



Supporting children and families who are facing loss and surviving bereavement

GDPR Policy

HEADING	SECTION CONTENT
Aims of this Policy	<p>Edward's Trust needs to keep certain information on its trustees, employees, volunteers, service users and supporters to carry out its day to day operations, to meet its objectives and to comply with legal obligations.</p> <p>The organisation is committed to ensuring any personal data will be dealt with in line with GDPR. To comply with the law, personal information will be collected and used fairly, stored safely and confidentially 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 GDPR. This document also highlights key data protection procedures within the organisation.</p> <p>This policy covers trustees, employees, volunteers, service users and supporters.</p>

<p>Definitions</p>	<p>In line with GDPR principles, Edward's Trust 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) <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,</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. • Consent: The collection and use of personal data must be fair and lawful and in accordance with the GDPR's 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>Edward's Trust processes the following personal information: Trustees, employees, volunteers, service users and supporters.</p> <p>Personal information is kept on our Database. This includes employee information – contact details, bank account number and payroll information. This also includes contact details for trustees, other volunteers, service users and supporters</p> <p>Groups of people within the organisation who will process personal information are: employed staff and trustees.</p> <p>All personal and contact details are password protected and access is limited.</p>
<p>Notification</p>	<p>The needs we have for processing personal data are recorded on the public register maintained by the Information Commissioner. We notify and renew our notification on an annual basis as the law requires.</p> <p>If there are any interim changes, these will be notified to the Information Commissioner within 28 days.</p> <p>The job title of the Data Controller within our organisation as specified in our notification to the Information Commissioner is the Chief Executive of Edward's Trust.</p>

<p>Responsibilities</p>	<p>Under the GDPR Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of Edward’s Trust, this is the Board of Trustees.</p> <p>The Board of Trustees delegates tasks to the Data Controller.</p> <p>The Data Controller is responsible for:</p> <ul style="list-style-type: none"> • understanding and communicating obligations under 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 <p>All employed staff and trustees who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.</p> <p>Breach of this policy will result in disciplinary proceedings.</p>
<p>Policy Implementation</p>	<p>To meet our responsibilities trustees, employees and volunteers 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; Our data retention policy currently is as follows: <ul style="list-style-type: none"> - We will retain personal information for a period of 6 months securely in a locked filing cabinet, after which time it will be shredded confidentially, with the exception of individual case notes which will be retained securely for a period of 7 years. In the case of Wellbeing Therapy, the information shared will be kept securely for a period of 7 years. - We will retain our donorflex records for a period of 10 years. • 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 service user, 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 GDPR and how it is followed in this organisation will take the following forms:</p> <p>On induction this policy will be provided along with other policy and procedures documents. Included in employment contracts will be a specific policy statement on Confidentiality.</p> <p>There will be staff training days held approximately twice a year at the Trust and GDPR will form part of the agenda.</p>

<p>Gathering and checking information</p>	<p>Before personal information is collected, we will consider what details are necessary and how long Edward's Trust is likely to need this information.</p> <p>We will inform people whose information is gathered about the following:</p> <ul style="list-style-type: none"> • why the information is being gathered • what the information will be used for • the information will be treated in a confidential manner. <p>We will take the following measures to ensure that personal information kept is accurate:</p> <ul style="list-style-type: none"> • we will update details on a regular basis <p>Personal sensitive information will not be used apart from the exact purpose for which permission was given.</p>
<p>Data Security</p>	<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"> • Lockable drawers with restricted access to keys • Password protection on computer access • Computer system which has restricted access to certain areas • Back up of data.

	<p>Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary proceedings.</p> <p>Any unauthorised disclosure of personal data to a third party by a volunteer or trustee may result in the following:</p> <p>The Board and trustees are accountable for compliance of this policy. A trustee could be personally liable for any penalty arising from a breach that they have made.</p> <p>Any unauthorised disclosure made by a volunteer may result in the termination of the volunteering agreement.</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 GDPR. <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 GDPR 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 the Chief Executive at Edward's Trust.</p>

	<p>The following information will be required before access is granted:</p> <ul style="list-style-type: none"> • Full name and contact details of the person making the request • Their relationship with Edward’s Trust (i.e. former/current member of staff, trustee or other volunteer, service user, legal representative). • Any other relevant information (e.g. timescales involved). <p>We may also require proof of identity before access is granted. The following forms of ID will be required: Passport, Birth Certificate, Driving Licence, confirmation of place of work.</p> <p>Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request.</p>
Review	This policy will be reviewed yearly to ensure it remains up to date and compliant with the law.

YG/10/18