

AGE UK EXETER

Controlled Document

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Owner (Responsibility) CEO

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Document location: www.ageuk.org.uk/exeter/about-us/policiesandguidelines

Document Description

This document outlines our legal requirements under the General Data Protection Regulations and the processes by which Age UK Exeter meets them.

Implementation and Quality Assurance

Implementation is immediate and this Policy shall stay in force until any alterations are formally agreed.

The Policy will be reviewed every three years by the Board of Trustees, sooner if legislation, best practice, or other circumstances indicate this is necessary.

All aspects of this Policy shall be open to review at any time. If you have any comments or suggestions on the content of this policy, please contact the CEO on info@ageukexeter.org.uk or at Age UK Exeter, The Sycamores, Mount Pleasant Road, Exeter, EX4 7AE, 01392 202092.

Data Protection Policy

1. Introduction

Data protection is about ensuring people can trust organisations to use their data fairly, responsibly, and transparently. The UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018, applies to processing carried out by organisations operating within the UK. The Information Commissioners Office (ICO) regulates data protection in the UK.

The following is not a definitive statement on the Act but seeks to interpret relevant points where they affect Age UK Exeter.

The Act covers both written and computerised information and the individual's right to see such records.

It is important to note that the Act covers all records relating to clients, staff, and volunteers.

All Age UK Exeter staff and volunteers are required to follow this Data Protection Policy and Procedures. Failure to do so may lead to disciplinary action.

The Chief Executive has overall responsibility for data protection within Age UK Exeter, but each individual processing data is acting on the controller's behalf and therefore has a legal obligation to adhere to the Regulations.

2. Definitions

Processing of information – how information is held and managed.

Data Subject – used to denote an individual about whom data is held.

Data Controller – used to denote the entity with overall responsibility for data collection and management. Age UK Exeter is the data controller for the purposes of the Act.

Data Processor – an individual handling or processing data.

Personal data – any information about a particular living individual which can identify who they are. This might be anyone, including a customer, client, employee, partner, member, supporter, business contact, public official, or member of the public.

Special categories of personal data – Some of the personal data processed can be more sensitive in nature and therefore requires a higher level of protection. The GDPR refers to the processing of these data as 'special categories of personal data'. This means personal data about an individual's:

- race
- ethnic origin
- political opinions

- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data
- health data
- sex life or sexual orientation

3. Data Protection Principles

The UK GDPR sets out seven key principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

These principles should lie at the heart of our approach to processing personal data.

Article 5(1) requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency')
- 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 ('purpose limitation')
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- accurate and, where necessary, kept up to date or erased or rectified without delay ('accuracy')
- 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 ('storage limitation')
- 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 ('integrity and confidentiality').

Article 5(2) adds that:

- The controller shall be responsible for and be able to demonstrate compliance with the GDPR ('accountability').

These principles lie at the heart of UK GDPR. They don't give exact rules or numerical guidelines, but rather embody the spirit of the general data protection regime and it is up to individual organisations to interpret them for practice and define their lawful basis for processing.

4. Individual's Rights

The UK GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

5. Procedures

Lawful Basis

At Age UK Exeter, our lawful basis for processing information is:

- Legitimate Interests, and
- Consent

Please see our legitimate interests assessments/log in Appendix 2.

Consent

Consent means giving individuals real choice and control. It must be explicit, specific and requires a positive opt-in. An organisation must keep their consent requests separate from other things and keep an evidence trail of decisions. It must be easy to withdraw consent if an individual wants to.

Obtaining Consent

Consent can be obtained in several ways depending on the nature of the interaction. Best practice is to obtain consent at the beginning of an exchange, but if this is not viable, it can be obtained at the next appropriate meeting, if a decision is not vital and can be postponed. Though written consent is the optimum, verbal consent can be taken if the situation means it is the only viable option and if an accurate, dated evidence trail is kept. Consent obtained for one purpose cannot automatically be applied to all uses.

At Age UK Exeter we have a General Data Protection Consent Form that covers, legitimate interests to store, consent to share, consent to contact next of kin in an emergency, and consent for mailings. We also have a Photography Consent Form that covers photography, videography, and case studies. Such media could be used for, but not limited to, publicity material, press releases, social media, and our website. If the subject is less than 18 years of age, then parental/guardian consent should be sought. Photography consent lasts for two years from when it is given. Individuals have a right to withdraw consent at any time. If this affects the provision of a service(s) by Age UK Exeter, then the Service Co-ordinator should discuss this with the CEO at the earliest opportunity.

Consent and mental capacity

In most circumstances, Age UK Exeter's General Data Consent Form will be used to obtain consent. A relative, carer, trusted individual or Age UK Exeter member of staff can assist with this if they are comfortable the client has capacity. The form can be marked as a signature in any way that authorises consent and denotes understanding. In compliance with the Mental Capacity Act (MCA), Age UK Exeter understands that capacity is time and decision specific and therefore if a decision is not urgent, it may be that the person will have capacity to make the decision at another point in time. Age UK Exeter will always seek to empower and listen to the individual and allow them to give consent if possible. Verbal consent can also be recorded if the only viable option.

For our Information and Advice Service, Lasting Power of Attorney's will need to be seen if a request is made to process an individual's personal information on their behalf.

To deliver a service, in line with the MCA, if consent cannot be sought and a decision is vital, the family, carers or trusted individuals will be consulted, and a decision made whether to offer the least restrictive option in the person's best interests. Good documentation of all decisions of this kind must be kept. Please see our Mental Capacity Act Policy for further information.

6. Ensuring the Security of Personal Information

It is an offence to disclose personal information 'knowingly and recklessly' to third

parties. Every care is taken within the organisation to ensure data security as detailed in the sections below. All personal data is treated as confidential and only shared with outside agencies if express consent has been given to do so. Special categories data is treated with the utmost care and only stored on our main secure database (Charitylog) or securely on a home support workers work mobile phone (client information sheets), password protected. Personal information would only be shared without consent if it related to criminal proceedings or a safeguarding issue and then only on the express permission of the Chief Executive Officer and Service Manager.

Personal information should only be communicated within Age UK Exeter's staff and volunteer team on a strict need to know basis. Care should be taken with those conversations containing personal or special categories of personal information that they are not overheard by people who should not have access to that information.

7. Monitoring

Age UK Exeter wishes to be an inclusive organisation. For Age UK Exeter to monitor how well our staff, volunteers and service users reflect the diversity of the local community we request that they complete an Equality and Diversity Monitoring form. The completion of the form is voluntary, although strongly encouraged. Responses are securely stored and held on a passworded database for statistical and monitoring purposes.

8. Use of Files, Books and Paper Records

To prevent unauthorised access or accidental loss or damage to personal information, it is important that care is taken to protect personal data. Paper records should be kept in locked cabinets/drawers overnight and care should be taken that personal and special categories of personal information is not left unattended and in clear view during the working day. If work involves a staff member having personal /and/or special categories of personal data at home or in their car, the same care needs to be taken. Any breaches must be reported to the Governance Officer as detailed below.

9. Disposal of Scrap Paper, Printing or Photocopying Overruns

Care must be taken that names/addresses/phone numbers and other information written on scrap paper are also considered to be confidential. Staff must not keep or use any scrap paper that contains personal information but ensure that it is confidentially shredded.

Age UK Exeter has a contract with Paperchain, an organisation that supplies confidential waste services to destroy confidential waste. Certificates of Destruction are issued after every collection and can be viewed in the Data Protection file in the Admin Office.

If staff are transferring papers from home, or from a client's home to the office for shredding this should be done as soon as possible and not left in a car for a period. When transporting documents, they should be carried out of sight and treated as confidential material.

10. Computers

Where computers are networked, access to personal and special categories of personal information is restricted by password to authorised personnel only.

Firewalls and virus protection is to be always employed to reduce the possibility of hackers accessing our system and thereby obtaining access to confidential records.

Documents should only be stored in Teams or on cloud-based systems and not on individual computers.

Where computers or other mobile devices are taken for use off the premises the device must be password protected. Care should be taken when staff work from home, that they protect confidential information and documents.

11. Cloud Computing and Databases

When commissioning cloud-based systems, Age UK Exeter will satisfy themselves as to the compliance with data protection principles and robustness of the cloud-based providers.

Age UK Exeter currently uses two cloud-based data management systems to hold and manage information about its service users and donors/supporters. All staff also utilise Microsoft Teams for communications and file sharing.

Charitylog

Charitylog, hosted by Dizions Ltd, holds data about our service users, volunteers, and staff. Access is password protected and restricted to named users, with levels of access for each user set to a 'need to know' basis appropriate to their job. Charitylog is accredited to ISO 27001:2013 Information Security standard. They are also accredited to the International Quality Management Standard ISO 9001:2008 and are registered with the Information Commissioners Office. Charitylog is also signed up to Cyber Plus Essentials. As such Age UK Exeter is satisfied with the security levels in place to protect its data.

ETapestry

ETapestry hosted by Blackbaud Solutions, holds data about Age UK Exeter's supporters and donors, including information about donations received. Access is password protected and restricted to named users. Blackbaud is headquartered in the United States of America and Age UK Exeter's data may be stored and maintained in a secure database in the United States. Age UK Exeter have satisfied themselves that Blackbaud have signed up to

the EU-US Privacy Shield which is approved by the Information Commissioners Office as being compatible with the UK data protection regulations.

12. Direct Marketing

Direct Marketing is a communication that seeks to elicit a measurable fundraising response (such as a donation, a visit to a website, sign up to Gift Aid, etc). The communication may be in any of a variety of formats including mail, telemarketing, and email. The responses will be recorded to inform the next communication. Age UK Exeter will not share or sell its database(s) with outside organisations.

Age UK Exeter holds information on staff, volunteers, clients, and other supporters, to whom we will from time to time send copies of our newsletters, services and details of other activities or fundraising requests/events that may be of interest to them. Specific consent to contact will be sought from our clients and other supporters, including which formats they prefer (e.g. mail, email, phone etc) and any accessibility requirements an individual may have before making communications.

We recognise that clients, staff, volunteers, and supporters for whom we hold records have the right to unsubscribe from our mailing lists. This wish will be recorded on their personnel record, and they will be excluded from future contacts.

13. Privacy Statements

An Organisational Privacy Statement will be published on our website. Please see copy in Appendix 1.

All clients will receive a summary Privacy Notice when their consents are obtained. This notice will explain what information we hold and why.

Staff and volunteers will receive a detailed Privacy Notice upon appointment explaining the various pieces of information held and why.

14. Disclosure and Barring Service

For staff and volunteers who are regularly involved with vulnerable adults, it will be necessary for Age UK Exeter to apply to the Disclosure & Barring Service (DBS) to request a disclosure of spent and unspent convictions, as well as cautions, reprimands and final warnings held on the police national computer. All Age UK Exeter trustees will also be subject to DBS checks. Any information obtained will be dealt with under the strict terms of the DBS Code. Access to the disclosure reports is limited to the CEO and Service Manager. If there is a positive disclosure the Chief Executive will discuss this, anonymously, with the Chair of the Risk and Quality Committee, Service Manager, and our insurers to assess the

risk of appointment. Trustees and insurers should not see the report itself. Please refer to our Policy on the Disclosure & Barring Service. Staff and volunteers who are subject to DBS checks, must disclose any convictions, cautions, reprimands, and final warnings which are issued to them after the DBS check has taken place.

15. Confidentiality

Further guidance regarding confidentiality issues can be found in our Confidentiality Policy. When working from home, or from some other off-site location, all data protection and confidentiality principles still apply. All electronic data, e.g., documents and programmes related to work for Age UK Exeter should not be stored on any external hard disk or on a personal computer. All staff have access to Microsoft Teams and should be able to work safely and securely from home if necessary.

When using text messages to communicate with staff it is important to consider the possibility that someone else may read a text message that is sent regarding a client (e.g. a family member, the phone may be passed on, sold, or stolen and end up in the possession of someone else). Consider what information it is appropriate to include, only the minimum amount of personal data for the purpose should be communicated via text. Best practice would be to use charitylog number, but if not possible, first name and initial of surname should be used rather than using client's full name. Texts should be regularly deleted from a device and mobile phones should be password protected.

When sending emails or other electronic communications to outside organisations, e.g., social worker or hospital staff, care should be taken to ensure that any identifying data is removed and that codes (e.g. initials or identifying code number, such as social services number) are used where possible. Confidential and/or special categories of personal information should be written in a separate document which should be password protected before sending. Wherever possible, this document should be 'watermarked' confidential.

Any paperwork kept away from the office (e.g. clients care plan kept at home) should be treated as confidential and kept securely as if it were held in the office. Home support workers are provided with a black folder to keep these in. Documents should not be kept in open view (e.g. on a desktop) but kept in a file in a locked drawer or filing cabinet.

Home support workers will only receive client information in password protected emails/files and these should be deleted as soon as advised to do so.

16. Retention of Records

We have a detailed Age UK Exeter Data Retention Schedule (please see separate document). All data will be cleansed after the appropriate timescale.

17. What to Do If There Is a Breach

If a staff member or volunteer discovers, or suspects, a data protection breach they should report this to their line manager who will inform the Governance Officer and review our systems in conjunction with the CEO to prevent a reoccurrence. The Governance Officer and CEO will consider the nature of the breach, undertake accurate recording, and determine whether it needs to be reported to the Board of Trustees and Information Commissioners Office (ICO). Significant breaches must be reported to the ICO within 72 hours.

In the event that the breach involves clients receiving a service commissioned by Devon County Council or the NHS, the commissioning authority should be informed by the Chief Executive or Services Manager by emailing keepdevonsdatasafe@devon.gov.uk or by phoning the commissioner's Information Governance Team.

Any deliberate or reckless breach of this Data Protection Policy by an employee or volunteer may result in disciplinary action which may result in dismissal.

18. Subject Access Requests (SARs)

Data subjects can ask, in writing to the Chief Executive, to see all personal data held on them, including e-mails and computer or paper files. The Data Processor (Age UK Exeter) must comply with such requests within 30 days of receipt of the written request and keep adequate records of all proceedings.

19. Powers of the Information Commissioner

The following are criminal offences, which could give rise to a fine and/or prison sentence.

- The unlawful obtaining of personal data.
- The unlawful selling of personal data.
- The unlawful disclosure of personal data to unauthorised persons.

Further Information

Further information is available at www.ico.org.uk

Details of the Information Commissioner

The Information Commissioner's office is at:

Wycliffe House
Water Lane

Wilmslow
Cheshire SK9 5AF

Data Protection Help Line: 0303 123 1113

Or use their live chat service at www.ico.org.uk

Revision History

Revision date	Summary of Changes	Other Comments
14 May 2019	Approved by Board of Trustees	
May 2021	Internal review	
November 2022	Update with attention to ICO, including Legitimate Interests Assessments, Privacy Statement, and separate creation of Data Retention Schedule	

Appendix one

Age UK Exeter Organisational Privacy Notice

Age UK Exeter is a local charity that has worked across Exeter for over 30 years. Our mission is to enable older people to make the most of life, whatever their circumstances.

Our contact details:

Sycamores, Mount Pleasant Road, Exeter, EX4 7AE.

Telephone: 01392 202092

Email: Info@ageukexeter.org.uk

What type of information we have:

We collect and process personal information relating to clients, supporters, staff, volunteers, and trustees of our organisation. This may include personal identifiers, contacts and characteristics and include service history and/or services accessed and medical information if appropriate. This is to allow us to offer services, products, help and guidance to our clients and to be able to keep people up to date with our work and plans.

How we get the information and why do we have it:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You give us your information so that we can provide a service to you
- You give it so we can fulfil a request
- So that you can support us
- Because you would like to receive communications from us
- You would like to become a staff member, volunteer, supporter, or trustee

We may also receive information indirectly, for example, if you are referred to one of our services.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Legitimate Interests
- Consent

Please note, you can withdraw your consent at any time by contacting info@ageukexeter.org.uk or telephoning 01392 202092

What we do with the information we have:

We use the information that you have given us in order to deliver services to you, fulfil your request to us, provide you with information or advice or to keep you up to date with the charity, fundraising and our plans and developments.

We will only share your details with other agencies if express consent has been given or if there is a safeguarding concern or an offence has been committed. Then and only then, we would have to share information with the advice and authorisation of our Chief Executive Officer.

How we store your information:

Your information is stored securely by us on CharityLog, our online database hosted by Dizons Ltd.

If you are in receipt of one or more of our services, have worked or volunteered for us, we will hold your data for six years after you cease to receive a service or work for us.

If you are a supporter of Age UK Exeter, we will hold information about your donations for six years after you stop supporting us or as soon as you withdraw consent or ask to be forgotten, we will anonymise your data.

You can see full information about our data retention in our Data Protection Policy available at www.ageuk.org.uk/exeter/about-us/policiesandguidelines or by requesting a copy of our Data Retention Schedule.

Your data protection rights:

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@ageukexeter.org.uk or on **01392 202092** if you wish to make a request.

How to complain

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113

Appendix Two

Record of Data Protection Activities and Legitimate Interests

Date	Activity	Decision	Basis for Decision	Made by
14.7.17	Recording next of kin/emergency contacts for clients, staff, and volunteers.	It is not necessary to ask next of kin/emergency contact person permission to store their contact details	Considered to be a legitimate interest because their contact details (often just phone number) will only be used in the event of an emergency relating to their cared for person. This person will not be contacted in any other respect, including sending marketing materials.	Sue Martyr with Jacqui Cornish. Discussed with Martyn Rogers
14.7.17	Contact details for staff are collected and stored.	It is not necessary to ask employees permission to store their details.	It is a legitimate interest in that it is not possible to employ them, including run payroll, without their details and therefore is a part of their conditions of employment.	Sue Martyr with Jacqui Cornish. Discussed with Martyn Rogers
14.7.17 Reviewed 1.8.17	Sending staff copies of In the Loop (weekly staff newsletter)	Consent to direct mail/ market staff is not required	The legitimate interest is that it is necessary to keep them abreast of new services, fundraising events, activities and appeals for them to be able to do their job. Each edition of 'In the Loop' states why it is sent to them and that they have the right to request it not to be sent and how to unsubscribe. Following review on 1.8.17 it was agreed that In the Loop is the designated way of informing staff of developments and activities within the organisation and	Sue Martyr with Jacqui Cornish. Discussed with Martyn Rogers

			therefore it is imperative that they receive it to be able to do their job. Therefore, the sentence about their right to request not to receive it has been deleted.	
14.7.17	Collecting personal details on volunteers	It is not necessary to ask volunteers permission to store their details.	The legitimate interest is that storing their details is necessary to manage their volunteering with us. Without us knowing their contact details we would not be able to get in touch with them regarding their role.	Sue Martyr with Jacqui Cornish Discussed with Martyn Rogers
14.7.17 Reviewed 1.8.17	Sending copies of 'Volunteers Voice' to volunteers	Consent to send Volunteers Voice to volunteers is not required. Vols Voice will contain information about fundraising events and a statement that the annual appeal has been launched but no specific ask in this respect. Specific consent will be requested, via a Getting to Know You Form, in order to send a specific ask for donations.	The legitimate interest is that it is necessary to keep them abreast of new services, fundraising events, activities and appeals for them to be able to do their role. Each edition of Vols Voice states why it is sent to them and that they have the right to request it not to be sent and how to unsubscribe. Reviewed 1.8.17. We agreed that whilst it is important for volunteers to be kept up to date with developments and activities within the organisation it is not as vital for them to receive it as it is for staff. Therefore, we agreed to leave in the sentence that they have the right to request not to receive it.	Sue Martyr with Jacqui Cornish. Discussed with Martyn Rogers
14.7.17	Gather personal and special category of	Consent to store and share is sought in all instances.	Consent to send them information about services and activities	Sue Martyr with Jacqui Cornish

	personal data on clients		will be recorded in Charitylog. Consent to send information on fundraising activities will be stored in ETapestry. Information will not be sent if consent is not given.	Discussed with Martyn Rogers
14.7.17	Gather personal and special category of personal data on I&A clients	Consent to store and share is sought in all instances.	Consent to share is specified, eg DWP, HMRC etc and a copy of that signed consent is sent to the relevant body when acting on behalf of the client. Consent to send info on services and activities will be recorded in Charitylog. Consent to send fundraising activities info will be recorded in ETapestry.	Sue Martyr with Jacqui Cornish Discussed with Martyn Rogers
14.7.17	Sending I&A clients a feedback questionnaire and including a letter asking for donation.	Consent to send feedback not required. Consent to send donation request is required.	Sending a feedback form is all part of them receiving the service and so separate consent is not required. The donation request is on a separate sheet and does not form part of the main feedback letter. This form will not be included if consent is not given. <i>Note: New consent forms are being used for new clients but there will be an overlap of current clients receiving service. It is acceptable to send them a donation request until the new GDPR regs come in in May 2018 after which date the form will not be sent if consent not given.</i>	Sue Martyr with Jacqui Cornish Discussed with Martyn Rogers

14.7.17	Taking consents from I&A clients over the telephone	<p>In most cases clients are seen in person, either at home or in the office, in which case written consent is sought.</p> <p>There are occasions when everything is dealt with over the telephone in which case verbal consent will be taken over the phone and recorded.</p>	<p>A script to use (suggested by Tim Bridger at AUK in London) has been agreed as:</p> <p>"We may wish to contact you with updates about our organisation, let you know what we are up to, and to give you a chance to donate to us. Is this, ok? Yes / No"</p> <p>If they say yes – they would be added to Etap and clog and we will send them a letter ...</p> <p>"Dear Joe Blogs</p> <p>Further to your telephone conversation with Sam last week I am writing to confirm that you gave permission for us to send you information about our services and information about our fundraising events and appeals. In order to do this, we need to store your personal information on our secure database. Age UK Exeter promises never to share or sell your information to other organisations or businesses and you can opt out of our communications at any time by phoning 01392 202092, writing to Age UK Exeter, 138 Cowick Street, Exeter EX4 1HS or by sending an email to @admin@ageukexeter.org.uk. Your information will be kept for 6 years after you finish volunteering unless you ask us to remove it from our records. After this time, the information we keep about you will be minimised and archived.</p> <p>If you would like to read our full Privacy Statement please visit www.ageukexeter.org.uk or request a copy by contacting us as above.</p>	<p>Jacqui Cornish and Sue Martyr.</p> <p>Discuss with Martyn Rogers</p>	
14.7.17	Collecting details and consents from someone who has made a donation		<p>When someone has made a donation to us we will:</p> <ul style="list-style-type: none"> • Receive a donation • Write or call them to thank them 	Jacqui Cornish	

			<ul style="list-style-type: none"> • Send GTKY form with letter of thanks • Wait • After one month anonymise their data OR add to mail preferences. 	Discussed with Martyn Rogers	
2.8.17	Appointing a Data Protection Officer	Martyn Rogers & Sue Martyr discussed whether we needed to appoint a DPO and came to the conclusion that we did not.	<p>The basis of this decision was that we hold details on about 1500 active people at any one time which we did not consider to be large scale.</p> <p>Sue Martyr is responsible for the day to day work ensuring that we are compliant with the final decisions and responsibility sitting with Martyn Rogers</p>		

1.11.17	Removing people's records when no longer receiving service	<p>Martyn Rogers & Sue Martyr discussed on several occasions whether we can legitimately keep people's records on Charitylog once they no longer receive service.</p> <p>Donors and supporters with entries on Etapestry – we agreed that if they are no longer actively supporting us we will retain their name and postcode plus details of their donations (for accounting purposes) but their other personal details will be removed.</p>	<p>We agreed that we can keep records on file.</p> <p>The basis for this decision is that we need to know in the future the extent that someone was involved with us if we need to prove our involvement in the event of a legacy being left.</p> <p>The right to be forgotten remains. If someone expresses their wish for this to happen their records will be anonymised which means that we will not have any evidence that we were involved.</p> <p>Donors and supporters on Etap – this agreement was made on the basis that their involvement with us is more limited and therefore fuller information is not required.</p> <p>The right to be forgotten remains. If someone expresses their wish for this to happen their record will be anonymised (although their donation history will be retained for accounting purposes) and we will not know that we had a connection with them.</p>	<p>Sue Martyr and Martyn Rogers</p> <p>Discussed with Jacqui Cornish</p>	
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14.4.2022	Asking for and recording preliminary consent when someone first contacts us. Fuller consent obtained when further contact is made with the client.	Agreed to no longer ask for this preliminary consent and instead to base it on legitimate interest.	SS and NF discussed and agreed that instead of asking for consent we should move to legitimate interest on the basis that we are unable to process their enquiry without entering them onto the system. The Privacy Notice does not need amending.	Nicky Flynn and Sue Stride agreed this.	
18.11.22	Work on an over-all retention schedule for Age UK Exeter, taking into consideration other Local Age UK's retention protocols and those of other charities.	Data Retention Schedule complete and agreed by Board of Trustees 13.12.22	Data cleansing work therefore commenced according to schedule and should be completed in early 2023	Nicky Flynn and Marie Wells	