

General Data Protection Regulation (GDPR) Policy



1. Introduction

- 1.1. The Eldonian Community Trust ("the Charity") is committed to protecting the privacy and security of personal data. This policy sets out how the Charity collects, uses, stores, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legislation.
- 1.2. The Charity recognises that proper handling of personal data is fundamental to maintaining trust and fulfilling legal obligations. This policy applies to all trustees, staff, volunteers, contractors, and any other individuals handling personal data on behalf of the Charity.

2. Data Protection Principles

- 2.1. The Charity complies with the following key principles of data protection:
 - 2.1.1. Lawfulness, fairness, and transparency: Data is collected and processed lawfully, fairly, and transparently.
 - 2.1.2. Purpose limitation: Data is collected for specific, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
 - 2.1.3. Data minimisation: Only data that is adequate, relevant, and limited to what is necessary is collected.
 - 2.1.4. Accuracy: Reasonable steps are taken to ensure data is accurate and kept up to date.
 - 2.1.5. Storage limitation: Data is retained only for as long as necessary for the purposes for which it was collected.
 - 2.1.6. Integrity and confidentiality: Data is processed securely to protect against unauthorised or unlawful processing, loss, destruction, or damage.
 - 2.1.7. Accountability: The Charity is responsible for demonstrating compliance with these principles.

3. Types of Personal Data Collected

- 3.1. The Charity may collect and process the following types of personal data:
 - 3.1.1. Names, addresses, contact details of trustees, staff, volunteers, beneficiaries, donors and members
 - 3.1.2. Emergency contact and medical information (for youth or vulnerable adult programmes)

3.1.3. DBS and safeguarding documentation where applicable

3.1.4. Financial information related to donations or funding

3.1.5. Photographs or videos (with consent)

3.1.6. Communication records

4. Lawful Bases for Processing

4.1. The Charity will only process personal data where there is a lawful basis under UK GDPR, including:

4.1.1. Consent (freely given, specific, informed, and unambiguous)

4.1.2. Contractual necessity

4.1.3. Legal obligation

4.1.4. Vital interests

4.1.5. Legitimate interests (balancing the Charity's needs with individual rights)

5. Individual Rights

5.1. Individuals have the following rights regarding their personal data:

5.1.1. Right to be informed

5.1.2. Right of access

5.1.3. Right to rectification

5.1.4. Right to erasure (right to be forgotten)

5.1.5. Right to restrict processing

5.1.6. Right to data portability

5.1.7. Right to object

5.1.8. Rights in relation to automated decision-making and profiling

5.1.9. The Charity will respond to data access requests within one calendar month and will not charge a fee unless the request is excessive.

6. Data Sharing and Security

6.1. Personal data will only be shared with third parties where necessary and lawful, such as with safeguarding authorities, funders, or HMRC.

6.2. The Charity will not sell or share personal data for marketing purposes.

- 6.3.** Data is stored securely using appropriate technical and organisational measures, including password protection, locked storage, and access controls.
- 6.4.** Any data breaches will be investigated immediately and reported to the Information Commissioner's Office (ICO) if required.

7. Retention and Disposal

- 7.1.** The Charity will retain personal data only for as long as necessary and in line with retention schedules.
- 7.2.** Personal data that is no longer required will be securely destroyed or permanently deleted.

8. Training and Compliance

- 8.1.** All staff, trustees, and volunteers who handle personal data will be trained on this policy and their responsibilities under GDPR.
- 8.2.** Compliance with this policy is monitored by the Board of Trustees and subject to regular review.

9. Contact and Complaints

- 9.1.** Questions, concerns, or complaints regarding this policy or the Charity's data protection practices should be directed to the Secretary of the Board.
- 9.2.** Individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO) if they believe their data has been misused.

10. Policy Review and Approval

- 10.1.** This policy was approved by the Board of Trustees on Friday 9th May 2025 and will be reviewed annually or as needed to reflect legal or operational changes.