



## **Cary Cares: Data Protection Policy**

**This policy refers to and should be read in conjunction with all other Cary Cares policy documents.**

### **1. Definitions**

- 1.1. 'Personal data' is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.
- 1.2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.
- 1.3. In the context of this document 'we' refers to the trustees and volunteers of Cary Cares.

### **2. Responsibility**

- 2.1. Overall and final responsibility for data protection lies with the trustees of Cary Cares, who are responsible for overseeing activities and ensuring this policy is upheld.
- 2.2. All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group. New volunteers should have an opportunity to read this policy before the commence any work for Cary Cares.

### **3. Overall policy statement**

- 3.1. Cary Cares needs to keep personal data about its trustees, volunteers, clients and supporters in order to carry out its support work in the communities of Castle Cary and Ansford.
- 3.2. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
- 3.3. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

3.4. We will only collect, store and use data for:

- 3.4.1. purposes for which the individual has given explicit consent, or
- 3.4.2. purposes that are in Cary Cares' legitimate interests, or
- 3.4.3. contracts or agreements with the individual whose data it is, or
- 3.4.4. to comply with legal obligations, or
- 3.4.5. to protect someone's life, or

3.5. We will provide individuals with details of the data we have about them when requested by the relevant individual.

3.6. We will delete data if requested by the relevant individual unless we need to keep it for legal reasons.

3.7. We will endeavour to keep personal data up-to-date and accurate.

3.8. We will store personal data securely.

3.9. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

3.10. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so. In the case of people under 13 years, a parent or guardian's consent must be gained.

3.11. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

3.12. To uphold this policy, we will maintain a set of data protection procedures (below) for our trustees and volunteers to follow.

#### **4. Cary Cares data protection procedures**

##### **4.1. Introduction**

4.1.1. Cary Cares has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

4.1.2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases, we will ensure our Data Protection Policy is upheld.

##### **4.2. General procedures**

- 4.2.1. Data will be stored securely. When it is stored electronically, it will be kept in password protected files on Google Drive. When it is stored on paper it will be filed carefully in a secured area.
- 4.2.2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
- 4.2.3. We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

## **5. Mailing list**

- 5.1. We will maintain a mailing list on secure servers. This will include the names and contact details of people who wish to receive publicity and fundraising appeals from Cary Cares.
- 5.2. When people sign up to the list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give consent to receive publicity and fundraising messages, and will only send them messages which they have expressly consented to receive.
- 5.3. We will not use the mailing list in any way that the individuals on it have not explicitly consented to.
- 5.4. We will provide information about how to be removed from the mailing list with every mailing.

## **6. Supporting individuals**

- 6.1. From time to time, individuals contact the Group to ask us to help them resolve an issue they are having with a third party, for example an electricity provider or local council
- 6.2. We will request explicit, signed consent before sharing any personal details with the council or any other relevant third party.
- 6.3. We will not keep information relating to an individual's personal situation for any longer than is necessary for the purpose of providing them with the support they have requested.
- 6.4. Personal data relating to support issues will be stored securely by a member of the trustees, and not shared among the rest of the committee or with other volunteers unless necessary for the purpose of providing the support requested.
- 6.5. Details relating to individual's circumstances will be treated as strictly confidential and will only be shared with the explicit consent of the individual concerned and for the purposes of providing ongoing support.

## **7. Fundraising**

- 7.1. Cary Cares may appeal directly or indirectly to individuals, businesses or organisations. As a result, it may be necessary for Cary Cares to be provided with personal information related

to donations made or funds raised for Cary Cares.

- 7.2. This information will only be used for the purposes of ensuring that any funds received are correctly attributed and accounted for. Where possible this information will be used by the treasurer only. In some circumstances i.e. auditing, financial reconciliation, it may be necessary for other volunteers to see this information. This will only be done if the information is crucial to the role of the volunteer (for example to reconcile donations or orders).
- 7.3. Donors, supporters or clients may be asked if they wish to be added to our mailing list as a result of their donations. If this is the case, all donors will be made aware of how to opt-out of future mailings.
- 7.4. Social Media may be used to promote fundraising or other activities of Cary Cares. Where named individuals, either in text or in image/video are mentioned, explicit consent will be sought before any material is posted online. Cary Cares will only use images/video/information provided by volunteers/clients/supporters for the purposes of promotion of Cary Cares and its work. Any individual can request for social media posts to be amended/removed if they believe that their permission was not given.

## **8. Contacting volunteers**

- 8.1. Local people in Castle Cary, Ansford and surrounding areas volunteer for Cary Cares in a number of ways.
- 8.2. We will maintain a list of contact details of our recent volunteers. We will share volunteering opportunities and requests for help with the people on this list, by email, social media or direct messaging groups like WhatsApp.
- 8.3. People will be removed from the list if they have not volunteered for the group for 12 months.
- 8.4. All volunteers will have an opportunity to read this policy which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.
- 8.5. To allow volunteers to work together to organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

## **9. Disclosure and Barring Service checks – see Safeguarding and DBS policy.**

- 9.1. It is expected that any volunteer who provides services in the name of Cary Cares will undergo any relevant DBS check, depending on the type of role that they will undertake. Data related to these checks will be used only for the purposes of obtaining the necessary checks.

9.2. Only information that is legally required to be retained by Cary Cares will be kept following the checking process. In the instance that a DBS check shows that a volunteer is not suitable to work with Cary Cares, this will be communicated to the individual concerned. No information relating to, for example, criminal convictions, will be kept in the long term.

#### **10. Contacting Committee members**

10.1. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

10.2. Committee contact details will be shared among the committee.

10.3. Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than Cary Cares business, without explicit consent.

#### **11. Monitoring and Review**

11.1. Cary Cares' board of trustees is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

11.2. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

11.3. Any need for improvements will be applied as soon as possible. Volunteers are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the board of trustees.

11.4. This policy shall be reviewed at least once in every 2 years from the date the policy is ratified.