



Word Fountain Christian Ministries (WFCM)  
Family Arena Community Organisation  
**Data Protection Policy**



### **Policy statement**

WFCM/Family Arena is committed to a policy of protecting the rights and privacy of individuals, voluntary and community group members, volunteers' staff and others in accordance with The Data Protection Act 1998. The policy applies to all volunteers, facilitators, learners and staff at the Centre. Any breach of The Data Protection Act 1998 or Data Protection Policy is considered to be an offence and in that event, disciplinary procedures apply.

As a matter of good practice, other organisations and individuals working with the Centre, 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 sign a contract agreeing to abide by this policy.

### **Legal Requirements**

Data are protected by the Data Protection Act 1998, which came into effect on 1 March 2000. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is processed without their consent.

The Act requires us to register the fact that we hold personal data and to acknowledge the right of 'subject access' – volunteers, facilitators, learners and staff have the right to copies of their own data.

### **Managing Data Protection**

We will pursue voluntary registration with the Information Commissioner.

### **Purpose of data held by the Community Association**

Data may be held by us for the following purposes:

1. Staff Administration
2. Fundraising
3. Realising the Objectives of a Charitable Organisation or Voluntary Body
4. Accounts & Records
5. Advertising, Marketing & Public Relations
6. Information and Databank Administration
7. Journalism and Media
8. Processing For Not For Profit Organisations
9. Research
10. Volunteers



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### **Data Protection Principles**

In terms of the Data Protection Act 1998, anyone who obtains personal information or 'data' about other individuals is a 'data controller' and is regulated by the Data Protection Act 1998. As such, we determine the purpose for which, and the manner in which, any personal data are, or are to be, processed.

WFCM/Family Arena is a data controller in relation to the information collected about our learners as well as the information obtained about employees as part of the process of providing them with employment. For the purposes of this policy this includes past, current or potential learners or employees.

WFCM/Family Arena is also a 'data processor' in relation to our grant funding body or bodies.

### **What is Personal Data/Sensitive Data?**

'**Personal**' data means data consisting of information (or a combination of information) from whatever source, which either directly or indirectly identifies a living individual whether held in a paper-based file, in an electronic form or by any other automated or non-automated means.

'**Sensitive**' data includes data relating to physical or mental health, sexual life, ethnic origin, race, political beliefs, religious views, trade union membership, commission or the alleged commission of an offence, or proceedings relating to such an offence.

WFCM/Family Arena will only process sensitive information on the above for specific, legitimate purposes as detailed within the provisions of the Data Protection Act e.g. for Equal Opportunities monitoring.

Most volunteers and staff working with or for WFCM/Family Arena will process standard 'personal' data on a daily basis, such as general personal details e.g. names and addresses. 'Sensitive' data should not be collected or processed without the express permission of WFCM/Family Arena Coordinators and where appropriate, the individual's consent.

To process data in accordance with the 8 data protection principles below Personal data must be:

#### **1. Fairly and lawfully processed**

All paperwork will state their intentions on processing the data and state if, and to whom, we intend to give the personal data. Also provide an indication of the duration the data will be kept.



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**2. Processed for limited purpose**

We will not use data for a purpose other than those agreed by data subjects (volunteers, facilitators, learners and staff and others). If the data held by us are requested by external organisations for any reason, this will only be passed if data subjects (volunteers, facilitators, learners and staff and others) 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 The Data Protection Act 1998 and WFCM/Family Arena Data Protection Policy.

**3. Adequate, relevant and not excessive**

WFCM/Family Arena 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.

**4. Accurate and up-to-date**

We will provide our members (volunteers, facilitators, learners and staff and others) with a copy of their data once a year for information and updating where relevant. All amendments will be made immediately and data no longer required will be deleted or destroyed. It is the responsibility of individuals and organisations to ensure the data held by us are accurate and up-to-date. Completion of an appropriate form (provided by us) will be taken as an indication that the data contained are accurate. Individuals should notify us of any changes, to enable personnel records to be updated accordingly. It is the responsibility of the Association to act upon notification of changes to data, amending them where relevant.

**5. 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 membership has elapsed.

**6. Processed in accordance with the individual's rights**

All individuals that the WFCM/Family Arena hold data on have the right to:

- Be informed upon the request of all the information held about them within 40 days.
- Prevent the processing of their data for the purpose of direct marketing.
- Compensation if they can show that they have been caused damage by any contravention of the Act.
- The removal and correction of any inaccurate data about them.

**7. Secure**

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

All computers have a log in system and our Contact Database is password



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protected, which allow only authorised staff to access personal data. Passwords on all computers are changed frequently. All personal and financial data is kept in a locked filing cabinet and can only be accessed by authorised officers. When volunteers and staff members are using the laptop computers out of the office care should always be taken to ensure that personal data on screen is not visible to strangers.

**8. Not transferred to countries outside the European Economic Area, unless the country has adequate protection for the individual.**

Data must not be transferred to countries outside the European Economic Area without the explicit consent of the individual. The Association 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 web site that can be accessed from outside the European Economic Area.

**To ensure we demonstrate best practice, volunteers and staff should abide by the following:**

- Access to any personal information should be kept on a need to know basis
- Information should be stored securely at all times and data stored electronically should be
  - protected from unauthorised access, accidental deletion or malicious hacking attempts
  - Appropriate action should be taken before transferring or transmitting information to third parties,
  - this may include encrypting or password protecting documents
- Removable media (discs, memory sticks, etc.) must contain the appropriate security and use the recommended encryption standard
- If working from home, confidential information should be kept private
- Information should not be retained on the hard drive of employees' work or personal PC or laptop
- Information should be disposed of securely
- Any security breaches must be reported to employees' manager
- Personal data must be kept securely, for example:
  - In a locked room, locked filing cabinet or locked drawer
  - If computerised, it should be password protected with passwords regularly changed
- All data stored on disks or memory sticks should be removed before disposal
- Any papers containing personal information should be shredded before disposal
- Staff computers should be locked if left unattended

**Archiving of data**

Family Arena is required to retain documentation to prove that learning has taken place; this is a requirement of our funders. This includes, but is not limited to enrolment forms, attendance registers and course files and as such must be retained as follows:



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- a) **Non-accredited provision** - Documentation must be kept for 6 years after the end of the financial year in which the academic year concluded.
- b) **Accredited provision** – As stipulated for archiving.

This policy will be regularly reviewed in line with the Data Protection Act 1998 and other relevant legislation and recognised best practice principles.

Signed:     *M Adefala*    

Dated: 25th May 2020