

Data Protection Policy including Key Procedures

Revision Number: 4
Date: 9th April 2025
Status: Approved

HEADING	SECTION CONTENT
<p>Aims of this Policy</p>	<p>Milton's Cottage Trust (CIO) needs to keep on file certain information on its trustees, employees, volunteers and service users to carry out its day-to-day operations, meet its objectives and comply with legal obligations.</p> <p>The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 2018. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.</p> <p>This policy covers trustees, staff, volunteers, visitors and supporters.</p>
<p>Definitions</p>	<p>In line with the Data Protection Act 2018 principles, Milton's Cottage Trust CIO will ensure that personal data will:</p> <ul style="list-style-type: none"> • Be obtained fairly and lawfully and shall not be processed unless certain conditions are met • Be obtained for a specific and lawful purpose • Be adequate, relevant but not excessive • Be accurate and kept up to date • Not be held longer than necessary • Be processed in accordance with the rights of data subjects • Be subject to appropriate security measures • Not to be transferred outside the European Economic Area (EEA) <p>The definition of 'processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper-based personal data as well as that kept on computer.</p> <p>The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all personal data it processes, as follows.</p> <p>Accountability: those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.</p> <p>Visibility: Data subjects should have access to any information about themselves an organisation holds. This includes the right to have incorrect personal data corrected and know who has had access to this data.</p> <p>Consent: The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose other than required by law, the data subject's consent should be explicitly obtained.</p>

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	<p>Access: Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.</p> <p>Stewardship: Those collecting personal data have a duty of care to protect this data throughout the data life span.</p>
Type of information processed	<p>Milton's Cottage Trust (CIO) currently processes personal information for:</p> <ul style="list-style-type: none"> • Donors and potential donors • Gift Aid • Sub-contractors and suppliers • Trustees, employees and volunteers • Visitors <p>Personal information is kept in the following forms:</p> <ul style="list-style-type: none"> • Digital copies • Paper copies • Online copies via The Cloud <p>Groups of people within the organisation who currently process personal information are: trustees, employees and volunteers.</p>
Responsibilities	<p>Under the Data Protection Guardianship Code, the governing body of a not-for-profit organisation has overall responsibility for personal data. In the case of Milton's Cottage Trust (CIO), this is the trustees. As such, they are responsible for:</p> <ul style="list-style-type: none"> • Understanding and communicating obligations under the Act • Identifying potential problem areas or risks • Producing clear and effective procedures • Notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes <p>All trustees, employees and volunteers who process personal information must ensure they not only understand but also act in line with this policy and associated data protection principles.</p> <p>Breach of this policy will result in an investigation by the trustees and re-training for any trustees, staff members and volunteers involved.</p>
Policy Implementation	<p>To meet our responsibilities trustees, employees and volunteers will:</p> <ul style="list-style-type: none"> • Ensure any personal data is collected in a fair and lawful way • Explain why it is needed at the start • Ensure that only the minimum amount of information needed is collected and used • Ensure the information used is up to date and accurate • Review the length of time information is held • Ensure it is kept safely

	<ul style="list-style-type: none"> • Ensure the rights people have in relation to their personal data can be exercised <p>We will ensure that:</p> <ul style="list-style-type: none"> • Everyone managing and handling personal information is trained to do so • Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do • Any disclosure of personal data will be in line with our procedures • Queries about handling personal information are dealt with swiftly and politely
Training	<p>Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:</p> <ul style="list-style-type: none"> • On induction: when starting to be involved with handling personal data • General training / awareness raising: as part of the annual induction
Gathering and checking information	<p>Before personal information is collected, we will consider: whether it is necessary for safety, security, Gift Aid or other operating requirements to fulfil the duties of the trustees. We will take the following measures to ensure that personal information kept is accurate.</p> <ul style="list-style-type: none"> • Personal sensitive information will not be used apart from the exact purpose for which permission was given
Sharing information	<p>In order to meet contractual and / or legal requirements we may share information with the following organisations:</p> <ul style="list-style-type: none"> • Funders • Partner organisations • Third-party consultants • The police • For safeguarding purposes
Storing information	<ul style="list-style-type: none"> • An Information Asset Register is available as a separate Excel spreadsheet.
Data Security	<p>The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:</p> <ul style="list-style-type: none"> • Data will be stored on a secure disc system in encrypted folders <p>Any unauthorised disclosure of personal data to a third party by a trustee, employee or volunteer may result in disciplinary proceedings.</p>
Subject Access Requests	<p>Anyone whose personal information we process has the right to know:</p> <ul style="list-style-type: none"> • What information we hold and process on them • How to gain access to this information • How to keep it up to date • What we are doing to comply with the Act

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	<p>They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.</p> <p>Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Data Protection Trustee at the Trust's postal address, as follows:</p> <p>Milton's Cottage, 21 Deanway, Chalfont St Giles, HP8 4JH The following information will be required before access is granted:</p> <ul style="list-style-type: none"> • Name and contact details • The reason for requiring access <p>We may also require proof of identity before access is granted. The following forms of ID will be required: the usual ID papers required by any banking organisation</p> <p>Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 30 days required by the Act from receiving the written request.</p>
<p>Response procedures</p>	<p>Data requests: this is covered in the Subject Access Requests section above.</p> <p>Data breaches: a Data Breach Response Plan has been developed to accompany this policy.</p> <p>Data attacks: in the event of a data attack, Milton's Cottage will bring in external IT expertise to help us respond as quickly and effectively as possible. Our Data Breach Response Plan will also be followed as part of our response procedure.</p>
<p>Children, young people & vulnerable adults</p>	<p>When working with these groups, the only data that will be collected by trustees, employees and volunteer is postcode data, to support funding reports and applications. Photographs of funded events may also be kept on file, for grant reporting purposes, if the appropriate signed consent is provided by parents / guardians to do so. Feedback from young people about workshops and events will be collected anonymously. This is in line with current Audience Agency's guidance, which advises to only collect information that is needed and ensure unnecessary information about vulnerable groups is not kept on file.</p>
<p>Review</p>	<p>This policy will be reviewed regularly (at least once a year) to ensure it remains up to date and compliant with the law. It was last reviewed on 9th April 2025 and is due to be reviewed again by April 2026.</p>