

Privacy Policy

Document Control

Item	Detail
Policy Title	Privacy Policy for the charity
Document Reference	ORG/DP/007
Version	1.0
Effective Date	
Next Review Date	

1.0 Purpose and Legal Basis

This Privacy Policy is a cornerstone of the charity's governance framework. It has been established to ensure that all personal data is handled lawfully, ethically, and with the highest degree of care. Its purpose is to build and maintain trust with our beneficiary community, protect the privacy of every individual we interact with, and ensure the charity meets its strict legal obligations under UK data protection law.

1.1 Purpose

This policy articulates the charity's unwavering commitment to protecting the personal data of its beneficiaries, trustees, volunteers, and other stakeholders. This commitment is intrinsically linked to our charitable objects, as defined in Clause 3 of our Constitution. We process personal data to fulfil our core mission, which includes delivering essential support, conducting and promoting research, providing financial assistance, preserving heritage, and maintaining a vital communications network for the Beneficiary Community.

1.2 Legal Basis

The charity is governed by the laws of England and Wales. This policy is designed to ensure full compliance with all relevant UK legislation. The primary legal frameworks this policy adheres to are:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Equality Act 2010
- Commitment to future legislation, such as the principles anticipated in any forthcoming Data (Use and Access) legislation.

This policy outlines why we collect data, who it applies to, and what our responsibilities are when managing it.

2.0 Scope

This policy serves as a universal framework for data protection across the charity. It applies to all personal data that the charity processes, regardless of whether it is stored electronically, on paper, or by other means. The principles and procedures outlined herein cover all individuals associated with the charity's operations, ensuring a consistent and high standard of data handling.

2.1 Individuals Covered

This policy applies to all individuals acting on behalf of the charity, including:

- Trustees
- Staff (if any)
- Volunteers
- Beneficiaries
- Contractors and third-party service providers

2.2 Data Covered

This policy applies to all personal data and special category data processed by the charity. This includes data relating to our beneficiary community, which is explicitly defined in Clause 3(1) of our Constitution.

The charity recognises that much of the data we process, particularly concerning the health and wellbeing of our beneficiaries, is of a highly sensitive nature and requires the utmost level of protection and confidentiality.

3.0 Policy Statement

This Policy Statement represents the foundational pledge of the charity regarding data privacy. It encapsulates our organisational ethos and our deep-seated commitment to the community we serve.

The charity is unequivocally committed to processing personal data transparently, fairly, lawfully, and securely, in full compliance with UK data protection legislation. We value the privacy of every member of our community and will take all necessary and appropriate steps to protect it.

This commitment is underpinned by a shared understanding of the key concepts and definitions that govern data protection.

4.0 Definitions

Clear and consistent terminology is essential for the effective implementation of this policy. This section provides definitions for key terms used throughout this document to ensure a shared understanding among all trustees, volunteers, and stakeholders.

Term	Definition
Personal Data	Any information relating to an identified or identifiable living individual. This can include names, identification numbers, location data, or factors specific to the physical, genetic, mental, economic, cultural, or social identity of that person.
Special Category Data	Personal data is more sensitive and therefore requires greater protection. This includes information about an individual's race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life, or sexual orientation.
Processing	Any operation performed on personal data, whether or not by automated means. This includes collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, alignment, restriction, erasure, or destruction.
Data Controller	The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. The charity is the Data Controller for the personal data it processes.

Data Processor	A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
Data Subject	The identified or identifiable living individual to whom personal data relates.
Beneficiary	As defined in Clause 3(1) of the Constitution.

5.0 Procedures

This section outlines the charity's core operational procedures for managing personal data throughout its entire lifecycle, from collection to disposal. These procedures are designed to embed the principles of data protection into our day-to-day activities, ensuring regulatory compliance and safeguarding the rights of individuals.

5.1 Data Protection Principles

We will adhere to the core principles of the UK GDPR. All personal data shall be:

- Processed lawfully, fairly, and in a transparent manner. **Lawfulness, Fairness and Transparency.**
- Collected for specified, explicit, and legitimate purposes. **Purpose Limitation.**
- Adequate, relevant, and limited to what is necessary **Data Minimisation.**
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits identification for no longer than is necessary. **Storage Limitation.**
- Processed in a manner that ensures appropriate security, **Integrity and Confidentiality.**
- The charity, as the Data Controller, is responsible for and must be able to demonstrate compliance with these principles: **Accountability.**

5.2 Lawful Basis for Processing

For every distinct processing activity, the charity will identify, establish, and document a valid lawful basis under UK GDPR before any data is processed. This ensures that every use of personal data is justified and legally sound.

5.3 Data Collection and Use

Personal data will only be collected for specified, explicit, and legitimate purposes directly related to the charity's objects. These purposes include, but are not limited to, assessing grant applications, conducting research to support the community, and providing news and information via our communications network.

5.4 Data Storage and Security

The charity is committed to protecting personal data from unauthorised access, alteration, disclosure, loss, or destruction. We will implement appropriate technical and organisational security measures to safeguard the data we hold. The specific measures are detailed in the charity's Information Security Policy.

5.5 Data Sharing with Third Parties

Personal data may only be shared with external contractors or service providers (Data Processors) under strict conditions. The charity will conduct robust due diligence on all third-party data processors to ensure they provide sufficient guarantees to implement appropriate security measures. This procedure replaces a previously inadequate process and is a critical control to ensure our partners protect our community's data to the same high standard we demand of ourselves.

5.6 Data Retention and Disposal

Personal data will not be retained for longer than is necessary for the purposes for which it was collected. When data is no longer required, it will be disposed of securely. Specific retention periods for different categories of data are defined in the charity's Document Retention and Archiving Policy.

5.7 Data Subject Rights

The charity fully respects the rights of individuals regarding their personal data. These rights include:

- The Right of Access (to obtain a copy of their data).
- The Right to Rectification (to have inaccurate data corrected).
- The Right to Erasure (the "right to be forgotten").
- The Right to Restrict Processing.
- The Right to Data Portability.
- The Right to Object to processing.

Individuals can exercise their rights at any time by contacting the Data Protection Officer. The procedures for managing an access request are detailed in our Subject Access Request (SAR) Policy, while procedures for all other rights are located in the Data Subject Rights Policy.

5.8 Data Breach Management

The charity is committed to managing any personal data breach effectively and transparently. We have a clear procedure in place to identify, assess, and, where required by UK GDPR, report breaches to the Information Commissioner's Office (ICO) and affected individuals. This process is detailed in our Data Breach Notification Policy.

6.0 Roles and Responsibilities

Clear accountability is vital for effective data protection. This section assigns specific responsibilities for the implementation, oversight, and day-to-day management of this policy across the charity's structure.

Role	Assigned Responsibilities
The Board of Trustees	The Board of Trustees holds ultimate responsibility and accountability for ensuring the charity complies with all data protection legislation. This duty is derived from their overarching function to manage the affairs of the CIO, as set out in Clause 9(1) of the Constitution. The Board is responsible for formally approving this policy and ensuring that adequate resources are allocated to support its implementation.
The Data Protection Officer (DPO)	The Data Protection Officer (DPO) is responsible for monitoring internal compliance with this policy, advising the Board on data protection obligations, and acting as the primary point of contact for data subjects and the Information Commissioner's Office (ICO). The Board acknowledges the potential for a conflict of interest in the current appointment and will take all necessary measures to ensure the DPO's operational independence in the performance of their duties.
Staff, Volunteers, and Contractors	All individuals working for or on behalf of the charity have a duty to handle personal data in accordance with this policy and its related procedures. They are required to complete all assigned data protection training and to report any data protection concerns or incidents to the DPO without delay.

7.0 Implementation

Embedding this policy into the charity's culture and operations is critical to its success. A successful implementation strategy goes beyond formal adoption and requires proactive communication, comprehensive training, and the allocation of sufficient resources.

1. **Adoption and Timeline:** This policy is effective from the date of its formal adoption by the Board of Trustees. It supersedes all previous versions of the charity's data protection policy.
2. **Training:** All trustees, volunteers, and any relevant contractors who process personal data on behalf of the charity will receive mandatory training on this policy and their specific data protection obligations. This training will be provided upon induction and refreshed on a regular basis.
3. **Resources:** The Board of Trustees will ensure that adequate resources (including time, training, and technology) are made available to support the effective implementation and ongoing maintenance of this policy and its associated procedures.

8.0 Monitoring, Review, and Reporting

This Privacy Policy is a living document that requires regular review and evaluation to remain effective, relevant, and compliant with evolving legislation. This section defines the mechanisms for monitoring its performance and ensuring its continued fitness for purpose.

- **Key Performance Indicators (KPIs):** The DPO will monitor the policy's effectiveness using key indicators, including:
 - The number of data subject requests received and fulfilled within the statutory timeframe.
 - A log of all data breaches or security incidents, their impact, and the remedial actions taken.
- **Reporting:** The DPO will provide a formal report on data protection compliance, activities, and any incidents to the Board of Trustees at least annually.
- **Review Schedule:** This policy will be formally reviewed by the Board of Trustees at least annually to ensure its ongoing suitability and compliance. The policy will be reviewed more frequently if there are significant changes to data protection legislation or to the charity's operations and processing activities.

9.0 Related Policies

This Privacy Policy operates as part of an integrated suite of governance documents designed to ensure robust data management. The following policies and procedures should be read in conjunction with this document to provide a complete understanding of the charity's data protection framework.

- Data Breach Notification Policy
- Information Security Policy
- Subject Access Request (SAR) Policy
- Data Subject Rights Policy
- Document Retention and Archiving Policy
- Conflict of Interest Policy

- Guidance on Use of Images