

## **Data Protection**

**The Mothers' Union Norwich Diocese is required to process relevant personal data regarding Trustees, members, staff and volunteers as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.**

### **The Principles**

The Mothers' Union Norwich Diocese shall, so far as is reasonably practicable, comply with the Data Protection Principles contained in the **General Data Protection Regulation (GDPR)** from 25th May 2018 to ensure all data is:-

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection.

### **Data Protection Policy**

#### **Personal Data**

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the member of staff's name and address and details for payment of salary. Personal data may also include sensitive personal data as defined in the Act.

#### **Processing of Personal Data**

Consent is not required for members' data to be held where the charity has a 'legitimate interest' to do so.

Consent will be required for the processing of personal data, unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

If a member wishes to revoke or change consent they must agree a specific agreement on how their data is to be processed with the data processor.

The Mothers' Union Norwich Diocese may process some personal data for advertising Mothers Union Norwich Diocese information and fund-raising purposes. Data subjects have the right to request an opt-out to these activities, which must be respected.

Explicit consent is required when collecting images/video and other material for external marketing purposes.

Where data relating to children under the age of 16 is held, specific additional consent will be required from the person who has parental responsibility.

## **Sensitive Personal Data**

The Mothers' Union Norwich Diocese may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings. (Data Protection Act 1998)

## **Rights of Access to Information**

Data subjects have the right of access to information held by the Mothers' Union Norwich Diocese, subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to the Diocesan Administrator. The information will be imparted to the data subject as soon as is reasonably possible after it has come to the Administrator's attention in compliance with the Data Protection Act .

## **Exemption**

Certain data is exempted from the provisions of the Data Protection Act in some circumstances e.g. where it relates to :-

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the Mothers' Union, including Safeguarding.

Any further information on exemptions should be sought from the Data Protection Commission (DPC).

## **Accuracy**

The Mothers' Union Norwich Diocese will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased.

## **Enforcement**

If an individual believes that the Mothers' Union Norwich Diocese has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the member should contact the Diocesan Administrator in the first instance. If a member of staff believes the policy has not been complied with, he or she should contact the Diocesan President in the first instance. If not satisfied with the response or if in need of any advice the Information Commissioner's Office (ICO) should be contacted.

## **Data Security**

The Mothers' Union Norwich Diocese will take appropriate technical and organisational steps to ensure the security of personal data.

All Trustees, members, staff and volunteers will be made aware of this policy and their duties under the Act.

The Trustees, members, staff and volunteers are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite.

**External Processors**

The Mothers’ Union Norwich Diocese must ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and the relevant legislation.

**Retention of Data**

The Mothers’ Union Norwich Diocese will only create and retain personal data where absolutely necessary. Privacy Impact Assessments (PIAs), which include procedures necessary to be used, will be drawn up where applicable. Regular reviews of files will be held and unnecessary or obsolete data will be systematically destroyed.

Data may be retained for differing periods of time for different purposes as required by statute or best practices. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

The Mothers’ Union Norwich Diocese may store some data such as registers, photographs, and other records indefinitely in its archive.

**Secure Destruction**

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

Signed..... Date..... Review date.....