



Caring for seafarers
around the world

COMPLAINTS POLICY

Introduction

The Mission to Seafarers Scotland ('MtSS') views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person, or organisation, that has made the complaint.

Our policy is:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
- To make sure everyone at HOPE UK knows what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely way
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired
- To gather information which helps us to improve what we do

Definition of a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of MtSS – encompassing both our fund raising and advocacy work in Scotland

Where Complaints come from

Complaints may come from any individual, volunteer or organisation who has a legitimate interest in MtSS, including the general public if something is perceived to be improper. A complaint can be received verbally, by phone, by email or in writing. This policy does not cover complaints from staff, who should refer to MtSS internal policy on such matters.

Confidentiality

All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Responsibility

Overall responsibility for this policy and its implementation lies with the board of trustees of MtSS.

Publicised contact details for Complaints

Written complaints may be sent to Mission to Seafarers Scotland, 109 Avalon Gardens, Linlithgow, EH49 7PL or by e-mail at info@mtss.scot Verbal complaints may be made by



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COOKIES POLICY

Who Operates the Website?

This website ('the Website') is operated by The Mission to Seafarers Scotland ('MtSS'), a Registered Charity in Scotland (Registered Charity Number SC041938). MtSS is a company limited by guarantee, registered in Scotland (Number: SC389483) with the registered address 109 Avalon Gardens, Linlithgow, EH49 7PL

Any user of the Website ('User') should note the below policy on Cookies.

General

A cookie is a small file of letters and numbers which contains information. As a User, you will provide consent (by agreeing to the initial cookie "pop up" banner which appears on accessing the website ("the Banner")) to this information being transferred onto and stored on a user's computer's hard drive by its browser.

Cookies enable the Website to distinguish between Users. This helps MtSS provide Users with an enhanced experience when browsing the Website and also allows MtSS to improve the Website.

Cookies used by MtSS

The Website uses the following cookies:

- Strictly necessary cookies

These are cookies which are required for the operation of the Website. They include, for example, cookies that enable Users to log into secure areas of the Website.

- Analytical/performance cookies

These allow MtSS to recognise and count the number of Users and to see how each User navigates the Website. This enables MtSS to improve the operation of the Website, for example, by ensuring that Users are easily able to find the content they are looking for.

- Functionality cookies

These are used to recognise Users on return to the Website. This enables MtSS to personalise Website content for Users, for example by recording User preferences.



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- Targeting cookies

These cookies record the visits of Users to the Website, including the pages visited and links followed. MtSS uses this information to tailor both the Website and the advertising displayed on it to the particular interests of Users. MtSS may also share this information with third parties for this purpose.

Third Party Cookies

Please note that third parties (including, for example, advertising networks and providers of external services such as web traffic analysis services) may also use cookies, over which MtSS has no control. These cookies are likely to be either analytical/performance or targeting cookies.

Disabling Cookies

Users may choose to either reject the use of cookies on the Website by using the Banner, or block cookies by activating the browser setting which allows Users to refuse the settings of all or some cookies.

Users should note that if the browser settings are used to block all cookies (including essential cookies), access to all or parts of the Website may be restricted or not function as expected.

Expiration of Cookies

Except for essential cookies, all cookies will expire after 2 years.

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PRIVACY AND DATA PROTECTION POLICY

Who we are

The Mission to Seafarers Scotland (“**MtSS**”) is a maritime welfare charity working throughout Scotland. Our simple mission is to care for the shipping industry’s most important asset: its people.

MTSS is registered as a charity in Scotland (registered charity number SC041938) and we are also registered as a company limited by guarantee (company number SC389483).

Within the context of this notice, “we” means the charity.

Our Notice

In carrying out our day to day activities we process and store personal information relating to our supporters and we are therefore required to adhere to the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679. We take our responsibilities under this Regulation very seriously and we ensure the personal information we obtain is held, used, transferred and otherwise processed in accordance with the Regulation and all other applicable data protection laws and regulations including, but not limited to, the Privacy and Electronic Communication Regulations.

We will be clear when we collect your data about why we are collecting it and what we intend to do with it, and not do anything you wouldn’t reasonably expect.

Developing a better understanding of our supporters through their personal data allows us to make better decisions, fundraise more efficiently and, ultimately, helps us to fulfil our charitable objective of caring for seafarers of all nationalities and creeds, and their families.

This privacy notice sets out our data processing practices for personal information in electronic and manual form. If you have any requests concerning your personal information or any queries regarding these practices, please contact the Data Protection Officer, details of which are provided at the end of this Notice.

Right to amend this Notice

We will regularly review and update this Privacy and Data Protection Notice and will update, modify, add or remove sections at our discretion. If we do so, we will post the changes on the “Policies page” of the website page and they will apply from the time we post them. Please check this page from time to time so that you are aware of any changes. If you continue to use our website, any of our services and/or continue to



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provide us with your personal information after we have posted the changes to this Privacy Notice we will assume that you are aware of its amended contents.

What personal information do we collect?

Personal information (also called “personal data”) is information that can be used to identify you. It can include your name, date of birth, email address, postal address, telephone number, mobile telephone number, passport number, bank account details, credit/debit card details and whether you are a UK tax payer so that we can claim Gift Aid (please rest assured we do not collect information about your actual tax payments, just whether you are a tax payer).

We do not usually collect “sensitive personal information” (also called “special categories of personal data”) about you unless there is a clear reason for doing so. For example, if you participate in an event, we may need information about your dietary or access requirements to ensure we provide appropriate facilities for you. We will make it clear to you when collecting this information what we are collecting and why.

When do we collect personal information?

We collect personal information about you when:

- i) you ask about our activities;
- ii) register with us (for example, subscribing for a publication);
- iii) make a donation to us;
- iv) register for an event;
- v) engage with us on social media;
- vi) order products and services (such as publications and Christmas cards); and
- vii) otherwise give us personal information.

We will only collect the data we need for the purposes we specify at the point of collection. We will not use your personal data for a purpose different from the one specified at collection unless you give your explicit consent for us to do so.

If you do nothing other than read pages or download information from our website, we may gather information about this using cookies, such as which pages are most visited and which events or activities are of most interest. This information can be used to help us improve our website and services and ensure we provide you with the best service.

Wherever possible, the information we use for this purpose will be aggregated or anonymised i.e. it will not identify you as an individual visitor to our website.

Why we collect and how we use your information

We collect your personal information for one or more of the following reasons:

- to provide you with the services, products or information you have requested;
- to process any donation(s) we may receive from you;



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- to provide you with information about our work or our activities, that you have asked to receive;
- to send you the items you have ordered from us;
- for administration purposes e.g. we may contact you about a donation you have made or event you have expressed an interest in or registered for;
- for internal record keeping, such as the management of feedback or complaints;
- to analyse and improve the services we offer; and/or
- where it is required or authorised by law.

If you are aged 16 or under, and would like to participate in an event, make a donation or get involved with us, please make sure that you have your parent/guardian's permission before giving us your personal information, and please send us proof of that permission.

In some circumstances, for example where you are making a donation, we cannot process your request until you have provided the information we request in our forms.

Contacting you

We would like to send you information about how we help seafarers and their families by mail, e-mail, telephone, mobile telephone or social messaging. Most of the time we will be relying on your explicit consent to contact you, in compliance with the laws on electronic marketing. In certain instances, we may rely on our legitimate interests to contact you where those interests are in line with what we think your reasonable expectations might be. For instance, where you have sent us a donation and we would like to acknowledge it, or where you have donated to us in the last two years and we want to inform you about our recent work or appeals.

Opting out

We only want to communicate with you by the method you prefer and send you information that may be of interest to you. Our forms have clear marketing preference questions and we will always include information on how to opt-out when we send you marketing communications

If you would like to opt out of receiving all or any form of communication from us, then please email info@mtss.scot. We will ensure that your preferences are updated as soon as possible.

Your information and third parties

We will not sell or swap your information with any third party. We may share your information with our data processors. These are trusted partner organisations that work with us in connection with our charitable purposes, for instance by processing our donations, mailing our newspapers to you or sending you the Christmas cards you have purchased. We will always make sure appropriate contracts and controls are in place and we regularly monitor all our partners to ensure their compliance.



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We may disclose your personal information to third parties if we are required to do so through a legal obligation (for example to the police or a government body); to enable us to enforce or apply our terms and conditions or rights under an agreement; or to protect us, for example, in the case of suspected fraud or defamation. If you have asked us to claim Gift Aid on your donations, we will share your details with HM Revenue and Customs in order to do so. We do not share your information for any other purposes.

How we store your information

We promise to respect any personal data you share with us and keep it safe. Information is stored by us on computers located in the UK. We may also store information in paper files.

We place great importance on the security of all personally identifiable information associated with our clients. As such, we have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. Whilst we cannot guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to attempt to prevent this.

We aim to ensure that all information we hold about you is accurate and, where applicable, kept up to date. If any of the information we hold about you is inaccurate and either you advise us or we become otherwise aware, we will ensure it is amended and updated without delay.

We will only keep your information for as long as required to enable us to carry out the purpose for which it was collected. We will not keep your information for any longer than is necessary. We will take into consideration our legal obligations and tax and accounting rules when determining how long we should retain your information. When we no longer need to retain your information, we will ensure it is securely disposed of, at the appropriate time in line with our data retention policy.

Legal basis for using your personal information

In some cases we will only use your personal information where we have your consent, or because we need to use it in order to carry out a contract with you or take steps in order to carry out a contract with you (for example when you make a donation through our website, or where you buy products from us).

However, in other cases we may use other lawful grounds to process your information:

- We have certain 'Legitimate interests' to process your personal information to help us to achieve our goals as a charity. When we use legitimate interests to process your personal information, we carefully consider your rights and interests. We will not process your personal information using legitimate interests if the impact on your rights and interests outweighs our interests. Our legitimate interests include:
 - to communicate with our existing donors, including acknowledging donations and informing them about recent work or appeals;



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- to develop awareness about our charity and its work;
- to improve our website and our services;
- to prevent fraud and to keep our network and information secure;
- to assert or enforce our legal rights;
- to deal with complaints and claims;
- to comply with guidance from relevant regulators such as the Charity Commission;
- to maintain and administer our charity and our records;
- We may need to use your personal information to comply with our legal obligations.

Our Website

For all areas of our website which collect personal information, we use a secure server. We enforce strict procedures and security features to protect your information and prevent unauthorised access.

Our website contains links to other websites belonging to third parties and we sometimes choose to participate in social networking sites including but not limited to Facebook, Twitter, YouTube, Instagram and LinkedIn. We may include content from sites such as these on our websites but we do not have any control over the privacy practices of these other sites.

You should make sure when you leave our site that you have read and understood that site's privacy policy in addition to our own.

Your Rights

It is your choice the type of communications and information you receive about our charity. You can change your mind at any time by contacting emailing info@mtss.scot

You have the right to:

- request a copy of the personal information we hold about you;
- withdraw your consent if we are relying on your consent to process your personal information;
- update or amend the personal information we hold about you if it is wrong;
- change your communication preferences at any time;
- ask us to remove your personal information from our records;
- object to the processing of your information for marketing purposes; or
- raise a concern or complaint with us or with the UK's Information Commissioner's Office about the way in which your personal information is being used.

If you wish to find out more about these rights, if you have questions or queries about this Privacy and Data Protection Notice, to obtain a copy of the information we hold



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about you or to make a complaint about how your personal data has been used by us,
please contact us at:

The Mission to Seafarers Scotland
109 Avalon Gardens
Linlithgow
EH49 7PL

Tel: 01506 670473
Email: info@mtss.scot

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phone to +44 (0) 1506 670 473 or in person to any of MtSS's staff or trustees at the same address as above or at any of our events.

Receiving Complaints

Complaints may arrive through channels publicised for that purpose or through any other contact details or opportunities the complainant may have, such as social media. Complaints received by telephone or in person need to be recorded.

The person who receives a phone or in person complaint should:

- Write down the facts of the complaint
- Take the complainant's name, address and telephone number
- Note down the relationship of the complainant to MtSS, e.g. donor, volunteer, sponsor
- Tell the complainant that we have a complaints procedure
- Tell the complainant what will happen next and how long it will take
- Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words

Resolving Complaints

Stage One

In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate. Whether or not the complaint has been resolved, the complaint information should be passed to the MtSS Chairman within five business days.

On receiving the complaint, the Chairman records it in the complaints Logbook. If it has not already been resolved, he/she delegates an appropriate person to investigate it and to take appropriate action. If the complaint relates to a specific person, they should be informed and given a fair opportunity to respond.

Complaints should be acknowledged by the person handling the complaint within five working days. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply. A copy of this complaint's procedure should be attached. Ideally complainants should receive a definitive reply within a month. If this is not possible because for example, an investigation has not been fully completed; a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

Stage Two

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Board level.

At this stage, the complaint will be passed to the Board of Trustees. The request for Board level review should be acknowledged within five working days of receiving it. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

The Board of Trustees will investigate the facts of the case themselves. This may involve reviewing the paperwork of the case and speaking with the person who dealt with the complaint at Stage One. The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

If the complaint relates to a specific person, they should be informed and given a further opportunity to respond. Ideally complainants should receive a definitive reply within a month. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given. Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint. The decision taken at this stage is final, unless the Board decides it is appropriate to seek external assistance with resolution.

External Stage

As MtSS is a Scottish registered charity, the complainant can complain to the Scottish Charity Regulator at any stage. Information about the kind of complaints the OSCR can involve itself in can be found on their website at:
<http://www.oscr.org.uk/charities/raise-a-concern-about-a-charity>.

Variation of the Complaints Procedure

The Board may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example, a complaint about a Chair or trustee should not also have the Chair and/or trustee involved as a person leading a Stage Two review.

Monitoring and Learning from Complaints

Complaints are reviewed annually to identify any trends which may indicate a need to take further action.

Review

This policy is reviewed regularly and updated as required.

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