

## **FRIENDS OF DOUBLE JOY**

### **Data Protection Policy**

#### **Introduction**

Friends of Double Joy (FODJ) needs to keep certain information on its supporters and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations. Friends of Double Joy (FODJ) is therefore a Data Controller under the Data Protection Act 1998 and the General Directive on Data Protection (GDPR) introduced in 2018, which means that we determine the purposes for which personal information will be used.

To comply with legislation, personal information will be collected and used fairly, stored securely and not disclosed to any other person unlawfully. The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the charity. This policy covers all those carrying out roles and responsibilities for the charity including trustees and helpers.

#### **Data Held and Processed**

All those involved with running or supporting FODJ are entitled to:

- Know what information FODJ holds and processes about them and why
- Know how to gain access to it
- Know how to keep it up to date
- Know what FODJ is doing to comply with its obligations under the 1998 and 2000 Acts as well as GDPR

#### **Principles of Data Protection**

In line with the Data Protection Act 1998 principles, FODJ will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures

The definition of 'Processing' means collecting, amending, handling, storing or disclosing personal information.

Under GDPR, these eight principles are retained but summarised within a new six-point profile to which FODJ is committed. Accordingly, Personal Data we process should be:

- Lawful, fair and transparent
- Limited for its purpose
- Adequate and necessary
- Accurate
- Kept only for as long as needed
- Provide for Integrity and Confidentiality

## Types of Information Processed

The Data Protection Act provides conditions for the processing of any personal data.

**Personal data** is defined as data relating to a living individual who can be identified from:

- That data
- That data and any other information which is in the possession of, or is likely to come into the possession of the data controller, and includes an expression of opinion about the individual, and any indication of the intentions of the data controller, or any other person in respect of the individual.

**Criminal Offence data** applies to personal data relating to criminal convictions and offences, or related security measures.

## FODJ Information Processing Flows

<b>Data Collection Point</b>	Emails	Postal correspondence	Gift aid forms	Text messages	DBS information
<b>Type of Information</b>	Contact details	Contact details and signature	Contact details and signature	Contact details	Criminal record Checking of documentation with identity and address
<b>Point of Consent</b>	Opt in consent	Opt in consent	Opt in consent	Opt in consent	Opt in consent
<b>Lawful Purpose</b>	Consent for newsletter distribution and communication purposes	Consent for newsletter distribution and communication purposes	Consent in line with HMRC regulations	Consent for communication purposes	Safeguarding
<b>Storage</b>	Password protected laptops/PCs and devices	Locked cabinet	Locked cabinet	Password protected mobile phones	Locked cabinet

## Notification

FODJ's needs for processing personal data are recorded on the public register maintained by the Information Commissioner (ICO). We notify and renew our notification on an annual basis as the law requires.

If there are any interim changes, these will be notified to the Information Commissioner within 28 days.

The name of the Data Controller within our organisation as specified in our notification to the Information Commissioner is Christine Hinde.

## Responsibilities

Under the Data Protection guidelines, overall responsibility for personal data in a not-for-profit organisation rests with the governing body. In the case of FODJ, this is the Board of Trustees. The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:

- understanding and communicating obligations under the Act and GDPR
- identifying potential problem areas or risks
- producing clear and effective procedures
- notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes

All those involved with running FODJ who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy may result in disciplinary proceedings.

## Policy Implementation

We will ensure that:

- Anyone wanting to make enquiries about handling personal information, knows what to do;
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly.

## Gathering and Checking Information

Before personal information is collected, we will consider the purpose of the information we are gathering. We will inform people whose information is gathered, according to our information processing flow and the circumstances where disclosure might be necessary.

Special category data and criminal offence data only be used for the exact purpose for which permission was given in line with our Safeguarding Policy.

## Data Security

FODJ will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- **Electronic Records** – FODJ recognises that information may be held on portable electronic devices such as mobile phones, tablets and laptops. All laptops and devices containing data must be password protected.
- **Laptops:** All documents containing any identifiable, confidential or special category data must be stored securely. All laptops and devices containing data must be password protected.
- **Mobile phones:** FODJ user's details should be at a minimum, i.e. first name and/or initials only. All phones must be kept securely and password protected.

Any loss of any electronic device with information on must be reported to the Data Controller who will consider whether the information is reportable to the Information Commissioner within 72 hours.

## Subject Access Requests

Anyone whose personal information we process has the right to know:

- What information we hold and process on them

- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong. Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to Christine Hinde, Data Controller.

The following information will be required before access is granted:

- Full name and contact details of the person making the request
- their relationship with the charity
- Any other relevant information- e.g. timescales involved
- We may also require proof of identity before access is granted. The following forms of ID will be required: Passport, driving license, birth certificate.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within 20 working days from receiving the written request. We may refuse to disclose information where the disclosure is not in the public interest or where it could lead to a breach of the Data Protection Act.

Christine Hinde  
Trustee of FODJ and Data Controller  
On behalf of Friends of Double Joy  
16<sup>th</sup> May 2018