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Updated: 3rd April 2025

Infosound is an independent all-volunteer charity, registered in England and Wales (no. 1142082) and in Scotland (no. SC039929). Infosound's Constitution states that the charity's objects are "to serve the needs of any person resident in the United Kingdom who is blind (severely sight-impaired) or partially-sighted (sight-impaired) or labouring under some temporary or permanent incapacity or disability which makes reading print material inaccessible to them, by the provision of information in audio and other accessible formats."

Infosound Privacy Policy



Introduction

Infosound audio transcribed written information, usually produced by others, into the accessible medium of audio for the benefit of blind and partially-sighted (severely sight-impaired and sight-impaired) people in Great Britain. We may also advise and support other organisations and individuals to do the same through remote training sessions and informal advice sessions. Infosound does not have members; no one joins Infosound.

It is considered fairly unlikely that InfoSound volunteers will interact with, or have extensive contact with, members of the public, unless they were to contact us directly to request printed material they have received to be transcribed into audio. In the main, Infosound volunteers and trustees would only interact with others within the vision impairment sector or other professionals or volunteers in connection with our support services.

Policy

There are only three reasons why we might hold personal data about someone on record for a while; and this would usually be their name and/or their postal address and/or their telephone number and/or their email address.

- If we receive a donation, unless instructed otherwise, we always write to acknowledge receipt and to thank the donor. We would keep a record of the donation as well as the donor's details; but, apart from (where applicable) reclaiming Gift Aid through HMRC, we would never share any of this information with a third party.
- In the day-to-day working of the charity, we naturally receive emails, letters and phone calls. Any data contained within these communications is retained by Infosound; but we would never share any of this data with a third party.
- Although Infosound might keep on record the contact details for any individual or organisation that requests our audio transcriptive or support services, this information would never be shared with any third party and there would be little need for us to follow-up with any form of communication with them after that work has been carried out.

GDPR Exemption

Between March 2014 and March 2025, Infosound was registered with the Information Commissioner's Office (ICO) under the General Data Protection

Regulation (GDPR), which came into force on 25th May, 2018. Prior to that, Infosound registered under the data Protect Act on 29th March 2014.

However, following written consultation with the ICO in March 2025, it was agreed Infosound was exempt from being formally registered with them, according to the following guidelines, which they publish:



Guidance Note: The exemption from registration for 'not-for-profit' organisations

This note aims to answer a number of questions regularly raised by charities and voluntary organisations about the exemption from the requirement to pay the fee under GDPR for 'not-for-profit' organisations. You can find advice about other aspects of registration on our website (www.ico.org.uk).

1. Who is this exemption for?

Organisations which are established for not-for-profit making purposes can be exempt from notifying. The exemption may therefore be appropriate for small clubs, voluntary organisations and some charities. A not-for-profit organisation can make a profit for its own purposes, which are usually charitable or social, but the profit should not be used to enrich others. Any money that is raised should be used for the organisation's own activities.

Any organisation which is not sure whether or not it is a non-profit making organisation should get appropriate advice, probably from their accountant or legal adviser.

2. Are there limits on the processing for an organisation that uses this exemption?

The exemption is narrow and further conditions do apply.

The exemption applies to processing which is only for the purposes of:

- establishing or maintaining membership;
- supporting a not-for-profit body or association; or
- providing or administering activities for either the members or those who have regular contact with it.

This would include giving support to individuals. It is also clear that although the contact the organisation has with people should be regular, it does not need to be frequent. So an organisation that provides activities or support on an ongoing basis to the same individuals (even if a minority only contact the organisation once) will fall within the exemption. However, one that deals with either few or many individuals on a one-off or isolated basis, such as in a drop-in centre, will not.

The exemption also restricts:

- the type of personal information an organisation can hold;
- the people that it relates to; and
- the disclosures that an organisation can make;

to only those necessary for the purposes described above unless the individual agrees their personal information can be released. The information must not be kept after the relationship between the individual and the organisation ends, unless it is necessary for the purposes described above.

3. A large not-for-profit organisation has a head office and numerous independent branches across the country. The head office provides a range of umbrella services to the branch network, including membership administration, recruitment marketing campaigns and a variety of member benefit services such as tailored insurance and mortgage products. How does the exemption apply in these circumstances?

It is likely that the broad commercial nature of some of the head office functions will require it to notify. The branches, as separate legal entities, will need to consider their own positions carefully. Where they exist to undertake limited social and charitable activities for their local membership and simply pass on to head office member enquiries and application forms for insurance and financial products, they may be able to rely on the exemption from registration.

4. Other issues for charities to consider when relying on the not-for-profit organisations exemption.

Some small charities may be able to meet the strict conditions of the exemption. However, many charities are large international concerns with significant donor direct marketing and merchandising activities operating on a semi-commercial basis. While they may be able to fulfil some of the relevant conditions, the range of operations is likely to prevent them relying on the exemption. For example, a large charity may have offices and warehousing covered by CCTV equipment. Using this equipment means it is unlikely that an organisation can rely on the exemption. A charity that uses personal information to check its suppliers or creditors with a credit reference agency will not be able to use the exemption.

Even though an organisation may be able to claim an exemption, they can decide to make a voluntary registration. It is important to be aware that when an organisation relies on an exemption from registration, they still must still comply with the principles of GDPR. They are obliged to respond to a written request to provide the information that would have been included in the public register if they had registered.

More information

If you need any more information about this or any other aspect of data protection, please contact the ICO

Phone: 0303 123 1113

Website: www.ico.org.uk

The key sentence from these ICO guidelines for Infosound is “It is important to be aware that when an organisation relies on an exemption from registration, they still must still comply with the principles of GDPR”. Infosound will always endeavour to do that.

Should anyone wish to challenge our exemption from GDPR registration or to ask a specific question about our use and storage of personal data, we may be emailed at info@infosound.org.uk and our address is: [PO Box 20, Brighton BN2 7XX](#).

The charity’s current Data Protection Registration Certificate, as issued by the Information Commissioner’s Office is shown below:

This privacy policy should be:

- reviewed and agreed by the trustees at least once a year and updated, or amended, as appropriate in the interim.
- be promoted to all volunteers and, as necessary, to other contractors or those working with the charity.
- be made available for the public to read at any time on the charity's web site.

Infosound Safeguarding Policy



Introduction

The purpose of this policy is to protect everyone, including vulnerable adults, from any harm that may be caused whilst working at, or as a direct result of requesting audio transcriptive work to be carried out by Infosound for blind and partially-sighted people in Great Britain.

This policy lays out the commitments of the charity Infosound and it is produced to inform all trustees, volunteers of Infosound of their responsibilities in relation to safeguarding themselves and the public.

Background

Because of the age demographic of vision-impairment in Great Britain, it is considerably more likely that Infosound will be heard, or contacted, by adults rather than children. These adults are deemed to be “vulnerable” by dint of their disability of vision-impairment (blindness or partial sight) and this is the listening audience Infosound directly serves. However, it is realised that other disabilities can sometimes accompany blindness (severe sight-impairment) or partial-sight (sight-impairment).

It is also recognised that “vulnerable” adults may work or volunteer for the charities, organisations or businesses with which we interact when offering technical and production advice and training.

Since Infosound has no premises of its own, trustees and volunteers generally work from home or they may congregate, in very small numbers, at someone's home. Trustee meetings are also held in a domestic environment. Significantly, because Infosound is a producer of audio content that is communicated to the vision-impaired the recipient through a thirds party charity or organisation, it is extremely unlikely that any member of the charity would come into direct physical contact with a member of the vision-impaired public or the charities, organisations or businesses we serve; although phone conversations may be had with them. Additionally, no

member of the public or representative of a charity, organisation or business would ever visit the private home of a trustee or volunteer.

However, it is recognised that Infosound has a safeguarding responsibility in editorial and advice-giving terms and that it needs to robustly manage the nature of the content it broadcasts or distributes and the advice it offers.

Policy

- 1.** Ultimate responsibility for safeguarding rests with Infosound's trustees, under the direction of its Chair. There is a nominated and named Safeguarding Officer, to whom any concerns should be reported immediately. This person is trustee Marian Myers. Both the Chair of Trustees and the charity's Safeguarding Officer may be contacted simultaneously by emailing safeguarding@infosound.org.uk. Both may also be reached via the charity's phone number: 03000 111 555.
- 2.** All suspicions or allegations of abuse against, or concerns regarding, any other person, whether within the charity, another organisation or amongst the public, will be taken seriously and dealt with immediately and appropriately.
- 3.** All volunteers of Infosound must be encouraged to recognise, respond and report anything untoward, whether or not it is directly connected with the charity's work. This means that if a trustee or volunteer sees something that gives them cause for concern then, if appropriate, they should intervene and report it to the Safeguarding Officer. The nominated Safeguarding Officer must then immediately:
 - a. bring this to the attention of all charity trustees, should it refer to something within the charity, or
 - b. notify a relevant organisation, charity, authority or statutory agency, should it be observed outside the charity, in another organisation or within the general public.Nothing should be ignored.
- 4.** Special care should be taken when dealing with blind and partially-sighted members of the public over the phone or elsewhere, especially in regard to not giving advice about best practice on daily living or vision-impairment issues. At all times vision-impaired people should be encouraged to only seek advice and support from professional specialists in the field of ophthalmology and/or well-established and responsible charities set up to support those who live with sight loss.
- 5.** Any information distributed by Infosound, whatever the source, must adhere to the charity's editorial remit to, at all times, be fair, accurate, objective and impartial and not to encourage a listener to take a course of action that would cause them any physical, emotional or financial harm. This also applies to any

charity, organisation or business to which we offer advice or support. These considerations overlap with the charity's GDPR responsibilities when it comes to maintaining the privacy and identity of any individual, including revealing, albeit unintentionally, someone's home address and other personal contact information, according to their wishes. Compliance with this is the responsibility of the charity's Managing Editor.

This safeguarding policy should be:

- reviewed and agreed by the trustees at least once a year and updated, or amended, as appropriate in the interim.
- be promoted to all volunteers and, as necessary, to other contractors or those working with the charity.
- be made available for the public to read at any time on the charity's web site.

Infosound Health & Safety Policy



Introduction

Infosound is committed to ensuring the safety of its volunteers, members of the public and anyone else who might be affected by its operations.

The purpose of this policy is to protect all Infosound trustees and volunteers from any harm that may be caused whilst working for the charity. By implication, this protection extends to any member of the public and others working within the vision-impairment sector on the rare occasion that Infosound volunteer activities are taken outside the workplace, for example to meetings, exhibitions and conferences.

This policy lays out Infosound's commitments in this area, and it is produced to inform all Infosound trustees and volunteers of their responsibilities in relation to their own safety, health and wellbeing, as well as that of colleagues and the public.

Background

Health and Safety policy is generally addressed under the following headings:

- Risk Assessments
- Manual Handling Assessments
- COSHH Assessments
- Fire Risk Assessments

- First Aid Arrangements
- Emergency Procedures
- Accident Reporting and Investigation
- Welfare
- Equipment Inspections & Records
- Health surveillance

Since Infosound has no premises of its own, trustees and volunteers generally work from home or they may congregate, in very small numbers, at someone's home. Trustee meetings are also held in a domestic environment.

Significantly, because Infosound is a producer of audio content, it is extremely unlikely that any member of the charity would come into direct physical contact with a member of the vision-impaired public we serve or with others within the vision-impairment sector.

However, trustees and volunteers must remain vigilant at all times and aware of the possibility of any of the above areas of health and safety concern having the ability to cause harm. As such, they must always address any potential hazard or unsafe practices efficiently and effectively, should any potential threat be identified to anyone working or volunteering for Infosound or to anyone outside the charity who may have direct dealings with Infosound trustees or volunteers in the course of their work for the charity.

Policy

1. Ultimate responsibility for all health and safety issues rests with Infosound's trustees, under the direction of its Chair. There is a nominated and named Health and Safety Officer, to whom any concerns should be reported immediately. This person is Lead Volunteer Editor Rowland Myers. Both the Chair of Trustees and the charity's Health and Safety Officer may be contacted simultaneously by emailing healthandsafety@infosound.org.uk. Both may also be reached via the charity's phone number: 03000 111 555.

A key element of this policy is that the nominated Health and Safety Officer and the Chair of Trustees (or if unavailable another trustee) must, at all times, be able to discuss any health and safety concern or issue and efficiently implement a remedial course of action to contain the immediate situation and to repeat any re-occurrence. Nothing should be ignored.

2. All volunteers of Infosound must be encouraged to recognise, respond and report any equipment or working practice, whether or not it is directly connected with the charity's work. This means that if a trustee or volunteer sees something that gives them cause for concern then, if appropriate, they should intervene and report it to the Health and Safety Officer. The nominated Health and Safety Officer must then immediately:
 - a. make sure any unsafe activity is ceased immediately, remove all personnel from any potentially unsafe situation or equipment and bring the situation to the attention of all charity trustees, should it refer to something within the charity, or
 - b. notify a relevant organisation, charity, authority or statutory agency, should it be observed outside the charity, in another organisation or within the general public.
3. Special care should be taken when dealing with blind and partially-sighted members of the public. Safe guiding techniques should be known by all members of Infosound who might have cause to meet anyone who lives with sight loss so that person can be removed from any potential danger efficiently and respectfully.
4. Any information distributed by Infosound, whatever the source, must adhere to the charity's editorial remit to, at all times, be fair, accurate, objective and impartial and not to encourage a listener to take a course of action that could cause them any harm. Compliance with this is the responsibility of the charity's Lead Volunteer, who oversees editorial policy on a day-to-day basis.

This health and safety policy should be:

- reviewed and agreed by the trustees at least once a year and updated, or amended, as appropriate in the interim.
- be promoted to all volunteers and, as necessary, to other contractors or those working with the charity.
- be made available for the public to read at any time on the charity's web site.
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Infosound Editorial Policy



Introduction

In keeping with our Safeguarding Policy, Infosound takes its editorial responsibilities very seriously.

Although Infosound is rarely the source of the information we audio transcribe, we are an essential part of the process and we recognise that we have a responsibility

to ensure that nothing we say might encourage a blind or partially sighted person to undertake a course of action that could cause them physical, emotional or financial harm.

So, we approach our audio descriptive work within the framework of the editorial policy to which Infosound has always adhered

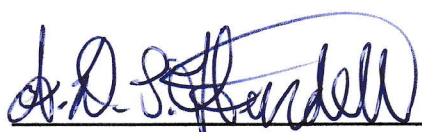
Policy

- Our provision of news and information should be regarded as a public service, requiring no membership to obtain its access.
- No charge should ever be made to vision-impaired (blind and partially-sighted) people for any of news or information services.
- At all times, we aim to be impartial, objective and fair in our editorial representation of all subjects we feature.
- We promote no opinion of our own.
- We may not necessarily align with comments or opinions expressed within the audio material we produce.
- We do not benefit in any way by distributing news and information about providers of goods or services or by reflecting the opinions of those featured.
- The content, style and editorial integrity of all material produced by us is not influenced by those providing funding, goods or services to the charity.

To this end, Infosound would not hesitate to respectfully advise the author or source of any written material we audio transcribe, should we feel their content breaches our own editorial guidelines. Should no common ground be established on any editorial matter arising, Infosound would, regrettably, have to decline its audio transcriptive services.

Infosound Privacy Policy, Safeguarding Policy, Health & Safety Policy and Editorial Policy Review and Adoption

Infosound's Privacy, Safeguarding, Health & Safety and Editorial Policies have been reviewed and agreed by Infosound's trustees and they are hereby adopted by the charity until otherwise amended.

Signed 
(Andrew Hindell, Chair of Trustees)

Date 01/04/2025