



# Independent Custody Visiting Association

## Privacy Policy

- Policy Prepared by: Company Secretary
- Approved by ICVA Board on:
- Policy became operational on: 02.06.21
- Policy review date: 02.06.23

### Introduction

The Independent Custody Visiting Association (ICVA) is a not for profit company limited by guarantee, incorporated in England and Wales, registered office at Edwards and Keeping, Unity Chambers, 34 High East Street, Dorchester, Dorset, DT1 1HA.

As a human rights organisation under the NPM (National Preventative Mechanism), ICVA takes your privacy very seriously. This policy sets out all of the steps that we take to safeguard your information, how we collect it, store it and how we use it, in order to comply with the Data Protection Act 1998.

The Data Protection Act 1998 applies to organisations holding information about living individuals in electronic format and, in some cases, on paper. They must follow the eight data protection principles of good information handling. These state that personal information must be:

1. fairly and lawfully processed
2. processed for specified purposes only
3. adequate, relevant and not excessive
4. accurate and, where necessary, kept up to date
5. not retained for longer than is necessary
6. processed in line with the rights of the individual
7. kept secure
8. not transferred to countries outside the European Economic Area unless the information is adequately protected

This data protection policy ensures that ICVA:

- ✓ Complies with data protection law and follows good practice
- ✓ Protects the rights of staff, customers and partners
- ✓ Is open and transparent about the way that it stores information about customers, suppliers and business contacts
- ✓ Is protected from the risks of committing a breach of the Data Protection Act 1998

We may need to gather and use certain information about customers, suppliers, business associates, employees and other people that we might need to contact.

## **What kind of information does ICVA collect and retain?**

ICVA currently holds the email addresses of:

- Independent custody visitor scheme managers and staff from the offices of Police and Crime Commissioners (work email addresses only).
- Independent custody visitors' personal email addresses for registering for events and subsequent feedback surveys if no work email address is available via their OPCC or police force.
- Interested parties for the purpose of receiving newsletters.

ICVA retains no address details or financial information with regard to our members or independent custody visitors, other than remittance advice, post invoice. ICVA ensures that it attains consent from all of those whose email addresses are collected for the above purposes.

## **Personal data held for the purpose of personnel management.**

For the employees and the Treasurer of ICVA, the following information is held:

- Home address
- Next of Kin
- Emergency Contact
- Telephone numbers
- Payroll information

For Directors, the Chair and Vice Chair of the ICVA Board, the following information is held:

- Work email addresses or personal email addresses where preferred for each director.
- Directors' addresses are registered with Companies House as that of the ICVA company office.
- Personal details and address details of Directors are retained for the purpose of complying with Companies House only and are stored in a secure Dropbox account and will not be disclosed for public view.

## **Storage and management of data files.**

All data will be stored in a secure Dropbox account and access to data files will be strictly supervised by the ICVA Chief Executive Officer and Chief Operating Officer.

Data will be retained for a period of six years, after which it will be deleted.

## **For what purposes will your data be processed?**

If you are accessing our website for advice and information, your data will be used only for this purpose. If you are signing up to an event, we will contact you about this specific event. If you are applying for a role with ICVA, we will retain your data only for these purposes and will let you know if a third party, such as a recruitment agency, is assisting and has access to your data.

## **Sharing personal data with third parties.**

We do not disclose your personal data to anyone outside ICVA.

## **Your rights and how to contact us.**

If you have comments, questions or requests regarding our processing of your personal data, please contact [www.icva.org.uk](http://www.icva.org.uk) or put your complaint in writing and send to us at ICVA, PO Box 39322, Dorchester, Dorset, DT1 9HW.

## **Complaints procedure.**

ICVA operates a two-stage complaints handling process. If you wish to make a formal complaint regarding data, please contact ICVA in the first instance for local resolution. ICVA will respond to your communication within 10 days (you have the right to withdraw your complaint at any time).

If you are still not satisfied with the outcome of the ICVA local resolution, you are advised to contact the Information Commissioner's Office.

For information on how to make the application to the Information Commissioner please visit their website at [www.ico.gov.uk/complaints.aspx](http://www.ico.gov.uk/complaints.aspx). Alternatively, phone or write to:

First Contact Team  
Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF  
Tel: 0303 123 1113

## **Anonymous Data.**

You can access information on our website without telling us who you are and without revealing any personal information.

We may collect some information when you visit our site but this does not allow us to identify you personally. The information we collect includes the browsers that visitors use, the time that they visit and which pages are most viewed. This enables us to evaluate the site and work to improve it. We do not link any of this anonymous data with any personal data that you may provide to us.

**Note about Internet service providers**

ICVA reminds visitors that most Internet Service Providers maintain records of all URLs visited by their customers. Visitors should contact their ISP for more information.

**Change of Privacy Policy**

We may amend and update this privacy statement from time to time. If we do, we will ensure that members are aware of the change and that the current statement is publicised on the ICVA website [www.icva.org.uk](http://www.icva.org.uk).