

Data Protection Policy

DATA PROTECTION ACT AND GENERAL DATA PROTECTION REGULATION

1.1.1. General Statement of the Charity's Duties

The Charity is required to process relevant personal and sensitive personal data regarding applicants, beneficiaries, donors, leaders, trustees and other volunteers as part of its operation and shall take all reasonable steps to do so in accordance with this Policy. To achieve this, the Charity endeavours to comply with the General Data Protection Regulations due to come into law in May 2018.

The Charity is registered with the Information Commissioner's Office and our number is Z8163255. The Data handler/protection Controller is Simon Gruselle.

1.1.2. The Principles

The Charity shall as far as is reasonably practicable ensure all data are:

- "a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

What is your lawful basis for process data? **Legitimate Interest** and annexed to this policy is our **Legitimate Interest Assessment (LIA)**, I have attached a copy for you.

1.1.3. Personal Data

Personal data cover both facts and opinions about an individual. It includes information necessary for applicants, beneficiaries, donors, leaders, trustees and other volunteers such as name and address; it may also include information about the person's health and

appraisals. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

1.1.4. Processing of Personal Data

An individual's consent may be required for the processing of personal data unless other processing is necessary for the performance of any contract. Any information that falls under the definition of personal data will remain confidential and will only be disclosed to third parties with the consent of the individual.

1.1.5. Sensitive Personal Data

The Charity may, from time to time, be required to process sensitive personal data regarding applicants, beneficiaries, leaders and trustees. Where sensitive personal data are processed by the Charity, the explicit consent of the individual will generally be sought in writing. Sensitive personal data include:

- o medical information
- o religious or other beliefs
- o education and training details
- o family lifestyle and social circumstances
- o financial details
- o physical or mental health or condition
- o the commission or alleged commission of an offence.

1.1.6. Rights of Access to Information

Individuals have a right of access to information held by the Charity. Any individual wishing to access his/her personal data should make a request in writing to the Chair of Trustees. The Charity will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, within 28 days for access to records and within 21 days to provide a reply to an "access to information" request. The information will be imparted to the individual as soon as is reasonably possible after it has come to the Charity's attention.

1.1.7. Exemptions

Certain data are exempted from the provisions of the Data Protection Act and the GDPR. These include the following:

- The prevention or detection of crime
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the Charity

1.1.8. Accuracy

The Charity will endeavour to ensure that all personal data held in relation to applicants, beneficiaries, leaders, donors, trustees and other volunteers are accurate. Individuals must notify the Chair of Trustees of any changes to information held about them. An individual has the right to request that inaccurate information about them be erased.

1.1.9. Data Protection Controller

The Charity has appointed the Chair of Trustees as Data Protection Controller. Day-to-day responsibility is undertaken by the Chair of Trustees and by the two Trustees responsible for the nominations process, nominations administration, and the relevant computer input

and paper based handling of the nominations data. They will endeavour to ensure that all personal data are processed in compliance with the principles of the Act as stated above.

1.1.10. Enforcement

If anyone believes that the Charity has not complied with this Policy or acted in accordance with the Act, the individual should inform the Trustees and should also notify the Data Protection Controller appointed by the Charity.

1.1.11. Information Security Policy

Personal or sensitive personal data can only be disclosed to authorised persons on a need to know basis and with the consent of the individuals concerned. No personal or sensitive personal data can be disclosed without authorisation from the Data Protection Officer. All nomination papers, additional information, interview notes and so on will be stored by named trustees and assessors in their homes and will only be accessible to authorised personnel. All information kept on authorised computers will be password-protected. Back up copies of information stored on computers will be made regularly and will be kept in a secure place. Papers sent to interviewers must be kept in a secure place and only accessible to authorised personnel. All such papers will be collected in after the interviews and shredded. Information provided to JoLt doctors and leaders in order that they can carry out their duty of care on expeditions will be destroyed as soon as they are no longer needed. Personal and sensitive personal data will only be kept as long as is necessary. All personnel involved in any way with the handling of personal and sensitive personal data will be trained on JoLt's data protection policies, security systems and procedures. All breaches of security will be investigated, should they occur.

1.1.12. Data Protection - Protection of Personal Data

JoLt is registered with the Information Commissioner's Office.

Data Protection concerns safeguarding data about individuals to maintain their privacy and good information management practice.

Data Protection covers "manual" records - including paper, microfilm, and other media as well as those processed by information technology of any kind.

1.1.13. Data Protection Principles

All trustees, leaders and other volunteers should be aware of the six data protection principles listed above.

1.1.14. Subjects in relation to the processing of personal data.

Personal data is any information about a living identifiable individual. Applicants, beneficiaries, donors, leaders, trustees and other volunteers may make a formal request to the Chair of Trustees for a full copy of their own data. Any person who believes that the Charity holds personal data concerning them can apply for a search and disclosure. Proof of identity may be required. Detailed requirements of the Act can be discussed with the Charity Data Protection Officer, whose name is available from the Chair of Trustees.

1.1.15 Summary:

Treat personal data with care and keep it up to date. Do not pass on personal data to unauthorised persons.