

## Downright Perfect (1200893)

### Data Protection & GDPR Policy

#### **1. Definitions**

- 1.1. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.
- 1.2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

#### **2. Responsibility**

- 2.1. Overall and final responsibility for data protection lies with the Trustees, who are responsible for overseeing activities and ensuring this policy is upheld.
- 2.2. All Trustees and volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

#### **3. Overall policy statement**

- 3.1. Downright Perfect needs to keep personal data about its committee, members, volunteers and supporters in order to carry out group activities.
- 3.2. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the UK General Data Protection Regulation (UK GDPR) and other relevant legislation.
- 3.3. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
- 3.4. We will only collect, store and use data for:
  - 3.4.1. purposes for which the individual has given explicit consent, or
  - 3.4.2. purposes that are in our group's legitimate interests, or
  - 3.4.3. contracts with the individual whose data it is, or
  - 3.4.4. to comply with legal obligations.
- 3.5. We will provide individuals with details of the data we have about them when requested by the relevant individual.
- 3.6. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
- 3.7. We will endeavour to keep personal data up-to-date and accurate.
- 3.8. We will store personal data securely.
- 3.9. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- 3.10. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
- 3.11. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
- 3.12. To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

#### **4. Review**

This policy will be reviewed every two years

Date: 21/05/2023

Signature



Emma Cross, Chair of Trustees

## **Downright Perfect (1159214)**

### **Data Protection Procedure**

#### **1. Introduction**

- 1.1. Downright Perfect has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
- 1.2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

#### **2. General procedures**

- 2.1. Data will be stored securely. When personal data is stored electronically, it will be kept in password protected files. When personal data is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with the UK GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.
- 2.2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
- 2.3. We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

#### **3. Members list**

- 3.1. We will maintain a list of members to enable us to tailor our services, support and events according to the number of children and accessing our support services, their ages and family members.
- 3.2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
- 3.3. We will publish anonymised data regarding the number and demographic of the children and families accessing our services to enable us to seek funding and properly report on the allocation of our funds.

#### **4. Mailing list**

- 4.1. We will maintain a mailing list. This will include the names and contact details of people who wish to receive, publicity, fundraising appeals and event/support information from Downright Perfect.
- 4.2. When people sign up to the mailing list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give separate consent to receive publicity and fundraising messages, and will only send them messages which they have expressly consented to receive.
- 4.3. We will not use the mailing list in any way that the individuals on it have not explicitly consented to.
- 4.4. We will provide information about how to be removed from the list with every mailing.
- 4.5. We maintain our own mailing list.

#### **5. Photographs**

- 5.1. Downright Perfect may take or receive photographs from events organised by Downright Perfect or otherwise.
- 5.2. Where such photographs or images include individuals (adults or children), we will request explicit consent of the individual or, the individual's parent/carer to;
  - 5.2.1. Store the photograph/s, or
  - 5.2.2. Use the photograph/s on our closed Facebook page (only open to parents/carers of children with Down's Syndrome), or
  - 5.2.3. Use the photograph/s on our public Facebook page and other social media, or
  - 5.2.4. Use the photograph/s on our printed literature, or
  - 5.2.5. Use the photograph on our website
- 5.3. From time to time, Downright Perfect may invite parents/carers to send us photographs. We will explicitly state the intended purpose of the photographs within the request. Where a parent/carer responds to such a request, their provision of photographs will act as permission

for Downright Perfect to use the photographs for the purposes explicitly stated without further permission being required.

## **6. Grant Applications / Group therapy sessions**

- 6.1. Downright Perfect offers access for children with Down's Syndrome to therapies through grants and, from time to time, group sessions.
- 6.2. In order to properly operate our grants system, we will request that an application form is completed seeking personal details including the parent and child's names, the child's age and address. Such application will include a request for explicit, signed consent to share personal details with the parents chosen or a prospective therapy provider if the parent/s have asked to be put in touch with a therapy provider.
- 6.3. In order to properly operate our group therapy sessions, we will request that an application form is completed seeking personal details including the parent and child's names, the child's age and address. We will also request information with regards to the child's stage of development and any medical conditions the group leader should be aware of. Such application will include a request for explicit, signed consent to share personal details with the group therapy provider to enable them to properly provide the sessions and, where appropriate/necessary, group children at a similar stage of development together.
- 6.4. We will not keep information relating to an individual's personal situation for any longer than is necessary.

## **7. Attendee records**

- 7.1. Downright Perfect organises events, groups and meet ups. In order to properly organise such events, review whether there is sufficient interest to repeat such events and tailor future events, we will keep attendee records.
- 7.2. Where necessary, we will ask attendees to events to sign in, such sign in sheet will act as a fire log and kept as our attendee record.

## **8. Contacting volunteers**

- 8.1. From time to time we may ask people to volunteer for Downright Perfect in a number of ways.
- 8.2. We will maintain a list of contact details of our recent volunteers. We will share volunteering opportunities and requests for help with the people on this list.
- 8.3. People will be removed from the list if they have not volunteered for the group for 24 months.
- 8.4. To allow volunteers to work together to organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

## **9. Contacting committee members**

- 9.1. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
- 9.2. Committee contact details will be shared among the committee.
- 9.3. Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than Downright Perfect's business, without explicit consent.

## **10. Review**

These procedures will be reviewed every two years

Date: 31.05.2023

Signature



Emma Cross, Chair of Trustees