

Rory's Well Data Protection Policy,
including Key Procedures

<p>Aims of this Policy</p>	<p>Rory's Well needs to keep certain information on its, donors, volunteers, service users and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.</p> <p>Rory's Well is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998 and General Data Protection Regulation [GDPR]. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>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 organisation.</p> <p>This policy covers trustees, volunteers and any employed staff.</p>
<p>Definitions</p>	<p>In line with the Data Protection Act 1998 principles, Rory's Well will ensure that personal data will:</p> <ul style="list-style-type: none"> • 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 • Not to be transferred outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. <p>The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.</p> <p>The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.</p> <ul style="list-style-type: none"> • Accountability: those handling personal data follow publicised data principles to help gain public trust and safeguard personal data. • Visibility: Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.

	<ul style="list-style-type: none"> • Consent: The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained. • Access: Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data. • Stewardship: Those collecting personal data have a duty of care to protect this data throughout the data life span.
<p>Type of information processed</p>	<p>Rory's Well processes the following personal information:</p> <ul style="list-style-type: none"> • Name, address telephone number and e-mail address of supporters • If supporter is a UK taxpayer [in order to administer Gift Aid can be reclaimed by Rory's Well] <p>Personal information is kept in the following forms:</p> <ul style="list-style-type: none"> • Maintained on a database • Rory's Well Administrator's One Drive • Hardcopy of completed membership forms held by the Administrator <p>Groups of people within the organisation who will process personal information are:</p> <ul style="list-style-type: none"> • Rory's Well Administrator • Rory's Well Chair of Trustees • Trustees and volunteers where they obtain completed subscription forms from new
<p>Notification</p>	<p>Most organisations that process personal data must notify the Information Commissioners Office [ICO] of certain details about that processing. However, the Act provides exemptions from notification for example some not-for-profit organisations. Based on the ICO self-assessment page Rory's Well do not have to register with the ICO, although it's important that the activities undertaken by Rory's Well adhere to the principles of the Data Protection Act and the Trustees volunteers and Administrator understand best practice for managing information</p>
<p>Responsibilities</p>	<p>Under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In our case this is the Board of Trustees</p> <p>Rory's Well delegates the day to day administration of data processing to the Rory's Well Administrator.</p> <p>Administrator and Chair of Trustees should work together to:</p> <ul style="list-style-type: none"> • understand and communicate obligations under the Act • identify potential problem areas or risks

	<ul style="list-style-type: none"> • produce clear and effective procedures <p>All employed staff, contractors, trustees and volunteers who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.</p>
Policy Implementation	<p>To meet our responsibilities staff, volunteers and trustees will:</p> <ul style="list-style-type: none"> • Ensure any personal data is collected in a fair and lawful way; • Explain why it is needed at the start; • Ensure that only the minimum amount of information needed is collected and used; • Ensure the information used is up to date and accurate; • Review the length of time information is held; • Ensure it is kept safely; • Ensure the rights people have in relation to their personal data can be exercised <p>We will ensure that:</p> <ul style="list-style-type: none"> • Everyone managing and handling personal information is trained to do so. • Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or contractor 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 and politely.
Training	<p>Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:</p> <p>On induction</p> <p>General training/ awareness raising on an annual basis for all staff and trustees and any volunteers who collect supporter data.</p>
Gathering and checking information	<p>Before personal information is collected, we will consider: why the information is being requested and how long the information will be retained</p> <p>We will inform people whose information is gathered about the following via our website:</p> <ul style="list-style-type: none"> • How their information is used • If we share their data and to whom and why • How they can update their information we hold
Data Security	<p>The organisation 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:</p> <ul style="list-style-type: none"> • Limit access to Rory's Well supporter database to small number of trustees and this will be managed by password control

	<ul style="list-style-type: none"> • Only use third party systems software / systems that have industry standard security controls which are validated by for example USA EU Privacy Shield framework. <p>Any unauthorised disclosure of personal data to a third party by an employee; volunteer or trustee may result in the ICO serving Rory's Well with an 'enforcement notice'. This could force Rory's Well to cease processing personal data, or cease processing data in a particular way. The ICO also has the power to issue a financial penalty up to £500,000 in the event of a material breach of the DPA. The GDPR will increase the ICO powers to fine for serious breaches to £17m or 4% of the turnover of the entity whichever is the greater.</p>
Subject Access Requests	<p>Anyone whose personal information we process has the right to know:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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 Rory's Well Administrator, The Keepers, Symn Lane, Wotton under Edge, Glos GL12 7BD</p> <p>Queries about handling personal information will be dealt with swiftly and politely.</p> <p>We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within one month as required by the GDPR from receiving the written request.</p>
Review	<p>This policy will be reviewed at intervals of 5 years to ensure it remains up to date and compliant with the law. Reviewed by Trustees Feb 2022.</p>