

**Data Protection Policy**

**Introduction:**

Watford foodbankneeds to collect and use information about the Data Subjects who we come into contact with in order to carry out our work. This information must be collected and dealt with appropriately – whether on paper, electronically, or recorded on other material - and there are safeguards to ensure this under the Data Protection Act 2018.

**Data Controller:**

Watford foodbankis the Data Controller under the Act, and will determine what purposes the information held will be used for. Watford foodbank is also responsible for notifying the Information Commissioner of the data we hold or are likely to hold, and the general purposes that this data will be used for.

**Disclosure:**

Watford foodbankwill not disclose your personal information to a third party unless we believe it is lawful to do so. We will not pass on your details to anyone outside the foodbank for marketing purposes. There are circumstances where the law allows Watford foodbank to disclose data without the data subject’s consent; these are:

1. Carrying out a legal duty as authorised by an appropriate legal officer

2. The Data Subject has already made the information public

3. Conducting any legal proceedings, obtaining legal advice or defending any legal rights

Watford foodbankplaces great importance on the correct treatment of personal information as a key element in the success of our working relationships, and in maintaining the confidence of those with whom we deal. We intend to ensure that personal information is treated lawfully and correctly.

**Data Protection Act Adherence:**

To this end Watford foodbank will, through appropriate management and strict application of criteria and controls, adhere to the Principles of the Data Protection Act 2018, which require that:

1. personal data should be processed fairly and lawfully
2. data should be obtained only for one or more specified and lawful purposes
3. the data should be adequate, relevant and not excessive
4. data should be accurate and, where necessary, kept up-to-date
5. any data should not be kept for longer than necessary
6. personal data should be processed in accordance with individual’s rights under the act
7. data should be kept secure
8. personal data should not be transferred outside the European Economic Areas unless the country offers adequate data protection

**Data collection:**

When collecting data, Watford foodbank will ensure that the Data Subject:

* understands why the information is needed
* understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing
* as far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
* is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
* has received sufficient information on why their data is needed and how it will be used

Watford foodbank will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

**Data Storage:**

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

It is the foodbank’s responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation which has been passed on/sold to a third party.

**Data access and accuracy:**

All Data Subjects have the right to access the information Watford foodbank holds about them. If the details we hold are incorrect you can ask us to amend them.

Watford foodbank will also take reasonable steps to ensure that this information is kept up-to-date by asking data subjects whether there have been any changes.

**In addition, Watford foodbank will ensure that:**

1. It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
2. Everyone processing personal information understands that they are contractually responsible for following good data protection practice
3. Everyone processing personal information is appropriately trained to do so
4. Everyone processing personal information is appropriately supervised
5. Anybody wanting to make enquiries about handling personal information knows what to do
6. It deals promptly and courteously with any enquiries about handling personal information
7. It describes clearly how it handles personal information
8. It will regularly review and audit the way it holds, manages and uses personal information
9. It regularly assesses and evaluates its methods and performance in relation to handling personal information
10. All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

*This policy will be reviewed and updated as necessary to reflect best practice in data management, security and control, and to ensure compliance with any changes or amendments made to the Data Protection Act 2018. In case of any queries or questions in relation to this policy please contact us at: info@watford.foodbank.org.uk.*

***The following list of definitions of the technical terms used is intended to aid understanding of this policy.***

**Data Controller** – The person who (either alone or with others) decides what personal information The Trussell Trust will hold and how it will be held or used. – (Trustees)

**Data Protection Act 2018** – The UK legislation that provides a framework for responsible behaviour by those using personal information.

**Data Protection Officer** – The person responsible for ensuring that it follows its data protection policy and complies with the Data Protection Act 2018.

**Data Subject/Service User** – The individual whose personal information is being held or processed by Watford foodbank (for example: a client, an employee).

**‘Explicit’ consent** – is a freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

**Notification** – Notifying the Information Commissioner about the data processing activities of The Trussell Trust as certain activities may be exempt from notification.

**Information Commissioner** – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 2018.

**Processing –** Collecting, amending, handling, storing or disclosing personal information.

**Personal Information** – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about companies and agencies but applies to named persons or employees within Watford foodbank.

**Sensitive data** – means data about:

* Racial or ethnic origin
* Political opinions
* Religious or similar beliefs
* Trade union membership
* Physical or mental health
* Sexual life
* Criminal record
* Criminal proceedings relating to a data subject’s offences

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