



GDPR POLICY

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1. Introduction

Cruse Bereavement Care Scotland ("Cruse Scotland", "we", "us", "our") is committed to protecting the privacy and rights of every individual whose personal data we hold. This policy sets out how we collect, use, store, share, and protect personal data in full compliance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018 (DPA 2018)
- The Privacy and Electronic Communications Regulations (PECR)
- All other applicable UK and Scottish data protection legislation.

This policy applies to all personal data processed by Cruse Scotland staff, volunteers, trustees, and contractors in the course of their duties. It covers data collected verbally, in written or paper form, electronically, and through our website at www.crusescotland.org.uk.

This policy does not apply to data processed by third-party websites linked from our website, or by third-party agents acting independently of Cruse Scotland.

2. Data Controller

Cruse Bereavement Care Scotland is the Data Controller for all personal data processed under this policy. As Data Controller, we determine the purposes and means by which personal data is processed.

Data Controller Contact Details
Name: Cruse Bereavement Care Scotland
Address: Suite 4/2, Great Michael House, 14 Links Place, Edinburgh EH6 7EZ
Email: info@crusescotland.org.uk
Phone: 0808 802 6161 (Support Helpline)
Website: www.crusescotland.org.uk

3. Lawful Basis for Processing

Under UK GDPR, we must have a lawful basis for processing personal data. We rely on the following lawful bases depending on the nature of the process

Lawful Basis	When We Rely On It
Consent (Art. 6(1)(a))	When you request support, volunteer with us, or subscribe to communications. You may withdraw consent at any time.
Contractual Necessity (Art. 6(1)(b))	When processing employment data necessary to administer a contract of employment.
Legal Obligation (Art. 6(1)(c))	When we are required to share or retain data to comply with law (e.g. HMRC Gift Aid records).
Vital Interests (Art. 6(1)(d))	Where sharing data may prevent serious harm to you or another person.
Legitimate Interests (Art. 6(1)(f))	For the effective administration of the charity, service improvement, and data security.

For special category data (e.g. health information, bereavement circumstances), we rely on explicit consent (Art. 9(2)(a)) or the provision of health or social care services (Art. 9(2)(h) UK GDPR).

4. Personal Data We Collect

We collect only the minimum personal data necessary for the specific purpose. The categories of data collected depend on your relationship with us:

4.1 Service Users (Clients)

When you contact us to request support, we collect:

- Full name, address, telephone numbers and email address
- Date of birth
- GP details
- Details of the bereavement (who has died, when, and cause of death)
- Availability and preferences relevant to service delivery
- At initial assessment: current personal, social and medical circumstances; background and family history; presenting issues.

4.2 Volunteers

When you apply to volunteer (as a counsellor, Helpline, or other role), we collect:

- Full name, address, telephone numbers and email address
- Background, qualifications, experience, and professional memberships
- Contact details for referees and emergency contacts
- Interview notes and placement suitability assessments.

4.3 Employees

For employment purposes, we collect:

- CV information including employment history, qualifications, and education
- Contact details and referee information
- Right-to-work documentation
- Payroll and financial information (shared only with our payroll provider).

4.4 Donors & Supporters

When you make a donation or support our work, we may collect:

- Full name, postal address, email address, and phone number
- Donation amount and payment method
- Gift Aid status and declaration
- Messages or instructions accompanying a donation.

4.5 Website Visitors

We use Google Analytics to collect anonymised data about visitor behaviour and web traffic. This includes device type, pages visited, and session duration. This data cannot identify you personally. Google Inc.'s own Privacy Policy governs how they process this data.

4.6 General Enquiries

Via enquiry forms or correspondence, we may collect your name, postal address, email address, telephone number, and the subject matter of your enquiry.

5. How We Use Your Personal Data

We use personal data only for the purposes for which it was collected, or for closely related compatible purposes. These include:

- Providing clients with professional bereavement support services
- Allocating clients to appropriately trained volunteers
- Offering appointments and notifying you of changes to services
- Recruiting, onboarding, and supporting volunteers
- Fulfilling our obligations as an employer (payroll, HR, legal compliance)
- Processing and acknowledging donations, including Gift Aid claims with HMRC
- Seeking feedback to improve service quality
- Conducting statistical analysis, research, and service planning
- Communicating organisational updates to those who have consented
- Ensuring the security and integrity of our systems and data.

We will not use your personal data for any purposes incompatible with those stated above without first seeking your consent or identifying another lawful basis.

6. Special Category and Sensitive Data

Some data we process falls into 'special categories' under UK GDPR (Article 9), including health information, details of bereavement, and family circumstances. This data is treated with the highest level of care and sensitivity.

We collect and process special category data only:

- With your explicit written consent, which you may withdraw at any time
- Where necessary for the provision of health or social care support services
- To protect your vital interests or those of another person

All staff and volunteers handling special category data receive appropriate training and are bound by confidentiality obligations.

7. Data Sharing and Disclosure

Cruse Scotland will not sell, rent, or trade your personal data. We will not share personal data with third parties except in the following limited circumstances:

- **We may share data with Police Scotland, social services, or other statutory agencies if we believe disclosure is necessary to prevent serious harm to you or another person, in line with our safeguarding obligations.** – Safeguarding and Serious Harm

- **We may disclose data where required by law, court order, regulatory requirement, or other binding legal instrument.** – Legal Compliance
- **Employee data is shared with our payroll management company solely for the administration of employee remuneration.** – Payroll Provider
- **Encrypted data may be processed and backed up by professional IT security service providers under strict data processing agreements.** – IT and Data Security

Any third parties with whom we share personal data are required to handle that data in accordance with UK GDPR and our data processing agreements. We remain accountable as Data Controller for all such processing.

8. Data Retention

We retain personal data only for as long as is necessary to fulfil the purpose for which it was collected, or as required by law. Our standard retention periods are:

Data Category	Retention Period
Client support records (paper forms)	Destroyed immediately upon conclusion of support
Client support records (electronic)	Retained only while support is active; deleted upon closure
Volunteer records	Duration of placement plus 6 years
Employee records	Duration of employment plus 6 years
Donor records and Gift Aid declarations	7 years from date of donation (HMRC requirement)
Website analytics data	As per Google Analytics retention settings (anonymised)
General enquiry records	12 months from last contact, unless an ongoing relationship exists

At the end of the applicable retention period, personal data is securely destroyed. Paper documents are shredded; electronic records are permanently deleted or anonymised.

9. Data Security

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect it from unauthorised access, loss, alteration, or disclosure. These include:

9.1 Physical Security

- All paper-based records are stored in locked filing cabinets on our premises
- Access to premises is controlled and monitored
- Identifiable personal information is kept separately from other descriptive material.

9.2 Electronic Security

- Electronic records are stored on our own password-protected server infrastructure
- Where cloud services are used, we engage only reputable, GDPR-compliant providers
- All systems require password-protected authentication
- Data is encrypted both in transit and at rest where feasible
- Regular encrypted backups are maintained by professional IT security providers.

9.3 Internet Transmission

We must advise that the transmission of information over the internet is never entirely secure. While we use industry-standard protocols and encryption to protect data sent via our website and email, we cannot guarantee the security of data in transit. Any transmission is undertaken at your own risk. Once received, strict security procedures are applied.

9.4 Staff and Volunteer Training

All staff and volunteers who handle personal data receive data protection training and are required to comply with this policy and our associated data handling procedures. Access to personal data is granted on a strict need-to-know basis.

10. Your Data Protection Rights

Under UK GDPR, you have a number of important rights in relation to your personal data. These are:

Your Right	What This Means
Right of Access	You may request a copy of all personal data we hold about you (a 'Subject Access Request'). We will respond within one month.
Right to Rectification	You may ask us to correct any inaccurate or incomplete personal data we hold.
Right to Erasure	In certain circumstances, you may request that we delete your personal data ('right to be forgotten').
Right to Restrict Processing	You may ask us to restrict the processing of your data while a dispute is being resolved.
Right to Data Portability	Where processing is based on consent or contract and carried out automatically, you may request data in a portable format.
Right to Object	You may object to processing based on legitimate interests or for direct marketing purposes.
Right to Withdraw Consent	Where processing is based on consent, you may withdraw consent at any time without detriment (except that we may be unable to continue providing support services).

To exercise any of these rights, please contact us at:

Data Rights Requests
Email: info@crusescotland.org.uk
Post: Data Protection, Cruse Bereavement Care Scotland, Suite 4/2, Great Michael House, 14 Links Place, Edinburgh EH6 7EZ

Please note: withdrawal of consent while you are actively receiving support from Cruse Scotland will require your support to end, as we cannot provide services without holding the necessary personal data.

11. Complaints and the ICO

If you believe Cruse Scotland has not handled your personal data correctly, we encourage you to contact us in the first instance so we can attempt to resolve the matter. You have the right to raise a complaint with the Information Commissioner's Office (ICO), the UK's independent supervisory authority for data protection:

Information Commissioner's Office (ICO)
Phone: 0303 123 1113
Website: https://ico.org.uk
Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

12. Children and Young People

Cruse Scotland provides bereavement support to children and young people. Where personal data relates to individuals under the age of 16 in Scotland (under 13 in England and Wales), we will seek consent from a parent or guardian unless the young person demonstrates sufficient understanding to provide their own consent, in accordance with the 'Gillick competence' principle.

All data relating to children and young people is treated with heightened care and stored securely with restricted access. Our safeguarding policy takes precedence in all circumstances involving the welfare of a child.

13. Data Breaches

In the event of a personal data breach, Cruse Scotland will:

1. Contain and assess the breach as quickly as possible
2. Document the breach in our internal breach register
3. Notify the ICO within 72 hours where the breach is likely to result in a risk to individuals' rights and freedoms (Article 33 UK GDPR)
4. Notify affected individuals without undue delay where the breach is likely to result in a high risk to their rights and freedoms (Article 34 UK GDPR)
5. Review and implement measures to prevent recurrence.

14. Cookies and Website Data

Our website (www.crusescotland.org.uk) uses cookies to enhance your browsing experience and to gather anonymised analytics data. We use:

- **Required for the website to function correctly. These cannot be disabled.** – Necessary cookies
- **We use Google Analytics to understand how visitors use our site. This data is anonymised and does not identify individuals. Google Inc. processes this data under their own privacy policy.** – Analytics cookies

Full details of the cookies used on our website, including how to manage your preferences, are available in our Terms and Conditions at www.crusescotland.org.uk/terms-and-conditions.

15. International Data Transfers

Where we use cloud-based or third-party services (such as Google Analytics) that may involve transferring data outside the UK, we ensure that adequate safeguards are in place as required by UK GDPR. These include adequacy decisions, Standard Contractual Clauses, or other lawful transfer mechanisms approved by the ICO.

16. Changes to This Policy

We review this policy regularly and will update it to reflect changes in legislation, guidance from the ICO, or our own operational practices. Where substantial changes are made, we will publish a prominent notice on our website. The 'Version' and 'Effective Date' at the front of this document will be updated accordingly.

We encourage you to review this policy periodically. Continued use of our services after a policy change constitutes acceptance of the updated terms.

17. Contact Us

For any queries about this policy, your personal data, or data protection at Cruse Scotland, please contact us:

Cruse Bereavement Care Scotland – Data Protection Enquiries

General and Data Rights: info@crusescotland.org.uk

Helpline: 0808 802 6161 (calls are free)

Address: Suite 4/2, Great Michael House, 14 Links Place, Edinburgh EH6 7EZ

Website: www.crusescotland.org.uk

Changes sheet

Date	Change Details	Author