
- **Accountability**
We will take responsibility for what we do and how we do it.
- **Openness**
We will work and take decisions in an open and transparent manner.
- **Honesty**
We will be truthful and reliable.
- **Leadership**
We will model Swindon & Gloucestershire Minds values and lead by example in demonstrating organisational behaviours.

1. Introduction

Swindon & Gloucestershire Mind (“S&G Mind”, “we”, “us”) is committed to protecting and respecting your privacy. We take great care to ensure that your personal information is handled securely and in accordance with UK data-protection legislation, including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

This Privacy Policy explains how we collect, use, store, and protect your personal data when you engage with our services, visit our website, donate, volunteer, work with us, or interact with us in any capacity.

We encourage you to read this policy carefully to understand our practices regarding your personal information.

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2. Who We Are

Swindon & Gloucestershire Mind is a registered charity providing mental health support services, information, campaigns, and community programmes.

Data Controller: Swindon & Gloucestershire Mind

Address: S&G Mind, Sanford House, Sanford Street, Swindon, SN1 1HE

Email: dpo@sgmind.org.uk

Telephone: 01793 547150

We are registered with the Information Commissioner's Office (ICO).

3. What Personal Data We Collect

We may collect the following types of personal information:

3.1 Information You Provide Directly:

- Name, address, contact details.
- Date of birth.
- Emergency-contact information.
- Information relating to your mental health or support needs.
- Records of your communication with us.
- Application details if you volunteer or apply for employment

3.2 Special Category Data

Where relevant, with your explicit consent or under other lawful conditions, we may process:

- Health information.
- Demographic information (e.g., ethnicity, gender, sexuality, disability) used solely for support, safeguarding, or equality monitoring.

3.3 Information Collected Automatically:

- Website usage data (cookies, analytics).
- IP address and device information.

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3.4 Information from Third Parties

We may receive information from:

- Referral partners.
- Health or social-care providers (with your consent).
- Funding bodies.
- Volunteering or employment references.

4. How We Use Your Personal Data

We will only use your information where we have a lawful basis to do so. These may include:

- Providing support services and maintaining accurate records.
- Safeguarding and protecting individuals at risk.
- Managing referrals and service delivery.
- Recruitment and HR administration.
- Handling donations and fundraising activity.
- Monitoring equality, performance and service improvements.
- Marketing and communications (where consent is given).
- Meeting legal and regulatory requirements

5. Our Lawful Bases for Processing

Depending on the activity, we rely on one or more of the following legal bases:

- Consent
- Legitimate Interests
- Performance of a Contract
- Vital Interests
- Legal Obligation
- Public Task (where applicable through commissioning)

Where Special Category Data is involved, we rely on conditions including your explicit consent, the provision of health or social care, or reasons of substantial public interest.

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6. Use of Artificial Intelligence (AI)

S&G Mind makes limited use of Artificial Intelligence (AI) tools to support internal operational tasks such as document drafting, workflow support, anonymised analytics, and marketing material development.

We operate AI under the following commitments:

6.1 No Personal Data Processing

We do not process or input personal data of people accessing services, staff, volunteers, donors, or partners into AI systems.

AI is never used for:

- Advice, counselling, or support provision.
- Decision-making about eligibility, risk, or care.
- Profiling individuals.

6.2 Governance and Oversight

Our Acceptable Use of AI Policy governs how AI can be used. Any future AI implementation that may involve personal data will undergo:

- A completed Data Protection Impact Assessment (DPIA).
- Senior Leadership Team and Board-level approval.
- Full transparency to affected individuals.

6.3 Policy Updates

If our use of AI changes, this Privacy Policy will be updated to clearly explain:

- What personal data is processed.
- The lawful basis.
- Individuals' rights.
- Safeguards and retention practices.

This ensures our continued compliance with data-protection principles, including lawfulness, fairness, transparency, data minimisation, and accountability.

7. Sharing Your Information

We will only share your data when necessary, appropriate, and lawful. Examples include:

- With referral partners or health professionals (with your consent or where required for your safety).
- With funders for monitoring and evaluation (usually anonymised).
- With regulators or authorities where legally required.
- With trusted IT or administrative providers under strict confidentiality agreements.

We do not sell or trade personal data.

8. International Transfers

S&G Mind stores all personal data on UK-based servers, and our core systems are hosted within the UK to ensure strong data-protection safeguards.

We do not routinely transfer personal data outside the UK.

If, in exceptional circumstances, any processing outside the UK were to occur (for example, via a third-party service provider), we would ensure that appropriate legal safeguards are in place, such as UK International Data Transfer Agreements (IDTAs), Standard Contractual Clauses, or an adequacy decision, to protect your information to UK GDPR standards.

9. Data Retention

We keep personal information only for as long as necessary for the purpose for which it was collected, following our retention schedules and legal obligations.

When no longer required, your information is securely deleted or anonymised.

10. Your Rights

You have the following rights under UK GDPR:

- Right to be informed.
- Right of access (Subject Access Request).
- Right to rectification.
- Right to erasure (“right to be forgotten”).
- Right to restrict processing.
- Right to data portability.
- Right to object.
- Rights regarding automated decision-making and profiling

To exercise your rights, contact us using the details above.

11. How We Protect Your Information

We use administrative, technical, and physical safeguards to protect your personal data, including:

- Access controls.
- Staff training.
- Encryption and secure systems.
- Regular reviews and audits.
- Compliance with NHS Data Security & Protection Toolkit (DSPT) where applicable.

12. Cookies and Website Use

Our website uses cookies to improve your experience. Cookie preferences can be managed through your browser settings. Full details are available in our Cookie Policy.

13. Complaints

If you have concerns about how we use your data, please contact us in the first instance:

Data Protection Officer
Swindon & Gloucestershire Mind
dpo@sgmind.org.uk

You also have the right to complain to the ICO:
www.ico.org.uk

14. Updates to This Policy

We may update this Privacy Policy from time to time. Any changes will be published on our website with a revised effective date.