

## **BEAUMONT SOCIETY DATA PROTECTION POLICY**

Registered Charity No. 1135548

### **Key Details**

- This policy was prepared by: Jane Hamlin
- Approved by the Trustees and Executive Committee on: 15 April 2018
- Policy became operational on: 16<sup>th</sup> April 2018
- Next routine review date: 31<sup>st</sup> May 2019

### **Introduction**

The Beaumont Society (hereafter known as ‘the BS’) needs to gather and use certain information about certain individuals. This will be mainly members, but could include others that the BS has a relationship with, or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the BS’s data protection standards – and comply with the law.

### **Why this policy exists**

This data protection policy ensures the Beaumont Society:

- Complies with data protection law and follows good practice
- Protects the rights of members and partner organisations
- Is open about how it stores and processes individuals’ data
- Protects itself from the risks of a data breach.

### **Data Protection Law**

The Data Protection Act 1998 describes how organisations – including the Beaumont Society – must collect, handle and store personal information.

These rules apply regardless of whether data are stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant, not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also has an adequate level of protection.

## Policy Scope

This policy applies to:

- All members of the BS, including the Executive Committee and Trustees
- All contractors, suppliers and other people working on behalf of the BS.

It applies to all data that the BS holds in relation to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Plus any other information relating to individuals.

## Data Protection Risks

This policy helps protect the BS from some very real data security risks, including:

- **Breaches of confidentiality;** for instance, information being given out inappropriately.
- **Failing to offer choice;** for instance, all individuals should be free to choose how the charity uses data relating to them.
- **Reputational damage;** for instance, the charity could suffer if hackers successfully gained access to sensitive data.

## Responsibilities

Everyone (including volunteers) who works for or with the Beaumont Society has some responsibility for ensuring data is collected, stored and handled appropriately. Each person that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

**The Trustees** are ultimately responsible for ensuring that the Beaumont Society meets its legal obligations, but enacted by the Executive Committee.

**The President** is currently the **Data Protection Officer** and is responsible for:

- ensuring that adequate procedures are in place, and being adhered to;
- keeping the Committee updated about data protection responsibilities, risks and issues;
- reviewing all data protection procedures and related policies;
- handling any data protection questions from anyone else covered by this policy;
- checking and approving any contracts or agreements with third parties that may handle the charity's sensitive data.

**The Membership Secretary**, is the **Data Controller** in charge of data processing and is responsible for:

- dealing with requests from individuals to see the data that the BS holds about them.

## General Guidelines

- The only people able to access data covered by this policy should be those who need it to fulfil their duties.
- Data should not be shared informally. If Regional Organisers need information about members in their region they should make a formal request to the Membership

Secretary with a clear explanation of how the data will be used to promote the aims of the Charity.

All those with access to members' data should keep all data secure, by taking sensible precautions and following the guidelines below:

- Strong passwords should be used, and they should never be shared. Those with access to the database should log in each time and not save the password on their computer.
- Personal data should not be disclosed to unauthorised people, either within the Charity or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If it is no longer required, it should be deleted and disposed of.

### **Data Storage**

These rules describe how and where data should be safely stored.

When data are stored on paper, they should be kept in a secure place where unauthorised people cannot see them.

Data printouts should be shredded and disposed of securely when no longer required.

When information is stored electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords.
- Data should not normally be stored on removable media (like a CD or memory stick) but when it is these should be kept locked away securely when not being used.

### **Data Use**

- Personal data should not be shared informally.
- Personal data must be encrypted before being transferred electronically.

### **Data Accuracy**

The law requires the Beaumont Society to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of anyone within the Charity who works with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

### **Subject Access Requests**

All individuals who are the subject of personal data held by the Beaumont Society are entitled to:

- Ask what information is held about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be aware how the charity is meeting its data protection obligations.

If an individual contact the charity requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email addressed to the data controller at [enquiries@beaumontsociety.org.uk](mailto:enquiries@beaumontsociety.org.uk) – using an email address recognised by the charity - or by post to Beaumont Society, 27 Old Gloucester Street, London, WC1N 3XX enclosing a stamped addressed envelope.

The BS may levy a charge of up to £10 per subject access request. The data controller will aim to provide the relevant data within 28 days of receipt of the request.

The data controller will **always** verify the identity of anyone making a subject access request before releasing any information.

### **Disclosing for other reasons**

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, the Beaumont Society will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Executive Committee and the charity's legal advisers where necessary. We anticipate that there would only be a very remote chance of these circumstances occurring.

### **Providing Information**

The Beaumont Society aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used.
- How to exercise their rights.

To these ends the charity has a privacy policy setting out how data relating to individuals is used by the charity.

This is available on request. The Privacy Policy is also available on the charity's website.

### **Revision**

This policy will be revised in accordance with guidelines as issued by HMG.