

# Data Protection Policy

Issue 2. February 2025



## **The Margaret Adcock Foundation**

Registered Charity Number 1205889  
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The Margaret Adcock Foundation is a Charitable Incorporated Organisation governed by a Constitution which established the objects and powers of the charity. The Foundation entered the Register of Charities on 24th November 2023 with Registered Charity Number 1205889.

# Data Protection Policy

## 1. Purpose

The Margaret Adcock Foundation is committed to protecting the personal data of its beneficiaries, donors, employees, volunteers, and other stakeholders. This policy outlines how we collect, use, store, and safeguard personal data to ensure compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

## 2. Scope

This policy applies to all Trustees, employees, volunteers, contractors, and anyone else processing personal data on behalf of The Margaret Adcock Foundation. It covers all personal data held electronically, on paper, or otherwise.

## 3. Key Definitions

- **Personal Data:** Any information relating to an identifiable individual (e.g., name, email, address, phone number).
- **Special Category Data:** Sensitive data, such as racial/ethnic origin, political opinions, religious beliefs, health information, or sexual orientation.
- **Processing:** Any operation performed on personal data, including collection, storage, use, sharing, or deletion.
- **Data Controller:** The organisation responsible for determining how personal data is processed (e.g., The Margaret Adcock Foundation).
- **Data Processor:** An individual or organisation processing data on behalf of the Data Controller.

## 4. Principles of Data Protection

The Margaret Adcock Foundation adheres to the following principles when processing personal data:

1. **Lawfulness, Fairness, and Transparency:** Data must be processed lawfully, fairly, and transparently.
2. **Purpose Limitation:** Data must only be collected for specific, explicit, and legitimate purposes.
3. **Data Minimisation:** Only collect data that is adequate, relevant, and necessary.
4. **Accuracy:** Ensure data is accurate and kept up to date.
5. **Storage Limitation:** Retain data only for as long as necessary.
6. **Integrity and Confidentiality:** Process data securely to protect against unauthorised access or loss.

## 5. Legal Bases for Processing

The Margaret Adcock Foundation processes personal data based on one or more of the following legal bases:

- Consent: Explicit consent has been provided by the individual.
- Contract: Processing is necessary to fulfil a contract.
- Legal Obligation: Compliance with a legal requirement.
- Legitimate Interests: Processing is necessary for the legitimate interests of the charity, provided it does not override individual rights.
- Vital Interests: To protect someone's life in an emergency.

## 6. Rights of Individuals

Under the UK GDPR, individuals have the following rights regarding their personal data:

1. Right to be Informed: About how their data is used.
2. Right of Access: To request a copy of their data.
3. Right to Rectification: To have inaccurate data corrected.
4. Right to Erasure: To request deletion of their data in certain circumstances.
5. Right to Restrict Processing: To limit how data is used.
6. Right to Data Portability: To receive data in a portable format.
7. Right to Object: To object to data processing in certain situations.
8. Rights in Relation to Automated Decision-Making: To challenge decisions made solely by automated means.

## 7. Data Collection and Use

### 7.1 What Data We Collect

We may collect the following types of personal data:

- Beneficiaries: Name, contact details, demographic information, and service history.
- Donors: Name, contact details, donation history, and payment details.
- Employees and Volunteers: Name, contact details, employment/volunteering records, and emergency contact information.

### 7.2 How We Use Data

- To deliver services to beneficiaries.
- To manage relationships with donors and process donations.
- To manage employment and volunteering arrangements.
- To comply with legal and regulatory obligations.

## 8. Data Security

The Margaret Adcock Foundation implements appropriate technical and organisational measures to protect personal data, including:

- Access Controls: Restrict access to personal data to authorised personnel only.
- Encryption: Use encryption for sensitive data and secure file storage.
- IT Security: Maintain up-to-date antivirus software, firewalls, and secure passwords.
- Physical Security: Safeguard paper records in locked cabinets and offices.

## 9. Data Sharing

- Personal data will only be shared with third parties where necessary, such as:
  - Service providers acting as data processors (e.g., IT support or payroll services).
  - Regulatory bodies, where required by law.
- All third parties must sign a Data Processing Agreement to ensure compliance with the UK GDPR.

## 10. Data Retention

We retain personal data only for as long as necessary to fulfil its purpose or comply with legal obligations. Specific retention periods are:

- Beneficiary records: 5 years after service delivery ends.
- Donor records: 7 years for financial records.
- Employee and volunteer records: 6 years after employment ends.
- After the retention period, data will be securely deleted or anonymised.

## 11. Data Breaches

A data breach occurs when personal data is lost, accessed, or disclosed without authorisation. In the event of a breach:

1. The incident must be reported immediately to the Data Protection Officer (DPO) or designated lead.
2. The breach will be assessed, and necessary actions taken to mitigate harm.
3. Serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours.

## 12. Training and Awareness

- All Trustees, staff, and volunteers will receive training on data protection and their responsibilities under this policy.
- Refresher training will be provided annually or when significant changes to the law or charity operations occur.

## 13. Data Protection Officer (DPO)

The Margaret Adcock Foundation has appointed David Adcock as the Data Protection Officer (or equivalent lead) to oversee data protection compliance. The DPO can be contacted at [david@margaretadcock.org](mailto:david@margaretadcock.org).

## 14. Review and Updates

This policy will be reviewed annually by the Board of Trustees or sooner if there are significant changes to the law or the charity's operations.

## Approval and Acknowledgment

This policy has been approved by the Board of Trustees. All Trustees, staff, and volunteers must adhere to its principles and procedures.

### Approved By:

- Chair of Trustees: D. Adcock \_\_\_\_\_
- Date: February 2025 \_\_\_\_\_

### Policy Review Date:

- Next Review: November 2025 \_\_\_\_\_