Connecting Boroughs

Data Protection & UK GDPR Policy

Charity Number: 1211291

Policy Owner: Connecting Boroughs CIO

Approved by: Board of Trustees

Review Frequency: Annually, or sooner where required

Next Review: September 2027

1. Policy Statement

Connecting Boroughs is committed to protecting personal information and respecting the privacy of beneficiaries, children and families, volunteers, trustees, staff, donors, supporters, partners and other individuals whose information we handle.

We will handle personal data lawfully, fairly, transparently and securely, and only use information where there is an appropriate reason to do so.

2. Purpose

This policy explains how Connecting Boroughs will collect, use, store, share, retain and dispose of personal information and how we will respond to data protection concerns.

- protect the privacy and rights of individuals;
- ensure personal information is used only for appropriate charitable and operational purposes;
- reduce the risk of loss, misuse, unauthorised access or inappropriate disclosure;
- ensure sensitive and safeguarding information receives appropriate protection; and
- provide clear responsibilities for trustees, staff and volunteers.

3. Scope

This policy applies to trustees, staff, volunteers and anyone handling personal information on behalf of Connecting Boroughs.

It applies to information held electronically, on paper, in emails, messages, forms, photographs, videos, spreadsheets, databases and other records.

4. Data Protection Principles

Connecting Boroughs will seek to ensure that personal data is:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up to date where necessary;
- kept for no longer than necessary;
- handled securely and protected against unauthorised or unlawful processing, accidental loss, destruction or damage; and
- managed in a way that enables the charity to demonstrate appropriate accountability.

5. Information We May Hold

Depending on the services or activities involved, Connecting Boroughs may hold information such as:

- names and contact details;
- dates of birth and age information;
- parent, carer or emergency contact details;
- information required to provide charitable support;
- attendance and participation records;
- housing or financial circumstances where relevant to support being provided;
- health, disability, SEND or accessibility information where necessary;
- information relating to domestic abuse, safeguarding or welfare concerns;
- photographs or video where appropriate permissions or another lawful basis applies;
- volunteer, trustee and staff records;
- DBS and safer recruitment information where appropriate; and
- donor, supporter and partner information.

We will avoid collecting information that is not reasonably required for our work.

6. Lawful Use of Personal Information

Before processing personal data, Connecting Boroughs will identify an appropriate lawful basis. Depending on the circumstances, this may include consent, contractual necessity, legal obligation, vital interests, legitimate interests or the performance of a task in the public interest where applicable.

Where special category data is processed, an appropriate additional condition will also be identified.

Consent will not be treated as the only possible basis for processing, particularly where safeguarding or legal responsibilities require information to be used or shared.

7. Children and Vulnerable Beneficiaries

Connecting Boroughs recognises that information about children, adults at risk and people experiencing domestic abuse may be particularly sensitive.

Access to such information will be restricted to people who need it for their role.

Information should not be discussed in public areas or shared through personal or informal channels where this would create an unnecessary privacy or safeguarding risk.

8. Safeguarding and Information Sharing

Confidentiality is important but is not absolute. Information may need to be shared without consent where this is necessary and lawful to protect a child or adult from serious harm, respond to a safeguarding concern, comply with a legal obligation or support an emergency response.

Where possible and appropriate, individuals should be informed about how their information will be used and shared.

Safeguarding information must be handled in accordance with Connecting Boroughs' Safeguarding Policy and related procedures.

9. Collecting Information

When personal information is collected, Connecting Boroughs should provide appropriate privacy information explaining how the information will be used, where required.

Only information reasonably necessary for the relevant activity, service or legal requirement should be collected.

10. Storage and Security

Personal information must be stored securely and protected from inappropriate access, alteration, disclosure or loss.

- paper records containing sensitive information should be kept securely;
- electronic devices and accounts should use appropriate passwords or access controls;
- confidential records should only be accessible to authorised people;
- personal information should not be left unattended in public or shared spaces;
- sensitive information should not be unnecessarily copied or distributed; and
- records should be securely destroyed or deleted when they are no longer required.

11. Email, Messaging and Digital Communication

Staff, volunteers and trustees must take reasonable care when sending personal information by email or messaging services.

Recipients should be checked before information is sent, and sensitive information should only be shared where necessary and through an appropriate method.

Personal information about beneficiaries should not be placed in large community messaging groups or social media channels unless there is a clear, appropriate and lawful reason.

12. Photographs and Video

Connecting Boroughs may take photographs or video at activities and events for appropriate charitable purposes.

Where consent is relied upon, appropriate consent should be obtained and recorded, particularly for identifiable children.

Images must not be used in a way that creates an unreasonable safeguarding, dignity or privacy risk.

More detailed requirements may be set out in the charity's Photography, Video and Consent Policy.

13. Sharing Information with Other Organisations

Personal information may be shared with partner organisations, local authorities, emergency services, healthcare professionals, safeguarding agencies or other organisations where there is an appropriate and lawful reason.

Only information necessary for the purpose should normally be shared.

Where appropriate, Connecting Boroughs will use suitable data-sharing or confidentiality arrangements with partner organisations.

14. Individual Rights

Individuals may have rights under data protection law in relation to their personal information, including rights relating to access, correction, deletion, restriction, objection and data portability, depending on the circumstances.

Requests relating to personal data should be passed promptly to the person responsible for data protection so that applicable legal timescales can be met.

The identity of the person making a request may need to be verified before information is released.

15. Data Retention and Disposal

Personal information will not be retained indefinitely simply because it may be useful in the future.

Connecting Boroughs will determine appropriate retention periods having regard to the purpose of the record, safeguarding requirements, legal obligations, funding requirements and operational needs.

When information is no longer required, it should be securely deleted, shredded or otherwise destroyed.

16. Personal Data Breaches

A personal data breach may include loss, destruction, alteration, unauthorised disclosure of or unauthorised access to personal information.

Any suspected breach must be reported immediately to the person responsible for data protection.

- the circumstances of the breach should be recorded;
- steps should be taken promptly to contain and reduce any harm;
- the risks to affected individuals should be assessed;
- trustees and other responsible persons should be informed where appropriate; and
- where legally required, the Information Commissioner's Office and/or affected individuals will be notified within the applicable timescale.

17. Responsibilities

Board of Trustees

The trustees retain overall responsibility for ensuring that Connecting Boroughs has appropriate arrangements for data protection and information governance.

Founder/CEO and Designated Data Protection Lead

The person responsible for day-to-day data protection will oversee implementation of this policy, respond to concerns and requests, maintain appropriate records and escalate significant matters to the trustees.

Staff and Volunteers

Everyone handling information on behalf of Connecting Boroughs must follow this policy, maintain confidentiality, use information only for legitimate purposes and report any loss, breach or concern immediately.

18. Training and Awareness

Relevant staff and volunteers will receive appropriate information or training on confidentiality, data protection, secure information handling and reporting data breaches.

Additional guidance should be provided to people handling safeguarding records or other particularly sensitive information.

19. Related Policies

This policy should be read alongside the charity's:

- Safeguarding Policy;
- Risk Management Framework;
- Governance and Decision-Making Framework;
- Confidentiality and Privacy Policy;
- Photography, Video and Consent Policy;
- Information Sharing and Record-Keeping Policy; and
- Serious Incident Reporting Policy.

20. Monitoring and Review

This policy will be reviewed by the trustees at least annually and sooner where there are significant changes to the charity's activities, data protection requirements or following a significant data incident.

Approved by the Board of Trustees: _____

Date approved: _____

Signed on behalf of the trustees: _____

Next review date: _____