

# CHERNOBYL CHILDREN'S PROJECT (UK)

# ПОДДЕРЖКА ДЕТЯМ БЕЛАРУСИ

## Data Protection and Privacy Policy

### 1. Data protection - general principles

Chernobyl Children's Project (UK) is committed to processing data in accordance with its responsibilities under the GDPR, in particular Article 5 of the GDPR which requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals.
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 2. General provisions

- a. This policy applies to all personal data processed by the charity.
- b. CCP (UK) has appointed Trustee **Brian Hardwick** to take responsibility for the charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

### 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, CCP (UK) will regularly audit the systems that it uses for the collection and storage of data to ensure that it is operating in compliance with the GDPR.
- b. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.
- c. Individuals may request to have this information deleted at any time and we undertake to comply within 48 hours.

### 4. Lawful purposes

All data collected and processed by CCP (UK) will be done so on the basis of consent or legitimate interests.

#### 4.1 Data stored for the purposes of informing interested individuals about the charity's activities

- a. CCP (UK) only stores email and postal addresses of those who have given it permission to do so by active opt-in (ie: by checking an unchecked box on donation forms or by actively signing up for

receipt of newsletters and other information). CCP (UK) uses these addresses to send out newsletters and inform opted-in individuals about the activities of the charity.

- b. None of this information will ever be shared with or sold to other organisations.
- c. Evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available and records of this revocation will be maintained in CCP (UK)'s documentation.

#### **4.2 Data stored for the purposes of vetting staff, host families and volunteers**

- a. Staff, host families and volunteers who come into contact with children are required to obtain DBS checks. An official from the local group will gather information from the individuals concerned that is then passed to the Chief Executive or a Trustee of the charity. The application is made online through an umbrella company.
- b. The local group official will not retain or store any of the data passed on to the Trustee or Chief Executive of the Charity.
- c. The Trustee or Chief Executive of the charity is responsible for inputting the data to the umbrella organisation that process the DBS check application. This data will be kept on a secure computer that has up-to-date firewall and anti-virus software installed.
- d. No information about the applicant that results from the DBS check is passed directly to the charity.

#### **4.3 Donors agreeing to Gift Aid on their Donations**

- a. Many donors allow CCP (UK) to claim Gift Aid on their donations.
- b. HMRC require the charity to retain the names and addresses of the donors for seven years. This information will be kept on a separate database held securely by the Treasurer to the Charity.
- c. Donors cannot request the removal of their name and address but the information will not be used for any purpose other than for compliance with HMRC rules.

### **5. Data minimisation**

- a. CCP (UK) will ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### **6. Accuracy**

- a. CCP (UK) will take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### **7. Archiving / removal**

- a. CCP (UK) will ensure that data is kept for no longer than necessary.
- b. The personal data of host families and volunteers will be retained for no longer than three months after receipt. This period is chosen due to the time taken, in some cases, to complete the DBS checking process. After this period had expired, the data will be permanently deleted from CCP (UK)'s systems.

### **8. Security**

- a. CCP (UK) will ensure that personal data is stored securely using modern software that is kept-up-to-date.

- a. Access to personal data shall be limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- b. When personal data is deleted this will be done safely such that the data is irrecoverable.
- c. Appropriate back-up and disaster recovery solutions are in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

February 2019