

Data Protection Policy

Context and overview

Key details

Author:	Kellie Rickell Systems and Compliance Lead
Approved on:	27th June 2023
Next review date:	27th June 2024

This Data Protection Policy sets out how Age UK Lambeth collects, uses, and protects any personal data that you provide to us when you use our website or interact with us in any other way. Any information Age UK Lambeth holds, regardless of its format, and how it was acquired, must be protected against unauthorised access/use, disclosure, modification, recording or destruction.

We are committed to ensuring that your privacy is protected and we will only process your personal data in accordance with the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The policy has been approved by the Finance and Risk subcommittee.

A culture of information security is encouraged and promoted within the organisation, placing information security as a critical feature of what we do and ensuring that everyone understands their individual and collective responsibilities in this area. Key individuals are identified as having specific responsibilities within the organisation;

Area of Responsibility	Responsible
The board is responsible for governance. They approve and monitor the Information Governance Policy and through the Chief Executive monitor the organisation's adherence with this	The Board of Trustees
Information security (implementing the procedures) and Data protection	Head of Finance and Resources

Procedural audit - effectiveness and compliance	Quality and Impact Lead
Service level compliance	Service Leads
Employee and volunteer data and information	HR Lead Volunteer Coordinator
Non HR data and information	Service Leads

1. Definitions

To ensure clarity and common understanding, the following definitions are provided:

Personal Data: Information about an identified or identifiable person.

Data Processing: Any operation performed on personal data.

Data Controller: Entity responsible for personal data processing.

Data Processor: Entity processing personal data on behalf of the data controller.

Data Subject: Individual whose personal data is being processed.

Consent: Voluntary agreement to process personal data.

Legitimate Interests: Legal basis for processing personal data.

Privacy by Design: Integrating privacy into project development.

Data Protection Officer (DPO): Individual overseeing data protection activities.

UK GDPR: The United Kingdom's adoption of the General Data Protection Regulation (GDPR) governing data protection and privacy rights.

Privacy Impact Assessment (PIA): Assessment of project impact on privacy.

Data Protection Impact Assessment (DPIA): Assessment of high-risk data processing activities.

Data Breach: Unauthorised access or loss of personal data.

Special Category Data: Sensitive personal data, including racial origin, political opinions, religious beliefs, health data, and more. Requires additional protection.

These definitions assist in establishing a shared understanding of key terms and concepts used throughout the policy.

2. Policy Content

This policy explains:

- What personal data we collect and why we collect it
- How we use your personal data
- Your rights in relation to your personal data
- How we protect your personal data
- How long we keep your personal data
- Training and monitoring data protection policy and practice

- How to contact us

The Policy incorporates other legislative obligations required by the Privacy and Electronic Communications Regulation (PECR). PECR regulates electronic communications (marketing calls, SMS, emails and faxes, as well as cookies and location data). It differs from the UK GDPR as it regulates the processing of all data for the above channels, not just personal data. For example, we must have consent to send electronic direct marketing under PECR, meaning the lawful basis under UK GDPR of “legitimate interests” cannot be applied to these channels.

3. What personal data do we collect and why do we collect it?

3.1 We collect the minimum amount of data necessary for the purpose. Personal data might be collected when you:

- Make a donation to us
- Sign up to receive our newsletters or other communications
- Participate in one of our events or campaigns
- Contact us with a question or request
- Are referred to one of our services or have referred yourself

3.2 The personal data we collect may include your name, email address, postal address, phone number, and payment details. We collect this data in order to:

- Process your donation or other transactions
- Keep you informed about our work and how you can support us
- Invite you to events and campaigns
- Respond to your queries and requests
- Register to become a volunteer

3.3 We may ask to collect optional sensitive special category data including:

- Ethnicity
- Religion
- Medical history (including, vaccination status, and/or GP information)
- Date of birth
- Gender
- Financial disclosure (e.g. welfare information).
- Photo proof of identity (e.g. passport, driving licence.)

We may be in touch to request feedback from you about the service and support you received. You can choose to remain anonymous.

4. How do we use your personal data?

We use your personal data for the purposes for which it was collected, including to:

- Process your donation or other transactions
- Keep you informed about our work and how you can support us
- Invite you to events and campaigns
- Respond to your queries and requests
- Communicate with you about your voluntary role
- Share your information with third party organisations (with your informed consent)

For more information on how your information is used, [visit our website](#).

We may also use your personal data for statistical analysis and to help us improve our website and the services we offer.

We will not share your personal data with any third parties for marketing purposes without your consent.

5. Your rights in relation to your personal data

You have the right to:

- Request a copy of the personal data we hold about you
- Request that we correct any personal data that is incorrect or out of date
- Request that we delete your personal data
- Object to the processing of your personal data
- Request that we restrict the processing of your personal data
- Request that we transfer your personal data to another organisation

You can exercise these rights by contacting us using the details provided in the [privacy policy](#) on our website.

6. Principles for Data Processing

Age UK Lambeth adheres to the six principles for data processing outlined in the UK GDPR:

6.1 Lawfulness, Fairness, and Transparency

Personal and special category data is processed lawfully, fairly, and transparently. Age UK Lambeth ensures that a valid legal basis exists for processing personal data, and individuals are provided with clear and concise information about the processing in a transparent manner.

.

6.2 Purpose Limitation

Personal data and special category data is collected and processed for specified, explicit, and legitimate purposes. Age UK Lambeth defines the purposes for which

personal data is collected and ensures that any further processing is compatible with those purposes.

6.3 Data Minimization

Personal data is limited to what is necessary for the intended purposes. Age UK Lambeth collects and processes only the minimum amount of personal data required to achieve the specified purposes.

6.4 Accuracy

Personal data is accurate, kept up to date, and steps are taken to ensure its accuracy. Age UK Lambeth maintains procedures to ensure that personal data is accurate and updated or rectified if necessary.

6.5 Storage Limitation

Personal data is retained for no longer than necessary for the purposes for which it is processed. Age UK Lambeth establishes data retention policies that specify the periods for which personal data is kept, considering legal requirements and the purposes for data collection. If you would like more details about our data retention policy, please contact us at data@ageuklambeth.org.

6.6 Integrity and Confidentiality

Personal data is processed in a manner that ensures its security, integrity, and confidentiality. Age UK Lambeth implements appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.

7. Process for Identifying and Minimising Data Protection Risks

Age UK Lambeth has established a systematic process to identify and minimise data protection risks before commencing new projects or processes involving personal data. The process includes the following steps:

7.1 Project Initiation and Planning

The project team identifies the objectives, scope, and potential data protection implications of the project.

7.2 Privacy and Data Protection Assessment

A comprehensive privacy and data protection assessment is conducted, examining data flows, collection methods, storage, and sharing practices. The legal basis for processing personal data is evaluated, and potential risks to individuals' privacy and data protection rights are assessed.

7.3 Privacy Impact Assessment (PIA)

For projects with significant privacy risks, a Privacy Impact Assessment (PIA) is conducted. This evaluation identifies potential risks, assesses their likelihood and severity, and proposes measures to minimise or mitigate those risks.

7.4 Risk Mitigation Strategies

Based on assessment findings, Age UK Lambeth develops and implements risk mitigation strategies. Measures include implementing technical and organisational controls, updating policies and procedures, and seeking individuals' consent where necessary.

7.5 Consultation and Decision-Making

Throughout the process, relevant stakeholders, including the DPO and Information Governance Lead, project team members, and individuals whose data is being processed, are consulted to ensure a comprehensive assessment of risks and informed decision-making.

7.6 Documentation and Compliance

The assessment, findings, and risk mitigation measures are documented, providing evidence of compliance with data protection requirements. The documentation is reviewed periodically to reflect changes in projects, processes, and data protection laws.

7.7 Data Protection Impact Assessment (DPIA)

For projects or plans involving the processing of personal data with high risks to individuals' privacy and data protection, Age UK Lambeth conducts a Data Protection Impact Assessment (DPIA). This assessment follows the steps outlined in the GDPR and includes:

- Data Processing Description
- Assessment of Necessity and Proportionality
- Identification of Risks and Impact
- Evaluation of Privacy Safeguards and Measures
- Risk Mitigation and Recommendations
- Consultation and Decision-Making
- Review and Update

The DPIA ensures a thorough evaluation of risks and proposes measures to minimise those risks, promoting responsible and compliant data handling practices.

8. Data Breach Management

Age UK Lambeth maintains procedures for detecting, reporting, and managing data breaches. In the event of a data breach, the organisation follows a predefined incident response plan to mitigate the impact, notify relevant parties, and take necessary actions to prevent similar incidents in the future.

9. Training and Awareness

Age UK Lambeth provides regular training and awareness programs to staff members and stakeholders, ensuring they understand their responsibilities regarding data protection and privacy. Training covers relevant policies, procedures, and best practices, fostering a culture of data protection compliance.

10. Monitoring and Review

The implementation and effectiveness of this policy will be monitored by the Chief Executive and the DPO (Data Protection Officer) annually. The Chief Executive and the Board of Trustees will also review the policy annually and recommend and implement action to ensure the policy is up to date and compliant with current legislation and guidance.

How to contact us

If you have any questions about this Data Protection Policy or if you would like to exercise your rights in relation to your personal data, please contact us by email at data@ageukalmbeth.org or by calling our Gateway Helpline on 0333 360 3700.

Data Protection Officer (DPO): Simon Lincoln

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK data protection authority. You can find out more about your rights and how to make a complaint to the ICO on the ICO website (<https://ico.org.uk/>).