# Data Protection Policy
*CLASS Policy Framework*

**Adopted on:** 12 November 2020
**Most recent review:** 23 April 2024
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## 1. Introduction

CLASS needs to gather and use certain information about individuals. These can include savings group members, community leaders from different associations, partner organisations and potential partners, volunteers, trustees, professionals we have worked with, funders, and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored.

## 2. Purpose and scope of this policy

This policy helps CLASS to ensure that we are:

- Compliant with data protection law (including the General Data Protection Regulations – GDPR) and following good practice;
- Protecting the rights of staff, customers and partners;
- Open about how we store and process individual data;
- Protecting ourselves against any risks of data breach.

As a matter of good practice, other organisations and individuals working with the organisation, and who have access to personal information, will be expected to have read and comply with this policy. It is expected that any staff who deal with external organisations will take responsibility for ensuring that such organisations agree to abide by this policy.

## 3. Roles and Responsibilities

Everyone who works for or with CLASS has some responsibility for ensuring data is collected, stored and handled appropriately. However, these people have particular areas of responsibility:

- The board of trustees is ultimately responsible for ensuring that CLASS meets its legal obligations

- The data protection officer is responsible for:
  - Keeping the board up to date about data protection responsibilities, risks and issues

- Ensuring the board reviews all data protection procedures and related policies annually
- Arranging data protection training for staff and volunteers
- Handling data protection questions from staff and anyone else covered by this policy
- Dealing with requests from individuals to see the data CLASS holds about them
- Checking and approving any contracts or agreements with third parties that may involve the handling of sensitive data
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Approving data protection statements attached to communications

## 4. Purpose of data held by CLASS

Data may be held by us for the following purposes:

- Staff and consultant administration
- Volunteers
- Project beneficiaries/participants
- Fundraising
- Realising the objectives of our charitable organisation
- Accounts & record-keeping
- Advertising, marketing & public relations
- Information and databank administration
- Media work
- Research

## 5. Data Protection Principles

CLASS will ensure that we abide by the following principles:

**5.1 Fairly and lawfully processed personal data:**
We will always put our logo on all paperwork, stating our intentions on processing the data and state if, and to whom, we intend to give the personal data. We will also provide details of the duration the data will be kept and the lawful basis for processing the data. Individuals will be informed that they have a right to complain to the Information Commissioners Office (ICO) if they think there is a problem with the way CLASS are handling data.

**5.2 Processed for limited purpose:**
We will not use data for a purpose other than those agreed by data subjects. If the data held by us are requested by external organisations for any reason, this will only be passed if data subjects agree. Also external organisations must state the purpose of processing, agree not to copy the data for further use and sign a contract agreeing to abide by GDPR, Data Protection Act 1998 and CLASS's Data Protection Policy.

**5.3 Adequate, relevant and not excessive:**
We will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held. If data given

or obtained are excessive for such purpose, they will be immediately deleted or destroyed.

**5.4 Accurate and up-to-date:**
At yearly intervals will review our data. All amendments will be made immediately and data no longer required will be deleted or destroyed. Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets. CLASS will make it easy for data subjects to update the information we hold on them.

**5.6 Not kept longer than necessary:**
We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us after one year of non-usage unless otherwise agreed by data subjects.

Data Protection Information

**5.7 Processed in accordance with the individual's rights:**
All individuals that CLASS hold data on have the right:
- to be informed
- to access
- to rectification
- to erasure
- to restrict processing
- to data portability
- to object; and
- to not be subject to automated decision-making including profiling

**5.8 Subject access requests**

If an individual contacts the company requesting their information, this is called a subject access request. Subject access requests from individuals should be made by email, addressed to the data protection officer at sophiek.class@gmail.com. The data protection officer can supply a standard request form (appendix 1), although individuals do not have to use this.

The data protection officer will aim to provide the relevant data within 1 month. The data protection officer will always verify the identity of anyone making a subject access request before handing over any information. When the requested information is not held, we will inform the applicant in writing, as soon as possible, but in any case by the due date.

**5.9 Secure**
When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it. When not required, the paper or files should be kept in a locked drawer or filing cabinet. Employees should make sure paper and printouts are not left where unauthorised people could see them. Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. Data should be protected by

strong passwords that are changed regularly and never shared. If data is stored on removable media, these should be kept locked away securely when not used. Data should only be stored on designated drives and servers and only uploaded to approved cloud computing services. Servers containing personal data should be sited in secure locations. Data should be backed up frequently. Data should never be saved directly to laptops or other mobile devised. All servers and computers containing data should be protected by approved software.

In the event that CLASS suffers a personal data breach, the board of trustees will be informed. They will conduct an investigation and notify the ICO and the individuals affected.

**5.10 Not transferred to countries outside the European Economic Area**
Data must not be transferred to countries outside the European Economic Area without the explicit consent of the individual. CLASS takes particular care to be aware of this when publishing information on the Internet, which can be accessed from anywhere in the globe. This is because transfer includes placing data on a website that can be accessed from outside the European Economic Area.

## 6. Disclosing Data to law enforcement agencies

The Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, CLASS will disclose requested data. However, the data protection officer will ensure the request is legitimate, seeking assistance from the board of trustees and from legal advisers where necessary.

## 7. Guidelines for staff and volunteers

- The only people able to access data covered by this policy should be those who need it for their work
- Data should not be shared informally. When access to confidential information is required, employees and volunteers can request it from the data protection officer
- CLASS will provide briefings to all employees and volunteers to help them understand their responsibilities when handling data
- Employees should keep all data secure, by taking sensible precautions and following the guidance below:
    - Strong passwords must be used, changed regularly, and never shared
    - Personal data should not be disclosed to unauthorised people, either internally or externally
    - Data should be reviewed regularly and updated if found to be out of date. If no longer required, it should be deleted or disposed of.
    - When working with personal data, employees should ensure the screens of their computers are always locked when unattended.
    - Personal data should never be sent by email as this is unsecure.
    - Data must be encrypted before being transferred electronically.

- Personal data must never be transferred outside the European Economic Area.
- Employees should not save copies of personal data to their own computers.

## Appendix 1 CLASS: Personal data request (Subject access form)

You should complete this form if you want us to supply you with a copy of any personal data we hold about you. We will also provide you with information about any processing of your personal data this is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exists.

We will respond within 1 month of the following:

Our receipt of your written request; or
Our receipt of any further information we may ask you to provide to enable us to comply with your request.

**Details of person requesting information:**

Full name:
Address:

Contact telephone number:
Email address:

Are you the data subject?
- Yes - I have enclosed proof of my identity and address
- No - I am acting on behalf of a data subject. I have enclosed the data subject's written authority and proof of the data subjects identity and my own identity.

Proof of identity = Passport, driving license, national identity card, birth certificate
Proof of address = Utility bill, bank statement, driving license, TV license, tax bill

**Details of data subject if different from above:**

Full name:
Address:

Contact telephone number:
Email address:

**What information are you seeking?**

Please describe the information you are seeking and provide any relevant details you think will help us to identify the information you require:

If you want information about any of the following, please let us know:

- Why we are processing your personal data
- To whom your personal data are disclosed
- To source your personal data

Please note that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to CLASS is true. I understand that it is necessary for CLASS to confirm my / the data subjects identity and it may be necessary to obtain more detailed information in order to locate the correct data.

Signed _____

Date_____

Please return the completed form to contactus@class-uk.com