

Robinson Memorial Hospital (Incorporated)

21 Newal Road Ballymoney

County Antrim BT53 6HB

Registered with the Charity Commission for Northern Ireland: NIC 100343

www.robinsonmemorialhospital.org.uk

PRIVACY POLICY

1. Background

The Robinson Memorial Hospital was built in the 1930's with money gifted by the late Samuel Robinson of Philadelphia, USA and formerly of Ballymoney. Not all of Samuel Robinson's gift was used for the building of the Hospital and in 1948, when the Hospital was taken over by the National Health Service, the balance of the endowment was entrusted to The Robinson Memorial Hospital (Incorporated), a Limited Liability Company originally formed to manage the Hospital. In 1948 the role of the company changed to that of managing the Robinson endowment funds. The profits from the managed investments are passed to the local Health Board who are obliged to apply these funds for the benefit of the Hospital (which now includes the adjoining Health Centre.)

The Robinson Memorial Hospital (Incorporated), a registered charity, has funds of its own (the "free funds") which were not derived from Samuel Robinson's bequest and the Board has complete discretion as to how these funds are spent for the benefit of the Hospital.

The free funds come from bequests, lifetime gifts and various local fund-raising activities. The Board welcomes gifts from whatever source but it must be emphasised that it does not carry out any fund raising of its own nor does it canvass gifts from potential donors. Donations to the Hospital are entirely "free will" and are made without any form of coercion.

The Board of the Hospital consists of 17 members drawn from across the local community. Membership of the Board is voluntary and unpaid. The Board meets four times a year and the AGM is held each June.

The Company has Members rather than Shareholders and anyone can become a Life Member upon payment of £25:00 for an individual or £40:00 for a couple. Membership can also be paid annually at £5:00 per annum but most people opt for the single payment Life Membership.

The Board does not employ any staff and the small amount of secretarial support is provided by a freelance secretary who charges on a time and disbursements basis.

2. Data Held

A Register is kept of the Members and includes their names, address and contact details as well as their classes of membership. This is the only information that is held and is provided by the individual when applying to become a Member. It is used for the following purposes only:-

- To ensure that only Members may vote at an Annual General Meeting;
- To keep Members informed of General meetings of the Company;
- To ensure that the fees of Annual Members are paid up;
- For annual audit and Companies Office returns

The Register of Members is updated as and when information regarding Members comes to hand.

The information contained in the Register of Members is used for the above purposes only and is not shared with or disclosed to any third party for any purpose whatsoever save where:-

- The Member has, upon request from the Company, consented to such sharing or disclosure; or
- Such sharing or disclosure is required or permitted by law.

A Register is kept of Donors to the Hospital and includes their names, address and contact details as well as the amounts given and any conditions attached thereto.

The information contained in the Register of Donors is not shared with or disclosed to any third party for any purpose whatsoever save where:-

- The Donor has, or his Personal Representatives have, upon request from the Company, consented to such sharing or disclosure; or
- Such sharing or disclosure is required or permitted by law.

Where a Donor invites a representative of the Board to an occasion when a donation is to be made to the Hospital and photographs are taken of that occasion, there shall be an implied consent on behalf of the Donor that details of the Donor (to the extent of names only) and the amount of the donation may be disclosed and that photographs may be published. Where such an occasion involves the staff or patients of the Hospital then the express consent of those members of staff or patients must first be obtained before any of their details are disclosed or any photographs of them are published.

3. Privacy Policy

This Privacy Policy shall be posted on the Hospital's website (www.robinsonmemorialhospital.org.uk) and a copy thereof shall be enclosed with every notice of meetings sent to Members.

Notices of meetings published in the press or in social media shall make reference to this Privacy Policy and, where appropriate, shall include a link to the Hospital's website (www.robinsonmemorialhospital.org.uk).

4. Individual's rights

Members of the Company or Donors to the Hospital have the right to inspect the respective Registers to ensure that the data held by the Company is limited to that stated above and that it is accurate and up-to-date.

Save where data is required for the purposes set out in Paragraph 2 above, Members or Donors may request that their data be deleted from their respective Registers. The Secretary of the Board shall ensure that any such request has, where possible, been complied with and shall, within 28 days from the receipt of such request, inform the data subject accordingly.

All requests to Members or Donors for the right to share or publish their data shall be made to the Members or Donors (or their Personal Representatives) individually and such consent shall be in writing and must be express, not implied.

5. Subject access requests

Requests by a Member or a Donor for access to their data shall be made in writing to the Secretary of the Company and replies to such requests shall be furnished to the persons making the requests within 28 days of such request being received.

6. Lawful basis for processing personal data

The personal data of Members or Donors may, when requested, be made available to:-

- HM Revenue and Customs
- The Companies Office
- The Company's auditors
- The Company's solicitors

In the case of the Company's auditors and solicitors the data is covered by professional privilege and by the individual firms' privacy policies.

7. Consent

Any consent obtained with regard to the disclosure, sharing or publication of any data, whether written, graphical or otherwise shall be express and shall be in writing.

The Company Secretary shall keep a record of all requests for consent and whether or not consent has been given or withheld, as evidenced by the data subject's written reply.

Any request for consent that has not been replied to by the data subject within 28 days shall be construed as consent having been withheld.

The above records shall be kept in a secure place to which only the officers of the Board shall have access.

8. Children

In any events involving children, the consent of each child's parent or guardian shall be obtained in writing together with verification of the child's age.

9. Data breaches

In the event that the data of any Member or Donor or any child of a Member or Donor shall be disclosed, published or shared without the appropriate consent, the data subject shall report the matter in the first instance to the Chairman of the Board who will make the appropriate enquiries as to the circumstances of such alleged breach. He shall communicate his findings to the data subject within 28 days of the complaint being received.

10. Changes to our Privacy Policy

This Privacy Policy will be kept under constant review and any changes will be published on our website (www.robinsonmemorialhospital.org.uk).