

rose gale trust

Data Protection Policy

The Rose Gale Trust (Trust) is a grant giving body. Applications for grants are submitted on an application forms; each application is supported by a responsible adult. In order to review a given application, the Trustees may require additional information so as to be able to assess the application and give it the appropriate priority. As a result, the Trust will hold confidential information recorded and recognises the need to manage it responsibly.

Principles

The Trust:

- recognises its responsibilities under the Data Protection Act
- will treat all information submitted by applicants and their supporters in confidence
- may (at its discretion) retain anonymised information from any record to further its work
- will only issue photographs so long as they have received explicit permission to do so and are used are anonymously (i.e. no names issued for anyone in the photograph)
- will ensure that all forms state what why the information recorded is needed, state that the information will be protected in accordance with this policy and state how long the information will be retained
- will not reveal nor discuss any information on any application to anyone other than the applicant and/or their supporter without the express permission of the applicant
- will not retain any information any longer than is required to process it or required to satisfy regulatory bodies (in particular Charity Commission and HMRC).

Definitions

Anonymised: information that derives from a record that has all names removed and the resulting information is not traceable to a specific individual.

Data: information that is recorded in electronic or hard copy format. Data may be a single piece of information or collective (completed form).

Destruction (hard copy): a hard copy record will be destroyed by shredding or burning.

Destruction (electronic copy): files held electronically will be deleted, a search made for any back-up or archive copies made and those copies deleted also. Where practical the media holding the information will be overwritten (e.g. USB stick).

Confidential: any piece of information or data that can be linked directly or indirectly with a named person.

Record: a separate entity (hard copy or electronic) that records data. Examples include (but are not limited to): hard copy - application form, letters, receipts, print off from any electronic record; electronic - files, emails.

Data Protection

The Trust will ensure that data and records:

- are never left unattended in public (except in a locked vehicle)
- when stored, are separated from members of the public behind locks (building and/or cabinet)
- are copied only if absolutely necessary and are destroyed immediately after use.

Data Retention and Destruction

The Trust will only retain information for as long as is required to process it and required to satisfy regulatory bodies (in particular Charity Commission and HMRC).

When no longer required:

- hard copy data and records (including CDs) will be destroyed by shredding or burning
- electronic records will be destroyed by deleting the relevant files. Where the files are also held on backup or archive media (i.e. USB stick) the files will be deleted from all locations.

Use of email

The Trust uses email to communicate between Trustees. The Trustees will delete copies of emails that refer to applications when no longer required - in any case before 1 year.

The Trust's emails will be retained for 2 years and destroyed before 3 years.

The Trust will maintain an email address list and will only remove entries if the Trust no longer requires them or upon demand from the person concerned.

Applications and supporting data

The original applications and supporting data will be retained for at least 2 years but destroyed before 3 years.

The Trust will maintain a summary spreadsheet of grants made. Individual entries will be anonymised on demand.

Other completed forms

All completed forms (except applications) will be retained for at least 2 years but destroyed before 3 years.

Correspondence

Correspondence relating to applications will be treated as the originating application. All other correspondence will only be held as long as it is deemed necessary and will be destroyed as soon as reasonable thereafter.

Applying to the Trust for copies of information

Individuals may ask the Trust to identify what information holds on them. All requests are to be submitted in writing to the address below. The individual may request that the Trust removes information relating to themselves; the Trust undertakes to delete or anonymise the information.

The Trust will not respond to requests from organisations.

Reporting concerns

If any person has any concern regarding the implementation of this policy, they are requested to report the circumstances in confidence to any named Trustee at the Trust's registered address:

Rose Gale Trust c /o 15 Victoria Road Fordingbridge SP6 1DD

The names of the Trustees will be maintained on the Trust's website: www.rosegaletrust.org

Review and distribution of the policy

This policy will be reviewed annually at the AGM and will be published on the Trust's website.

This policy was reviewed and approved at the AGM held on 1 st February 2014

Signed by: Peter Williams, Trustee, Chair of Meeting

(signature on original copy held on file)