

# The Group-based Open Learning Discipleship (GOLD) Project

Charity Number: 1166567

## Data protection policy

Adopted June 2018 (Updated 2021)

### 1. Aims of this Policy

GOLD Project needs to keep certain information on its supporters, students, volunteers, employees, churches and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulation (GDPR - 2018). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

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.

This policy covers data collected in relation to its supporters, students, volunteers, employees, churches and trustees

### 2. Definitions

In line with the General Data Protection Regulation (GDPR), GOLD Project will ensure that personal data will:

- Be obtained fairly and lawfully;
- 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;
- Be subject to the guidelines for international transfer, storage and processing of data.

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.

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 the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **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, the data subject's consent should be explicitly obtained.
- **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.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

### **3. Type of information processed**

GOLD Project processes the following personal information:

- Names and contact details of supporters, donors, students, volunteers, employees, churches and trustees;
- Donors details and details of donations for the purposes of financial accountability (GOLD Project does not collect any personal banking information from donors);
- E-mail addresses of those who relate to GOLD Project on a day-to-day basis;
- Student Marks and Fees records as well as records of bursaries;
- Student Group records.
- Information about religious beliefs of individuals is only collected and stored in relation to the assessment and marking of assignments;
- Information about gender, physical or mental health, and age of clients is only collected to enable GOLD Project to tailor its courses accordingly and to learning provide support where possible.

Personal information is kept in the following forms:

- Electronic Student and Gold Leader Database stored on password protected computers and on GOLD Project's One Drive;
- Personal data stored on MailChimp for the purposes of communication;
- E-mail correspondence;
- Physical files stored in secure files.
- Information on specific students kept with Gold Leaders for the effective administration of their groups.

Groups of people within the organisation who will process personal information are:

- employed and contracted staff;
- trustees
- Gold Leaders

### **4. Responsibilities**

Under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of GOLD Project this is the Board of Trustees.

The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:

- 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

All employed and contracted staff and trustees who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy will result in disciplinary proceedings according to the severity of the offence.

### **5. Policy Implementation**

To meet our responsibilities, staff and trustees will:

- 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;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- 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 will be dealt with swiftly and politely.

## 6. Training

Training and awareness raising about the General Data Protection Regulation (GDPR) and how it is followed in this organisation will take the following forms:

On induction: trustees and staff will be inducted in all relevant policies on joining GOLD Project.

General training/ awareness raising:

- The Director and Administrator will review the processes and issues relating to Data Protection on a regular basis and will be discussed in detail no less than once a year.
- This Data Protection Policy will be reviewed by trustees on a regular basis along with other statutory policies and not less than once every three years.

## 7. Gathering and checking information

Before personal information is collected, we will consider:

- What information will be collected and why it is needed;
- How the information will be stored;
- Procedures for updating information;
- How people can access the information held;
- With whom we will share this information;
- How long we will hold each type of information;
- How to keep information securely.

We will inform people whose information is gathered about the following:

- What information will be collected and why it is needed;
- How the information will be stored;
- How people can update personal details;
- How people can access the information held;
- With whom we will share this information;
- How long we will hold each type of information.

We will take the following measures to ensure that personal information kept is accurate:

- Encourage students to inform us of change of personal details at the start of each course;
- Move towards keeping information on a database where people can update their own personal information online.

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

## 8. Data Security

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:

- Computers where personal information is stored will be password protected;

- Online access to updating personal details will be via people's personal e-mail accounts;
- Access to databases containing personal information will be restricted to authorised staff only;
- Printed or hard copy records of personal information will be stored safely in the GOLD Project office.

Any unauthorised disclosure of personal data to a third party by an employee may result in

- disciplinary proceedings according to the severity of the offence.

Any unauthorised disclosure of personal data to a third party by a volunteer or trustee may result in

- disciplinary proceedings according to the severity of the offence.

## 9. Subject Access Requests

Anyone whose personal information we process has the right to know:

- 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 GDPR.

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.

Individuals have a right 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 Director

The following information may be required before access is granted:

- (In the case of students and ex-students): Name, Date, Place of Study, Courses Studied and Name of Gold Leader;
- (In the case of others): The relationship with the GOLD Project and the information requested.

We may also require proof of identity before access is granted. The following forms of ID will be required:

- Student ID or Letter from Gold Leader

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 GDPR from receiving the written request and relevant identification.

## 10. Adoption and Review

This policy was formally adopted at the trustees meeting June 2018 and Updated June 2021.

This policy will be reviewed at intervals of 3 years to ensure it remains up to date and compliant with the law.

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### Declaration

I confirm I have read and understood GOLD Project's Data Protection Policy and will act in accordance with it.

I am connected with this organisation in my capacity as a

- Member of staff
- Volunteer

Signature:

Print name:

Date:

Please return this form to  
The Director, GOLD Project, PO Box 561, Witney, OX28 9PD

## Document History

<i>Date</i>	<i>Action</i>	<i>Timeframe for Review</i>
June 2018	Formally adopted by GOLD Project Trustees	3 years
21 <sup>st</sup> June 2021	Reviewed and revised by GOLD Project Trustees	3 years
June 2024	Review due by GOLD Project Trustees	3 Years