

## **The Free Representation Unit (FRU) Privacy Statement (Clients and Potential Clients)**

### **Your personal information and FRU**

We will need to collect, process and store information about you in order to look for a volunteer representative to help and, if one is found, so that they can deal properly with your case. We also store statistical data about your case so that we can manage our operations as well as for campaigning and fundraising activities. You can also access our GDPR Policy at [www.thefru.org.uk](http://www.thefru.org.uk).

### **What information do we gather and how is it processed?**

Initially, most of the information we gather and process will come from you, either directly or through the organisation that refers your case. This information will be processed by our admin team, who will create an electronic record of your case on our systems. We will also have a copy of the papers that you send us and this may be stored electronically.

This information will be available to our active volunteers, as we look for someone to help you.

If we are successful in finding a volunteer, they are likely to gather more information, both from you and from the other people / organisations involved in your case. They will also be processing that information as they act on your behalf. At this stage, your information will only be available to the people dealing with your case: the volunteer who is representing you and FRU's staff supporting them.

The legal basis on which FRU processes your private information is that it is necessary for us to do so, in order carry out our service, and we therefore have a legitimate interest in doing so.

Some of this information may include information that it potentially particularly sensitive (known as special category data) such as your race or ethnic origin, your political opinions, your religious belief, your trade union membership, your sexual orientation or data about your health. Normally we will only have this information either because it is relevant to your case, in which case we need to process it in order to pursue your legal claims, or as part of our equality monitoring.

We use equality data to monitor our service. If you do not want to provide some or all of this information, this is fine – just don't fill in the monitoring form or select 'Would prefer not to indicate' in the relevant section.

We will never sell your data.

### **How is information stored?**

We take our duties of confidentiality and data protection seriously. All of our case files are kept in our office, which is in a secure building. The cabinets where we keep the files are also locked. Electronic information is held on two platforms: Salesforce and Office 365. Both of these have security in place, such as passwords and encrypted communication.

It will be necessary on occasions for your case file to leave our office, for example when a volunteer has a meeting with you or attends the tribunal. Volunteers and staff receive training on how to protect your data when outside the office. We have a system in place for ensuring safe and prompt return of papers to the office.

### **How long do we keep information for?**

If we do not find a volunteer to assist you, we will keep your information until 12 months after your hearing date. This is so that, if your case is adjourned or there is a new hearing you can

inform us and we can try to help you with the new hearing, without you needing to make another referral.

If we do represent you, after your case is over, we will need to keep a copy of your case file for our records. This is required so that we can deal with any issue or complaint that might arise and is also mandated by our professional indemnity insurance. It will not normally be possible to erase personal information from this file until it is securely destroyed approximately six and a half years after a case ends. Physical files are stored off site in secure storage until they are securely destroyed. Electronic information will remain on the secure Salesforce and Office 365 systems.

We may keep statistical information for longer.

### **Your data protection rights**

Under data protection law, you have a right to know about the data we hold and you and other rights:

- Access: you can ask us for copies of your personal information.
- Rectification: you can ask us to put right inaccurate or incomplete information.
- Erasure: you can ask us to delete your personal information in certain circumstances.
- Restrict processing: you can ask us to restrict the processing of your information in certain circumstances.
- Object: you can object to the processing of your personal data in certain circumstances.
- Data portability: you can ask us to transfer your information to another organisation in some circumstances.

There is no charge for exercising your rights and we must respond to any request within one month of you making it. For more information about your data protection rights see <https://ico.org.uk/your-data-matters/>

### **Contacting FRU about your data**

Initially, you should discuss any issues with our administration team or with the volunteer acting for you.

You can also write to our Chief Executive, who is responsible for data protection at FRU:

Email: [chief.exec@thefru.org.uk](mailto:chief.exec@thefru.org.uk)

Phone: 020 7611 9555

Chief Executive Officer  
FRU, 1<sup>st</sup> Floor North  
10/11 Gray's Inn Square  
Gray's Inn  
London, WC1R 5JD

Although we would hope we can resolve any issue you have, if you are unhappy with how we have used our data you can also complain to the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113