

# HUNTINGDONSHIRE VOLUNTEER CENTRE

## Data Protection Policy

Last updated: 31 October 2023	Next Review Due: 31 October 2024
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### Definitions

<b>Charity</b>	means 'Huntingdonshire Volunteer Centre', a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Mr Mike Baker, HVC Chairman of Trustees

#### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- 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."

## **2. General provisions**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity is established for not-for-profit making purposes and is therefore exempt from registration to the Information Commissioner, provided the Charity only process information for the purposes of:
  - establishing or maintaining membership;
  - supporting a not-for-profit body or association; or
  - providing or administering activities for either the members or those who have regular contact with it.

## **3. Lawful, fair and transparent processing**

The Charity will ensure that all personal data shall be processed fairly and lawfully, i.e. it will only be:

- a. obtained for one or more specific purposes
- b. adequate, relevant and not excessive
- c. accurate and up-to-date
- d. not kept longer than necessary
- e. kept in accordance with the rights of the data subject
- f. protected by reasonable measure
- g. never transferred outside the EU except under certain conditions

## **4. Lawful purposes**

- a. All data processed by the Charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

## **5. Permissions**

The Charity will:

- a. ensure permission is granted before sensitive data is held on:
  - Racial or ethnic origin
  - Religious beliefs
  - Political beliefs
  - Trade union or professional body membership
  - Sexual orientation
- b. ensure permission is granted before passing on information about individuals to organisations
- c. ensure permission is granted before photographs of individuals are used for any purpose
- d. ensure permission is granted before publishing contact details on The Charity's website

The Charity may hold information about organisations or individuals for the purpose of:

- matching volunteers with organisations and volunteer opportunities
- keeping individuals informed about developments/new opportunities
- signposting
- keeping organisations informed about training, events and potential volunteers
- arranging transport

Permission will be obtained before:

- passing personal data on to a third party
- using contact details on a website
- using photographs for any publicity
- storing/processing any sensitive information, e.g. racial or ethnic origin, religion

Data held on monitoring forms will be kept solely for monitoring purposes and will be stored anonymously.

## 6. Accuracy

- The Charity shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## 7. Security

The Charity will:

- ensure that personal data is stored securely using modern software that is kept-up-to-date.
- ensure that paper filing is kept in a secure office and electronic records are kept in a secure location and require some form of password verification to access
- ensure that data will be kept solely for monitoring purposes and will be stored anonymously
- ensure access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- ensure an appropriate back-up and disaster recovery solutions are in place
- discard old personal data by shredding once the relationship has ended unless there is a good reason to keep it (i.e. it meets the purposes above in item 2)
- ensure personal data will be deleted safely such that the data is irrecoverable

## 8. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)). Please refer to our Data Breach Policy for more information.

*This policy was approved by the Trustees of Huntingdonshire Volunteer Centre*

Signed: *Mike Baker* Chairman

Date: *31st October 2023* Date of Next Review: *31/10/2024*