

Pharmacist Support privacy notice

Pharmacist Support is an independent charity supporting pharmacists, former pharmacists and their families, Mpharm students and pre-registration trainees.

Unless otherwise stated, Pharmacist Support is the data controller for the information we collect.

The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We do not share data with anyone else without your permission, except when we believe it is the only way to prevent harm to you or other people. If we do disclose information without your permission, this is authorised by a senior member of staff and we will explain our reason to you at the earliest opportunity.

We require all third parties who provide services for us and who process the data of our service users to comply fully with data protection legislation.

We will not share any of the information you provide with any third parties for marketing purposes.

It is charity policy to respect the right of service users, staff, trustees, volunteers and others whose personal data we hold to privacy and confidentiality as far as possible within the constraints of legal requirements, including legislation on the safeguarding of adults and children and on the prevention of terrorism.

We will not store any of your information outside of the European Economic Area.

Data is kept in accordance with our retention schedules as set out in the appropriate sections of this notice.

This privacy notice tells you what to expect when Pharmacist Support collects personal information. More detailed information is set out below for:-

- People who use our enquiry services
- People who apply to us for financial assistance
- People who apply for a Pharmacist Support bursary
- People we refer for specialist advice
- People who contact our addiction support service
- People we refer for careers coaching
- People who use our pilot coaching service
- People who attend a wellbeing workshop
- People who received counselling from our in-house counsellor (service ended 2016)
- People who received support with e-therapy from our in-house counsellor (service ended 2016)
- People who sign up to our general or fundraising e-newsletters

- People who sign up to receive direct communications about fundraising
- Visitors to our website
- People who complete one of our feedback surveys
- People who contact us via social media
- People who email us
- People who donate to us
- People who have pledged to leave a legacy
- People who make a complaint to us
- Job applicants
- Current and former Pharmacist Support employees
- Volunteer applicants and our current and former volunteers
- Trustees

How to opt out of receiving information from Pharmacist Support

An individual who wishes to opt out of receiving one of our e-newsletters can use the link in that newsletter or can email us at:-

marketing@pharmacistsupport.org

or telephone us on 0808 168 2233.

We will remove them from our circulation list straightaway.

People who use our enquiry service

When someone makes an enquiry by telephone, email, Live Chat, in-person or any other route we record their contact details on our customer relationship database if they provide them to us and brief details of the enquiry and our response. We use this information to be able to respond to the request for help and to be able to monitor the quality of the service and ensure its efficiency and effectiveness. We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for feedback on the way their application has been dealt with and on the impact of our service.

People can choose not to give us their contact details, in which case we record the enquiry as an anonymous enquirer.

Someone can request a transcript of their LiveChat session on provision of their email address.

Enquirers' contact details will be retained for three full financial years following the year of last contact with the enquirer. We are working towards anonymising the record after this period so that we retain a statistical record of the service.

People who apply to us for financial assistance

We have to hold the details of the people who apply to us for financial assistance in order to be able to assess the application and provide the service. These details include case notes, documentation to evidence the applicant's financial circumstances and support their application and bank account details in order to make payments. We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for

feedback on the way their application has been dealt with and on the impact of our service.

Case notes, which include a record of approval of financial assistance, will be retained for six full financial years following the financial year of the last payment. Other documentation provided to support the application will be retained for one full financial year following the financial year of date of last payment. For unsuccessful applicants, details will be retained for one full financial year. After these retention periods, the data will be deleted or where a statistical record of the service is required, anonymised.

See also the *Financial transactions* section in this policy for information on retention of payment details.

People who apply for a Pharmacist Support bursary

We have to hold the details of the people who apply to us for a Pharmacist Support bursary in order to be able to provide the bursary scheme and assess the applications. These details include an application form, documentation to evidence the applicant's financial circumstances and, for successful applicants, bank account details in order to make the payment. We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for feedback on the way their application has been dealt with and on the impact of our service.

We keep the contact details of successful applicants who agree to publicity in order to maintain contact with them. The application forms, supporting documentation and record of approval of financial assistance for successful applicants are retained for six full financial years following the year in which the last payment was made and of unsuccessful applicants for one full financial year after the year in which the decision was made. After this, the data will be deleted or, where a statistical record of the service is required, anonymised

See also the *Financial transactions* section in this policy for information on retention of payment details.

People we refer for specialist advice

We have to hold the details of people who ask to be referred for specialist advice in order to provide this service. The advice is provided by Manchester Citizens Advice and the contact details and brief details of the reason for the advice request are shared with the adviser in order that they can contact the client and deal with their query. From 2018, referrals are managed and recorded using a secure database that both Pharmacist Support and Manchester Citizens Advice can access. We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for feedback on the way their application has been dealt with and on the impact of our service.

We are contacted by the adviser once they have been in touch with the client, with confirmation of the date of contact and very brief details of the advice given. Once the case is closed, the adviser notifies us of the outcome and any actual or potential

financial gain. A record of this is kept for monitoring and quality assurance of the service.

The details of referrals made from 2018 will be retained for six years on the secure database accessed by both Pharmacist Support and Manchester Citizens Advice. Referrals made before this and recorded by Pharmacist Support will be kept for three full financial years following the year when the case is closed. After this, they will be deleted or anonymised where a statistical record of the service is required.

People who use our Listening Friends service

When someone contacts us and asks for and is allocated a Listening Friend, we record the contact details they provide to us (See *People who use our enquiry service* above). A first name and contact telephone number is passed to the volunteer in order that they can contact the client. The volunteer records an anonymous summary on a database managed by Pharmacist Support along with demographic data where this is known, to enable the charity to monitor access to the service and for quality assurance purposes.

People who contact our addiction support service

When someone contacts our addiction service, we record their contact details if they provide them to us. Where applicable, we will offer a referral to our specialist addiction therapist from Outcome Consulting and, where this offer is taken up, we will email their contact details and reasons for the referral to the therapist in a document with password encryption.

Where a client is being supported by the therapist, we receive brief written or verbal status updates which are recorded for monitoring and quality assurance purposes.

Where a client applies for help with treatment costs, more detailed reports to support the application are prepared by the therapist for the charity and are retained – see the Financial assistance section for further information on how applicants' details are dealt with.

We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask the person for feedback on the way their application has been dealt with and on the impact of our service.

Where a service involving financial assistance or payment for service from our counsellor is provided, these details will be retained for six full financial years following the year in which the final payment was made. Otherwise, data will be retained for one full financial year from the year when last contact with the client was made. Any active recovery capital assessment reports will be kept for three years from the final assessment. After this, data will be deleted or where a statistical record of the service is required, anonymised.

People we refer for careers coaching

We have to hold the details of people who ask to be referred for careers coaching in order to provide this service. The advice is provided by an external provider (either Renovo, Training Tube or Chiumento) and the client's contact details and expression of interest are shared with the provider in a document with password encryption in

order that they can contact the client and provide the service. We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for feedback on the way their application has been dealt with and on the impact of our service.

These details will be retained for two full financial years following the year in which the coaching was completed. After this, they will be deleted or where a statistical record of the service is required, anonymised.

People who use our pilot coaching service

We have to hold the details of the people who apply to us for coaching sessions in order to be able to assess the application and provide the service. These details include an application form, a coaching agreement and case notes. We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for feedback on the way the sessions were delivered and on the impact of our service.

These details will be retained for two full financial years following the year in which the coaching was completed. After this, they will be deleted or where a statistical record of the service is required, anonymised.

People who attend a wellbeing workshop

We hold the details of people who attend our wellbeing workshops and who give us their contact details in order that we can provide follow up services to them, including follow up wellbeing emails, course notes and an attendance certificate.

In addition attendees may sign up to receive our e-newsletter (see separate section).

We only use these details to provide the service the person has requested and for other closely related purposes, for example, to ask them for feedback on the workshop and on the impact of our service.

These details will be retained while we provide follow up services, for up to 12 months.

People who received counselling from our in-house counsellor (service ended 2016)

The assessments and counsellor's case notes of counselling sessions are kept securely electronically. The assessments will be kept until the end of the counselling and the notes will be kept for seven years from the end of the counselling. After this, they will be deleted or, where a statistical record of the service is required, anonymised.

People who received support with e-therapy from our in-house counsellor (service ended 2016)

The assessments and counsellor's case notes of support provided to e-therapy users are kept securely electronically. The assessments will be kept until the end of the counselling and the notes will be kept for seven years from the end of the e-therapy. After this, they will be deleted or, where a statistical record of the service is required, anonymised.

People who sign up to our general or fundraising e-newsletters

We only send e-newsletters to people who have opted in to receive them. We have to hold the details of these people in order to provide the service. However, we only use these details to provide the e-newsletters. Subscribers can unsubscribe at any time and are given an easy way of doing this.

We use a third party provider, MailChimp to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see <https://mailchimp.com/legal/privacy/>

People who sign up to receive direct communications about fundraising

We only send our direct fundraising communications to people who have opted in to receive them. We have to hold the details of these people in order to provide this information. We will only send you information you have opted in to receive. Subscribers can unsubscribe at any time and are given an easy way of doing this.

Visitors to our website

When someone visits www.pharmacistsupport.org 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 which helps us to tailor our services to the needs of our stakeholders. Further information on Google's data privacy and security information is available on the Google website:-

https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008

People who complete one of our feedback surveys

We use a third party tool, Survey Monkey, to seek feedback from users about their experience of our services. We use this information to monitor the quality of our services and to provide people with the opportunity to give us their feedback and suggestions on service developments/improvements. We will use the information only in ways that will not identify anyone. Respondents are given the option of providing their contact details if they wish to subscribe to e-news, provide a case study or would like the charity to contact them regarding some feedback they have given. Contact details will only be used for the purpose stated.

People who contact us via social media

We use a third party provider, Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. We will not share this information with any other organisations.

People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

People who donate to us

We will contact donors who provide their contact details either directly to us or via a third party platform to acknowledge the donation and express our thanks to the donor. This contact will include an invitation to opt-in to further specified information from the charity. Thereafter, we will only send information to people who have opted in to receive it. We only use these details to provide the agreed information. Subscribers can unsubscribe at any time and are given an easy way of doing this.

See also the *Financial transactions* section in this policy.

People who have pledged a legacy

Where a person has pledged a legacy to the charity, this will be recorded and the data held securely, for future reference.

People who make a complaint to us

In the event of receiving a complaint, in accordance with our complaints policy we will record the details of the complaint and complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint.

If the complaint was about an individual we may have to disclose the complainant's identity to them, where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying her or him to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Personal information contained in complaint files will be kept for two years from the complaint being closed.

Job applicants

We will only use the information provided during the recruitment process for the purpose of progressing job applications, or to fulfil legal or regulatory requirements.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information (ie skills, knowledge and experience, education and referees), you provide to assess your suitability for the role for which you have applied.

You will also be asked to complete an anonymous equalities monitoring form. Completion of the form is optional. Data provided will be used only to produce and monitor equal opportunities statistics.

The charity personnel who shortlist applications for interview will not be provided with your name or contact details. If selected for interview you may be asked to complete a written test and we will take interview notes.

We will retain information generated throughout the assessment process, for example interview notes, for 6 months following the closure of the recruitment.

We will retain the information provided by unsuccessful applicants for 6 months from the closure of the recruitment.

Current and former Pharmacist Support employees

For applicants offered a post, this will be subject to satisfactory checks ie references, evidence of qualifications and right to work in the UK, a criminal records declaration and records will be kept of this in the member of staff's HR file. We will also retain bank details, in order to process salary and expenses payments, contact details for the staff member and emergency contact details of who to contact should there be an emergency at work.

Senior managers are required annually to declare if they have any potential conflicts of interest. This information will be held on their HR file.

Relevant details about you will be provided to Pharmacist Support's payroll provider. This will include your name, bank details, address, date of birth, National Insurance Number, salary, benefits and deductions for loans and similar. They also receive copies of tax coding notices and any legal notices sent to us as your employer in order to comply with legal and tax obligations to make appropriate deductions from pay.

You will be auto-enrolled into Pharmacist Support's pension scheme and your relevant details (date of birth, address, national Insurance number and salary) will be provided to the administrators of the Pharmacist Support pension scheme. Details of contributions made to the pension scheme will be retained for 6 full financial years following the end of the financial year in which they are paid.

Details of the current payroll provider, pensions administrator and HMRC tax office are included in the staff handbook.

We will retain the information provided by successful applicants for the duration of their employment. We will also retain information relating to annual appraisals, performance management, grievance and disciplinary issues and sickness certification. This information is destroyed after 6 complete financial years following the financial year in which employment ended. Notes of 1:1 meetings recorded by the staff member's manager will be destroyed when the staff member leaves unless there is an unresolved ongoing issue. In this case the notes will be destroyed once the issue is resolved.

Volunteer applicants and our current and former volunteers

We will only use the information provided during the volunteer recruitment process for the purpose of progressing applications, or to fulfil legal or regulatory requirements.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information (ie skills, knowledge and experience, education and referees), you provide to assess your suitability for the volunteer role for which you have applied.

You will also be asked to complete an anonymous equalities monitoring form. Completion of the form is optional. Data provided will be used only to produce and monitor equal opportunities statistics.

The charity personnel who shortlist applications for interview will not be provided with your name or contact details. If selected for interview you may be asked to complete a written test and we will take interview notes.

For applicants offered a volunteer role, this will be subject to satisfactory checks ie references, evidence of qualifications, and DBS checks where required. For some roles a criminal records declaration may be requested and records will be kept of this. We will also retain bank details, in order to process expenses payments, contact details for the volunteer and emergency contact details of who to contact should there be an emergency whilst carrying out their volunteer role.

All volunteers are required annually to declare if they have any potential conflicts of interest. This information will be held by the charity.

We will retain the information provided by those who take up a volunteer role for the duration of their volunteering for Pharmacist Support plus 6 years from the date of them ceasing to be a volunteer. Notes of 1:1 meetings recorded by the staff member's manager will be destroyed when the staff member leaves unless there is an unresolved ongoing issue. In this case the notes will be destroyed once the issue is resolved.

See also the *Financial transactions* section in this policy.

We will retain the information provided by unsuccessful applicants for 6 months from the closure of the recruitment.

We will retain information generated throughout the assessment process, for example interview notes, for six months following the closure of the recruitment.

Our trustees

We will only use the information provided during the trustee recruitment process for the purpose of progressing applications, or to fulfil legal or regulatory requirements.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information (ie skills, knowledge and experience, education and referees), you provide to assess your suitability for the trustee role for which you have applied.

You will also be asked to complete an anonymous equalities monitoring form. Completion of the form is optional. Data provided will be used only to produce and monitor equal opportunities statistics.

The panel who shortlist applications for interview will not be provided with your name or contact details. If selected for interview you may be asked to complete a written test and we will take interview notes.

For applicants offered a trustee role, this will be subject to satisfactory checks ie references, a criminal records declaration, anti-money laundering vetting, meeting any requirements set out in the Memorandum and Articles, a board resolution to appoint, and a declaration of your acceptance of the position and that you meet the stated requirements and are willing to act as a trustee. Records will be kept of this. We will also retain bank details, in order to process expenses payments, contact details for the trustee and emergency contact details of who to contact should there be an emergency whilst carrying out their trustee role.

The charity will record identity details for any period while you are acting as a signatory on a bank mandate or similar for the charity.

In order to meet with legal requirements, personal and other details will be disclosed to the Charity Commission and Companies House. We will also provide details to the charity's investment managers, bankers, auditors and other advisers, as required to enter into contracts and manage the charity's affairs.

All trustees are required to complete an annual declaration of interest and to declare at each board meeting any potential conflicts of interest. This information will be held by the charity.

We will retain the information provided by those who take up a trustee role for the duration of their trusteeship for Pharmacist Support plus six full financial years following the date of them ceasing to be a trustee.

We will retain the information provided by unsuccessful applicants for 6 months from the closure of the recruitment.

We will retain information generated throughout the assessment process, for example interview notes, for 6 months following the closure of the recruitment.

See also the *Financial transactions* section in this policy.

Financial transactions

Except where noted separately in this policy, we are required by law to retain details of any financial transaction with Pharmacist Support for a maximum period of seven years following the transaction date. This includes donations received from individuals or corporations, income generated from customers, and payments made to suppliers, recipients of financial support or bursaries, volunteers, trustees and staff.

Details retained may include name, address, amounts paid or received, gift aid declarations, copy invoices. Where a donation has been made via a third party platform such as CAF, Just Giving, VirginMoney Giving, Paypal etc we only receive the information you permit the platform to share with us. Please refer to the privacy policy of the relevant platform for further information.

Bank account details are retained for the purposes of making payments only and once added to our online banking portal at Lloyds Bank Plc are not retained on our

database. Our online banking system meets with current security standards. Access to online banking is restricted to persons authorised to make payments only.

We only retain the minimum details required to meet our legal and contractual obligations. Bank account details are deleted from our banking system when there is no longer a need to retain them. For example, if we end a contract, a person no longer works or volunteers for the charity or it is agreed that financial assistance is no longer required.

Financial information (including copy bank statements) provided as part of an application for financial assistance or a bursary is retained as part of the case notes as documented in those sections of this policy.

Supplier and customer contact details may be held on our financial systems hosted by Intuit. Data on this system is backed up and stored in data centres based in the USA. Intuit is a certified member of the EU-US Privacy Shield scheme which approves the mechanisms under which such data transfers are made. For information about about the Privacy Shield principles, please visit www.Privacyshield.gov.

Data protection

The Information Commissioner's Office (ICO) was set up to uphold information rights. Full information on these rights and how to exercise them is available on its website <https://ico.org.uk/>

Pharmacist Support is happy to provide any additional information or explanation needed regarding our collection and use of your data. Any requests for this, including information on accessing personal information can be emailed to us at: info@pharmacistsupport.org

If you wish to complain about the way we have processed your personal information, please contact us via any of these routes:

Telephone: 0808 168 2233

Email: info@pharmacistsupport.org

Post: Pharmacist Support, 5th Floor, 196 Deansgate, Manchester M3 3WF

The Information Commissioner's Office (ICO) oversees data protection law and complaints can be made to them at www.ico.org.uk/concerns