



Privacy Policy

B.I.D.S

BRADFORD INCLUSIVE DISABILITY SERVICE

OVERVIEW OF THE GENERAL DATA PROTECTION REGULATION

The Charity will ensure that all personal data that it holds will be:

- ✓ processed lawfully, fairly and in a transparent manner;
- ✓ collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- ✓ adequate, relevant and limited to what is necessary;
- ✓ accurate and kept up to date;
- ✓ kept in a form which permits identification of data subjects for no longer than is necessary;
- ✓ processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.



B.I.D.S

BRADFORD INCLUSIVE DISABILITY SERVICE

DATA PROTECTION POLICY

Introduction to the GDPR

Under the EU General Data Protection Regulations (GDPR) The Bradford Inclusive Disability Service (herein after referred to as “the Charity”) is required to comply with the GDPR and undertakes to do so.

Throughout this policy document, numbers prefixed by “Art:” in brackets (eg: {Art:5}) refer to the relevant Article(s) in the GDPR.

For ease of access, extracts of relevant GDPR Articles are contained in the Appendix to this Policy.

Definitions {Art:4}

The definitions of terms used in this policy are the same as the definitions of those terms detailed in Article-4 of the GDPR.

Data Subject

A data subject is an identifiable individual person about whom the Charity holds personal data.

Contact Information

For the purposes of this Policy, “Contact Information” means any or all of the person’s: full name (including any preferences about how they like to be called); full postal address; telephone and/or mobile number(s); e-mail address(es); social media IDs/UserNames (eg: Facebook, Skype, Hangouts, WhatsApp)

Principles of the GDPR {Art:5}

The Charity will ensure that all personal data that it holds will be:

processed lawfully, fairly and in a transparent manner in relation to individuals;

collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

BRADFORD INCLUSIVE DISABILITY SERVICE

processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Lawful Processing

The Charity will obtain, hold and process all personal data in accordance with the GDPR for the following lawful purposes.

In all cases the information collected, held and processed will include Contact Information (as defined in 2 above).

By Consent

People who are interested in, and wish to be kept informed of, the activities of the Charity.

Subject to the person's consent, this may include information selected and forwarded by the Charity on activities relevant to those of the Charity by other organisations.

Note: this will not involve providing the person's personal data to another organisation.

The information collected may additionally contain details of any particular areas of interest about which the person wishes to be kept informed.

The information provided will be held and processed solely for the purpose of providing the information requested by the person.

By Contract

People who sell goods and/or services to, and/or purchase goods and/or services from the Charity.

The information collected will additionally contain details of:

The goods/services being sold to, or purchased from the Charity;

Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from the Charity.

The information provided will be held and processed solely for the purpose of managing the contract between the Charity and the person for the supply or purchase of goods/services.

By Legal Obligation

People where there is a legal obligation on the Charity to collect, process and share information with a third party – eg: the legal obligations to collect, process and share with HM Revenue & Customs payroll information on employees of the Charity.

The information provided will be held, processed and shared with others solely for the purpose meeting the Charity's legal obligations.

Employees (Human Resources)

Taxation (HM Revenue & Customs)

For the purpose of managing an employee's PAYE and other taxation affairs the information collected will additionally contain details, as required by HM Revenue & Customs, of:

The person's National Insurance Number;

The person's taxation codes;

BRADFORD INCLUSIVE DISABILITY SERVICE

The person's salary/wages, benefits, taxation deductions & payments;
Such other information as may be required by HM Revenue & Customs.

Pensions

For the purpose of managing an employee's statutory pension rights the information collected will additionally contain details, as required by the Charity's pension scheme (National Employees Savings Trust, NEST), of:

The person's National Insurance Number;
The person's salary/wages, benefits, taxation & payments;
Such other information as may be required by the NEST scheme.

By Vital Interest

The Charity undertakes no activities which require the collection, holding and/or processing of personal information for reasons of vital interest.

By Public Task

The Charity undertakes no public tasks which require the collection, holding and/or processing of personal information.

Legitimate Interest

Volunteers, Including Trustees

In order to be able to operate efficiently, effectively and economically, it is in the legitimate interests of the Charity to hold such personal information on its volunteers and trustees as will enable the Charity to communicate with its volunteers on matters relating to the operation of the charity, eg:

- the holding of meetings;
- providing information about the Charity's activities – particularly those activities which, by their nature, are likely to be of particular interest to individual volunteers/trustees;
- seeking help, support and advice from volunteers/trustees, particularly where they have specific knowledge and experience;
- ensuring that any particular needs of the volunteer/trustee are appropriately and sensitively accommodated when organising meetings and other activities of the Charity.

Closed Circuit TV (CCTV) Recording

The Charity collects video CCTV images of people entering and moving around its premises in order to safeguard its collection from theft and vandalism, as required by its insurers.

The information collected is only processed and, where appropriate, shared with other authorities (eg: the Police) where it is necessary to investigate a potential crime.

Individual Rights

Note: The following clauses are taken primarily from the guidance provided by the Office of the Information Commissioner,
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

BRADFORD INCLUSIVE DISABILITY SERVICE

The right to be informed {Arts 12-14}

When collecting personal information the Charity will provide to the data subject free of charge, a Privacy Policy written in clear and plain language which is concise, transparent, intelligible and easily accessible containing the following information:

- ✓ Identity and contact details of the controller
Note: where the organisation has a controller's representative and/or a data protection officer, their contact details should also be included
- ✓ Purpose of the processing and the lawful basis for the processing
- ✓ The legitimate interests of the controller or third party, where applicable
- ✓ Categories of personal data
Not applicable if the data are obtained directly from the data subject
- ✓ Any recipient or categories of recipients of the personal data
- ✓ Details of transfers to third country and safeguards
- ✓ Retention period or criteria used to determine the retention period
- ✓ The existence of each of data subject's rights
- ✓ The right to withdraw consent at any time, where relevant
- ✓ The right to lodge a complaint with a supervisory authority
- ✓ The source the personal data originates from and whether it came from publicly accessible sources
Not applicable if the data are obtained directly from the data subject
- ✓ Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data
Not applicable if the data are NOT obtained directly from the data subject
- ✓ The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

In the case of data obtained directly from the data subject, the information will be provided at the time the data are obtained.

In the case that the data are not obtained directly from the data subject, the information will be provided within a reasonable period of the Charity having obtained the data (within one month), *or*,

if the data are used to communicate with the data subject, at the latest, when the first communication takes place; *or*

if disclosure to another recipient is envisaged, at the latest, before the data are disclosed.

The right of access {Art:15}

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to his/her personal data and the information detailed in the Charity's relevant Privacy Policy:

The right to rectification {Art:16}

The data subject shall have the right to require the controller without undue delay to rectify any inaccurate or incomplete personal data concerning him/her.

BRADFORD INCLUSIVE DISABILITY SERVICE

The right to erase {The right to be forgotten} {Art:17}

Except where the data are held for purposes of legal obligation or public task (4.3 or 4.5) the data subject shall have the right to require the controller without undue delay to erase any personal data concerning him/her.

Note: This provision is also known as “The right to be forgotten”.

The right to restrict processing {Art:18}

Where there is a dispute between the data subject and the Controller about the accuracy, validity or legality of data held by the Charity the data subject shall have the right to require the controller to cease processing the data for a reasonable period of time to allow the dispute to be resolved.

The right to data portability {Art:20}

Where data are held for purposes of consent or contract (4.1 or 4.2) the data subject shall have the right to require the controller to provide him/her with a copy in a structured, commonly used and machine-readable format of the data which he/she has provided to the controller, and have the right to transmit those data to another controller without hindrance.

The right to object {Art:21}

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him/her which is based on Public Task or Legitimate Interest (4.5 or 4.6), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

At the latest at the time of the first communication with the data subject, the right referred to in paragraphs a) and d) shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

Rights in relation to automated decision making and profiling. {Art:22}

Except where it is: a) based on the data subject's explicit consent, or b) necessary for entering into, or performance of, a contract between the data subject and a data controller; the data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

OPERATIONAL POLICIES AND PROCEDURES

Operational Policies & Procedures – The Context

The Bradford Inclusive Disability Service (the Charity) is a small charity holding just a small amount of non-sensitive data on a small number of people.

The Trustees understand and accept their responsibility under the EU General Data Protection Regulation (GDPR) to hold all personal data securely and use it only for legitimate purposes with the knowledge and approval of the data subjects.

By the following operational policies and procedures the Trustees undertake to uphold the principles and requirements of the GDPR in a manner which is proportionate to the nature of the personal data being held by the Charity. The policies are based on the Trustees' assessment, in good faith, of the potential impacts on both the Charity and its data subjects of the personal data held by the Charity being stolen, abused, corrupted or lost.

Personnel

Data Protection Officer

In the considered opinion of the Trustees the scope and nature of the personal data held by the Charity is not sufficient to warrant the appointment of a Data Protection Officer.

Accordingly, no Data Protection Officer is appointed.

Data Controller

The Board of Trustees is the Data Controller for the Charity.

Data Processor

The Board of Trustees will appoint at least 2 and not more than 5 of its number, or other appropriate persons, to be the Data Processors for the Charity.

The Charity will not knowingly outsource its data processing to any third party (eg: Google G-Suite, Microsoft OneDrive) except as provided for in the section "Third Party Access to Data".

Access to Data

Except where necessary to pursue the legitimate purposes of the Charity, only the Data Processors shall have access to the personal data held by the Charity.

Training

The Board of Trustees and Data Processors will periodically undergo appropriate training commensurate with the scale and nature of the personal data that the Charity holds and processes under the GDPR.

Collecting & Processing Personal Data

The Charity collects a variety of personal data commensurate with the variety of purposes for which the data are required in the pursuit of its charitable objects.

All personal data will be collected, held and processed in accordance with the relevant Data Privacy Notice provided to data subjects as part of the process of collecting the data.

BRADFORD INCLUSIVE DISABILITY SERVICE

A Data Privacy Notice will be provided, or otherwise made accessible, to all persons on whom the Charity collects, holds and processes data covered by the GDPR. The Data Privacy Notice provided to data subjects will detail the nature of the data being collected, the purpose(s) for which the data are being collected and the subjects rights in relation to the Charity's use of the data and other relevant information in compliance with the prevailing GDPR requirements.

Information Technology

Data Protection by Design/Default

Inasmuch as:

none of the Charity's volunteer Trustees are data protection professionals;

it would be a disproportionate use of charitable funds to employ a data protection professional, given the scale and nature of the personal data held by the Charity;

the Trustees will seek appropriate professional advice commensurate with its data protection requirement whenever:

they are planning to make significant changes to the ways in which they process personal data;

there is any national publicity about new risks (*eg:* cyber attacks)

which might adversely compromise the Charity's legitimate processing of personal data covered by the GDPR.

Personal data will never be transmitted electronically (*eg:* by e-mail) unless securely encrypted.

Data Processing Equipment

The scale and nature of the personal data held by the Charity is not sufficient to justify the Charity purchasing dedicated computers for the processing of personal data.

Instead the Charity will purchase and own at least 2 and not more than 5 removable storage devices to store the personal data that it holds and processes.

The removable storage devices will also act as backup devices.

Whilst the data will be processed on the computers/laptops to which the Data Processors have access, no personal data covered by the GDPR will be stored on those computers/laptops. All interim working data transferred to such computers/laptops for processing will be deleted once processing has been completed.

When not in use the removable storage devices will be kept in a secure location and reasonably protected against accidental damage, loss, avoidable theft or other misuse by persons other than the Data Processors.

The Data Controller & Data Processors will keep a register of

- (a) the location of all removable devices used for the storage and processing of personal data;
- (b) each occasion when the data on each device were accessed or modified and by whom.

The Charity's removable storage devices shall not be used for the storage of any data which are unrelated to the Charity's processing of personal data.

Data Processing Location

Data Processors shall only process the Charity's personal data in a secure location, and not in any public place, *eg:* locations where the data could be overlooked by others, or the removable data storage devices would be susceptible to loss or theft.

BRADFORD INCLUSIVE DISABILITY SERVICE

Computers/laptops in use for data processing will not be left unattended at any time.

Data Backups

To protect against loss of data by accidental corruption of the data or malfunction of a removable data storage device (including by physical damage), all the Charity's personal data shall be backed up periodically and whenever any significant changes (additions, amendments, deletions) are made to the data.

Backup copies of the data shall be held in separate secure locations which are not susceptible to common risks (eg: fire, flood, theft).

As far as is reasonably practical, all files containing personal data covered by the GDPR will be encrypted by the use of HNC-Meo, Kaspersky Vault or other comparable software.

The encryption keys will be held securely in a location which is separate from the data storage media.

Obsolete or Dysfunctional Equipment (Disposal of Removable Storage Media)

Equipment used to hold personal data, whether permanently or as interim working copies, which come to the end of their useful working life, or become dysfunctional, shall be disposed of in a manner which ensures that any residual personal data held on the equipment cannot be recovered by unauthorised persons.

Inasmuch as:

this will be a relatively infrequent occurrence;

techniques for data recovery and destruction are constantly evolving;

none of the Trustees have relevant up-to-date expert knowledge of data cleansing;

equipment which becomes obsolete or dysfunctional shall not be disposed immediately.

Instead it will be stored securely while up-to-date expert advice on the most appropriate methods for its data cleansing and disposal can be sought and implemented.

Data Subjects

The Rights of Data Subjects

In compliance with the GDPR the Charity will give data subjects the following rights.

These rights will be made clear in the relevant Data Privacy Notice provided to data subjects:

- ✓ the right to be informed;
- ✓ the right of access;
- ✓ the right to rectification;
- ✓ the right of erasure {LO} Also referred to as "The right to be forgotten"
- ✓ the right to restrict processing;
- ✓ the right to data portability; {LO} {LI}
- ✓ the right to object; {SC} {Co} {LO}
- ✓ the right not to be subjected to automated decision making, including profiling.

The above rights are not available to data subjects when the legal basis on which the Charity is holding & processing their data are:

{SC} Subject Consent;	{Co} Contractual
obligation	{LO} Legal Obligation
Interest	{LI} Legitimate

BRADFORD INCLUSIVE DISABILITY SERVICE

Rights of Access, Rectification and Erasure

Data subjects will be clearly informed of their right to access their personal data and to request that any errors or omissions be corrected expeditiously.

Such access shall be given and the correction of errors or omissions shall be made free of charge provided that such requests are reasonable and not trivial or vexatious.

There is no prescribed format for making such requests provided that:

the request is made in writing, signed & dated by the data subject (or their legal representative);

the data claimed to be in error or missing are clearly and unambiguously identified;

the corrected or added data are clear and declared by the subject to be complete and accurate.

It will be explained to subjects who make a request to access their data and/or to have errors or omissions corrected, or that their data be erased, that, while their requests will be actioned as soon as is practical there may be delays where the appropriate volunteers or staff to deal with the request do not work on every normal weekday.

Where a data subject requests that their data be rectified or erased the Data Controller and Data Processor will ensure that the rectifications or erasure will be applied to all copies of the subject's personal data including those copies which are in the hands of a Third Party for authorised data processing.

Right of Portability

The Charity will only provide copies of personal data to the subject (or the subject's legal representative) on written request.

The Charity reserves the right either:

to decline requests for portable copies of the subject's personal data when such requests are unreasonable (ie: excessively frequent) or vexatious;

or

to make a reasonable charge for providing the copy.

Data Retention Policy

Personal data shall not be retained for longer than:

In the case of data held by subject consent:

the period for which the subject consented to the Charity holding their data;

in the case of data held by legitimate interest of the charity:

the period for which that legitimate interest applies. For example: in the case of data subjects who held a role, such as a volunteer, with the Charity the retention period is that for which the Charity reasonably has a legitimate interest in being able to identify that individual's role in the event of any retrospective query about it;

in the case of data held by legal obligation:

the period for which the Charity is legally obliged to retain those data.

The Charity shall regularly – not less than every 6 months – review the personal data which it holds and remove any data where retention is no longer justified. Such removal shall be made as soon as is reasonably practical, and in any case no longer than 20 working days (of the relevant Data Processor) after retention of the data was identified as no longer justified.

BRADFORD INCLUSIVE DISABILITY SERVICE

Privacy Impact Assessment

Trustees' Data

The volume of personal data is very low – less than 15 individuals

The sensitivity of the data is low-moderate: the most sensitive data being date of birth, previous names and previous addresses;

The risk of data breach is small as the data are rarely used, with the majority of the data being held for a combination of legal obligation and legitimate interest.

Overall impact: LOW

Volunteers'/Members' Data

The volume of personal data is low – less than 100 individuals

The sensitivity of the data is low: the most sensitive data being an e-mail address;

The risk of data breach is small – primarily the accidental disclosure of names & e-mail addresses.

Overall impact: LOW

Supporters' & Enquirers' Data

The volume of personal data is low-moderate.

The sensitivity of the data is low: the most sensitive data being an e-mail address;

The risk of data breach is small – primarily the accidental disclosure of names & e-mail addresses.

Overall impact: LOW

Est. 1975 Re-Est. 2020
Charity No. 503944

B.I.D.S

BRADFORD INCLUSIVE DISABILITY SERVICE

BRADFORD INCLUSIVE DISABILITY SERVICE

Third Party Access to Data

Under no circumstance will the Charity share with, sell or otherwise make available to Third Parties any personal data except where it is necessary and unavoidable to do so in pursuit of its charitable objects as authorised by the Data Controller.

Whenever possible, data subjects will be informed in advance of the necessity to share their personal data with a Third Party in pursuit of the Charity's objects.

Before sharing personal data with a Third Party the Charity will take all reasonable steps to verify that the Third Party is, itself, compliant with the provisions of the GDPR and confirmed in a written contract. The contract will specify that:

- ✓ The Charity is the owner of the data;
- ✓ The Third Party will hold and process all data shared with it exclusively as specified by the instructions of the Data Controller;
- ✓ The Third Party will not use the data for its own purposes;
- ✓ The Third Party will adopt prevailing industry standard best practice to ensure that the data are held securely and protected from theft, corruption or loss;
- ✓ The Third Party will be responsible for the consequences of any theft, breach, corruption or loss of the Charity's data (including any fines or other penalties imposed by the Information Commissioner's Office) unless such theft, breach, corruption or loss was a direct and unavoidable consequence of the Third Party complying with the data processing instructions of the Data Controller
- ✓ The Third Party will not share the data, or the results of any analysis or other processing of the data with any other party without the explicit written permission of the Data Controller;
- ✓ The Third Party will securely delete all data that it holds on behalf of the Charity once the purpose of processing the data has been accomplished.
- ✓ The Charity does not, and will not, transfer personal data out of the EU.

Data Breach

In the event of any data breach coming to the attention of the Data Controller the Trustees will immediately notify the Information Commission's Office.

In the event that full details of the nature and consequences of the data breach are not immediately accessible (eg: because Data Processors do not work on every normal weekday) the Trustees will bring that to the attention of the Information Commissioner's Office and undertake to forward the relevant information as soon as it becomes available.

Privacy Policy & Privacy Notices

The Charity will have a Privacy Policy and appropriate Privacy Notices which it will make available to everyone on whom it holds and processes personal data, in accordance with 5.1.

In the case of data obtained directly from the data subject, the Privacy Notice will be provided at the time the data are obtained.

In the case that the data are not obtained directly from the data subject, the Privacy Notice will be provided within a reasonable period of the Charity having obtained the data (within one month), *or*,

if the data are used to communicate with the data subject, at the latest, when the first communication takes place; *or*

if disclosure to another recipient is envisaged, at the latest, before the data are disclosed.

PRIVACY POLICY: TRUSTEES

TRUSTEE PERSONAL DATA

WE HOLD THE FOLLOWING PERSONAL INFORMATION ABOUT YOU IN ACCORDANCE WITH THE EU GENERAL DATA PROTECTION REGULATION (GDPR) AND ACCOMPANYING PRIVACY NOTICE. SEE ACCOMPANYING GUIDANCE ON COMPLETING THE FORM
KEY TO LEGAL BASIS FOR PROCESSING: LO=LEGAL OBLIGATION; LI=LEGITIMATE INTEREST; SC=SUBJECT CONSENT

Please write clearly		LO	LI	SC
Title:		✓	✓	
Given Name(s)		✓	✓	
Family Name		✓	✓	
Qualifications		x	✓	
Honours		x	✓	
Preferred Name	<i>Optional:</i>	x	✓	
Date Appointed Retired/Resigned	<i>You do not need to enter this information in this box. The Charity will add this information itself.</i>	✓	✓	
Previous Name(s)		✓	x	
Date of Birth		✓	x	
Current Address Street address Address line 2, if required Town/City Post/Zip Code Country Date moved to this address		✓	✓	
Previous Address Street address Address line 2, if required Town/City Post/Zip Code Country Date moved to this address	<i>Only required if you have lived at other addresses in the last 5 yrs. Continue on a separate sheet if necessary.</i>	✓	x	
Phone Number(s)		x	✓	
E-mail Address(es)		x	✓	
National Insurance No:		✓	x	

BRADFORD INCLUSIVE DISABILITY SERVICE

Please write clearly		LO	LI	SC
Trustee of any other charity	YES / NO <i>(Delete as appropriate)</i>	✓	✓	
Conflicts of Interest	<i>Continue on a separate sheet if necessary.</i>	x	✓	
Personal Experience, Expertise & Interests	<i>Optional: Continue on a separate sheet if necessary.</i>	x	✓	
Special Needs	<i>Optional: Continue on a separate sheet if necessary.</i>	x	✓	
Any other information that you believe it is appropriate for the Charity to know.	<i>Optional: Continue on a separate sheet if necessary.</i>	x	x	

Optional Data:

Note: Whilst you are under no obligation to provide the Charity with your personal information marked as “Optional”, if you do not provide it and give the Charity your consent to use it the Charity will be unable to make special arrangements where appropriate, eg: ensuring that you are addressed in the manner you would wish if you do not provide and give consent for the use of your preferred name, or ensuring that any access or dietary requirements are accommodated if you do not provide and give consent for the use of your special needs information.

Data Subject Consent to Use of Personal Data

I confirm that I am happy for the Charity to hold my above personal data and to use it for the purposes described in the accompanying Privacy Notice.

Signed: Date:/...../201.....

BRADFORD INCLUSIVE DISABILITY SERVICE

Confidential Trustee Information

GUIDANCE ON COMPLETING THE FORM

From time to time the charity will be under a legal obligation to provide to other organisations some personal details of Trustees and, occasionally, others who have key executive roles in the Charity. For example: when registering the Charity with the Charity Commission, HM Revenue & Customs or opening a bank account.

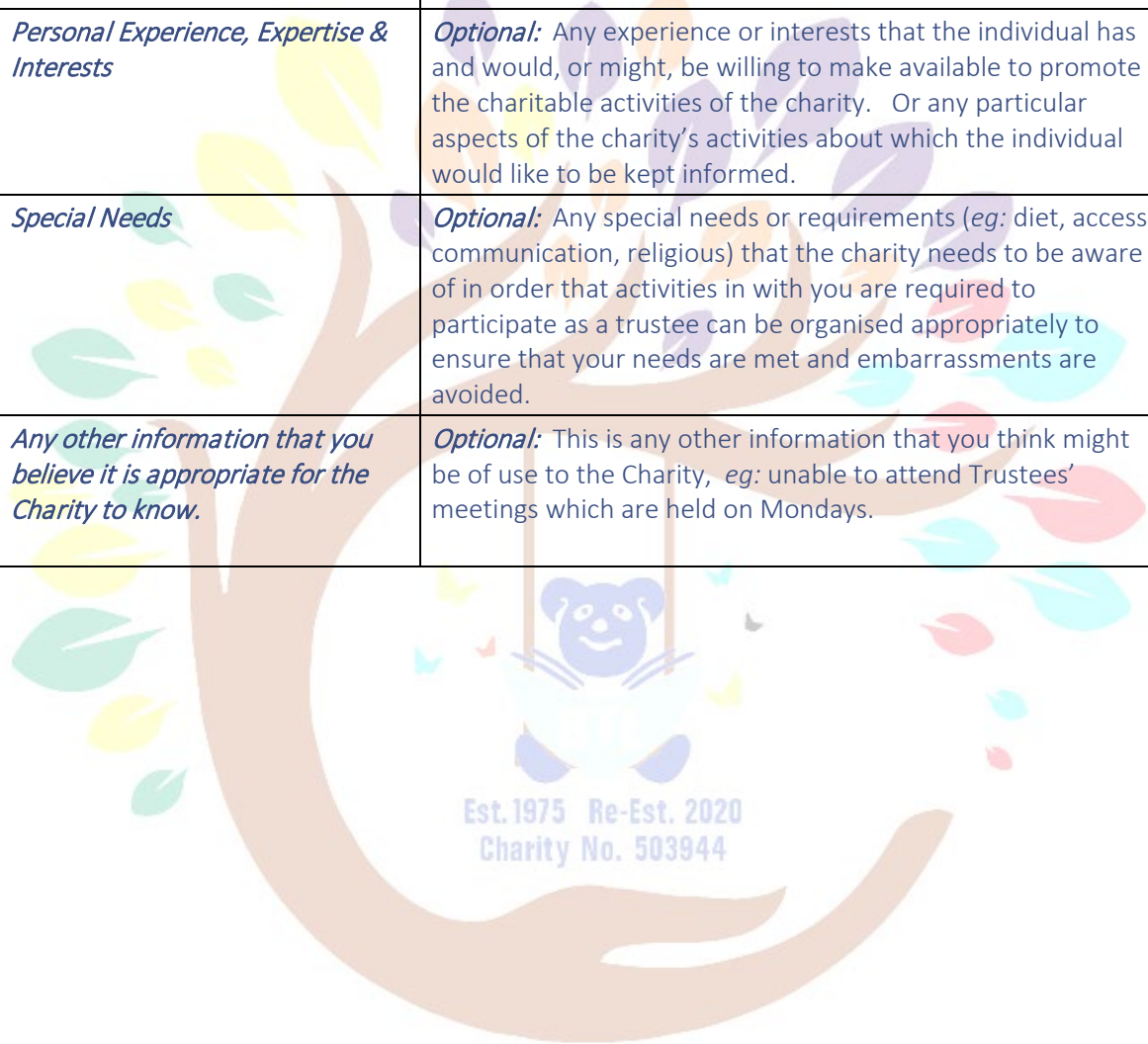
Not all of the following information will be required on every occasion. But it will save you (and everyone) time and hassle in the long-term if the Charity collects all the information “up front”.

As the information is of a personal nature it comes within the provisions of the EU General Data Protection Regulation (GDPR). As such it will be held securely and only used for lawful purposes in accordance with the requirements of the GDPR.

Title:	Mr; Ms; Mrs; Dr; Prof; Revd; Sir; <i>etc.</i>
Given Name(s)	First name; Middle names (if any)
Family Name	Surname
Qualifications	BA; MA; PhD; FCA; FRCO; <i>etc</i>
Honours	OBE; MBE; <i>etc</i>
Preferred Name	<i>eg:</i> if given names are John Andrew Smith but you prefer to be called Andy Smith.
Date Appointed Retired/Resigned	Day-Month-Year: <i>eg:</i> 01-January-2005
Previous Name(s)	Any name by which you have previously been known – <i>eg:</i> change of name by deed poll; the maiden name of a married woman.
Date of Birth	Day-Month-Year: <i>eg:</i> 01-January-1963
Current Address Street address Address line 2, if required Town/City Post/Zip Code Country Date moved to this address	
Previous Address(es)	Repeat the above details for any address(es) you have lived at in the last 5 years.
Phone Number(s)	Home; Office; Mobile (At least one is desirable – any additional numbers are optional)
E-mail Address(es)	The address to which e-mails relating to charity business & activities can be sent.
National Insurance No:	NIC number, or other national identification if not a UK citizen.
Trustee of any other charity	Only Yes / No is required. You don't have to name the other charities.
Conflicts of Interest	Any involvement with other persons or organisations which could lead to a conflict of interest (<i>eg:</i> a relative who is a potential beneficiary; an organisation which is a potential supplier to the charity).

BRADFORD INCLUSIVE DISABILITY SERVICE

	<p>This is for potential conflicts of interest of an on-going or long-term nature. Reporting conflicts of interest here does NOT mean that you are not required to report potential conflicts of interest of a more <i>ad hoc</i> nature which arise in the future.</p>
<p><i>Personal Experience, Expertise & Interests</i></p>	<p><i>Optional:</i> Any experience or interests that the individual has and would, or might, be willing to make available to promote the charitable activities of the charity. Or any particular aspects of the charity's activities about which the individual would like to be kept informed.</p>
<p><i>Special Needs</i></p>	<p><i>Optional:</i> Any special needs or requirements (eg: diet, access, communication, religious) that the charity needs to be aware of in order that activities in with you are required to participate as a trustee can be organised appropriately to ensure that your needs are met and embarrassments are avoided.</p>
<p><i>Any other information that you believe it is appropriate for the Charity to know.</i></p>	<p><i>Optional:</i> This is any other information that you think might be of use to the Charity, eg: unable to attend Trustees' meetings which are held on Mondays.</p>



B.I.D.S
BRADFORD INCLUSIVE DISABILITY SERVICE

BRADFORD INCLUSIVE DISABILITY SERVICE

It is important to us that you understand and are happy with how we use your information.
Please take time to read this policy in full.

1. *Identity and contact details of the controller.*

The Charity's Data Controller is the Board of Trustees of Small Charity Support

The Controller can be contacted via: The Principal Trustee, Small Charity Support,
46 Farm Road, Edgware HA8 9LT

Phone: 020-8958 6801; e-mail: Enquiries@smallcharitysupport.uk

2. *Data Subjects*

This Privacy Policy applies to all trustees of the Charity.

3. *Purpose of the processing and the lawful basis for the processing*

The charity will only hold and process personal data on bases which are lawful.

The same personal data may be held and processed for different purposes and, therefore, under different lawful bases, as identified on the form used to collect the data from the subject.

The lawful bases and purposes under which personal data may be processed by the charity are as follows.

4. *Legal Obligation {LO}*

The charity holds and processes the personal data, identified as LO, to enable the charity to comply with relevant legislation regarding the identity of persons who have a significant role in the governance of the charity.

Data held under legal obligation will only be processed for the relevant purposes as is required by law and will only be shared with other organisations (eg: Charity Commission; HM Revenue & Customs) as is allowed by law and which are compliant with the General Data Protection Regulation. This will include the sharing of personal data which are, by law, destined for the public domain (eg: the names of trustees to be held and displayed in the Charity Commission's public Register of Charities).

5. *Legitimate Interest {LI}*

The charity legitimately needs to hold the personal data, identified as LI, about its trustees for the purpose of administering the charity efficiently, effectively and economically in pursuit of its charitable purposes.

This will include, but is not limited to, the communication of information relevant to the governance and administration of the charity to and between trustees, and the sharing of knowledge and expertise between trustees specifically to further the legitimate interests of the Board of Trustees for the benefit of the charity.

6. *Subject Consent {SC}*

In your wider role as a member/supporter of the charity we may, subject to your consent, use your personal data to keep you informed of the wider activities of the charity, particularly those in which you have special experience and/or expertise or in which you have expressed a particular interest. This will include providing you with information relating to any fundraising activities which the charity undertakes.

BRADFORD INCLUSIVE DISABILITY SERVICE

Your personal data will also be used to ensure that any activities which you are required, or are invited, to participate in are appropriately tailored to any specific needs that you have and, where appropriate, any potential for embarrassment is avoided.

The charity will not share your personal data with any other individual, group or organisation for any purpose other than those which are directly related to the activities and charitable purposes of the charity.

7. *The right to withdraw consent at any time*

You have the right to withdraw your consent for the charity's use of your personal data which are provided by you with your consent for use by the charity for promoting its general activities and purposes.

You do not have the right to withdraw your consent for the charity's use of your personal data when the lawful basis for the charity holding and processing the data is either "Legal Obligation" or "Legitimate Interest".

8. *The right to require the erasure of your data (right to be forgotten)*

You have the right to require the charity to erase any or all of your personal data which are held by the charity for processing on the lawful basis of Legitimate Interest or Subject Consent.

You do not have the right to require the charity to erase any of your personal data held by the charity when the charity's lawful basis for holding and processing the data is "Legal Obligation".

9. *The right to restrict processing*

You have the right to require the charity to stop processing your data if you reasonably believe that there are significant inaccuracies in the data that we hold or that the way in which we process your data produces inaccurate results

10. *The right to portability*

You have the right to require the charity to provide you with a printed or computer-readable copy (*ie:* in a standard format which will allow the data to be transferred to another computer) of your personal data that it holds for processing on the basis of Legitimate Interest.

You do not have the right to require the charity to provide you with portable copies of data which it holds for the lawful purposes of Legal Obligation or Subject Consent.

11. *The legitimate interests of the controller or third party, where applicable*

12. *Legitimate interests of the controller*

The legitimate interests of the Controller (on behalf of the trustees of the charity) are:

To ensure that the human resources available to the charity – both volunteers (including trustees) and employees – are used effectively, efficiently and economically to pursue the purposes of the charity for the public benefit;

To promote and facilitate communication, cooperation and the sharing of experience and expertise between trustees, other volunteers, employees, beneficiaries and donors

13. *Legitimate interest of third parties*

The legitimate interests of third parties are to ensure that the interests and well-being of the data subject are properly met when the charities activities are carried out by the third party (*eg:* providing transport to/from events, providing food and accommodation).

BRADFORD INCLUSIVE DISABILITY SERVICE

14. Any recipient or categories of recipients of the personal data

We may share your personal data:

with the Charity Commission, HM Revenue & Customs, the Police, local authorities, the Courts and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime.

with the Charity's professional advisors (eg: our lawyers, accountants) when they need it to provide appropriate advice on the charity's activities. We will seek your permission before sharing your personal data in this way.

where we are legally obliged to do so, eg: to comply with a court order.

with other people who make a reasonable subject access request to us, provided that we are allowed to do so by law.

15. Retention period or criteria used to determine the retention period

Your personal data processed on the basis of Legal Obligation and shared with HM Revenue & Customs are retained for the prevailing statutory period (currently 6 years).

Your personal data processed on the basis of Legal Obligation and shared with the Charity Commission are retained for 3 years after you cease to be a Trustee.

Your personal data processed on the basis of Legitimate Interest are retained for 2 years after you cease to be a Trustee.

Your personal data processed on the basis Subject Consent are retained for 3 months after you cease to be a Trustee.

16. Details of transfers to third country and safeguards

The Charity does not transfer any personal data to third countries.

17. The existence of each of data subject's rights

Other than the right to withdraw consent and the right to erasure you have all the data subject rights, as prescribed by the General Data Protection Regulation, namely: The rights:

- a) to be informed about the your personal data held by the Data Controller on behalf of the Charity, the purpose(s) for which they are held; the manner in which they are processed; the recipients (if any) of the data;
- b) to be given access to your personal data;
- c) to rectification – the correction of any error in the data and/or the completion of any incomplete data;
- d) to restrict processing – while you have legitimate justifiable concerns about the accuracy, validity or legality of data held by the Charity or the way in which the data are being processed. Data process may be resumed once either the cause(s) of the concern has(have) been rectified or your concerns are demonstrated to be unjustified.
- e) to object to processing – while you have reasonable grounds relating to their impact on your particular circumstances and where the legal basis of the processing is Public Task or Legitimate Interest. However, the processing of your data can be resumed if the Data Controller can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims;

18. The source the personal data originates from and whether it came from publicly accessible sources

Your personal data are not obtained from anyone other than yourself.

19. Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data

The provision of your personal data for this is a statutory requirements under UK taxation and charity legislation.

Failure to provide the data, or the provision of data which are inaccurate or late, render both you and the Charity to significant penalties or legal action.

20. The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

The Charity does not use any automated decision-making software in the processing of your personal data. Nor will the charity make your personal data available to any other organisation for such purposes.

21. The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for the UK, if you are dissatisfied with the way that the Charity is collecting, holding, processing and using your personal data and you feel that your reasonable attempts to raise the issues and get them addressed have failed.

22. Is your information secure?

We take the security of your information very seriously.

We comply with the relevant prevailing legislation which requires us to have in place appropriate security measures at all times, including where we share your information with others.

23. What additional information do we collect and when?

In addition to the statutory information that we collect, hold and process for the purpose of managing the charity's legal obligations and legitimate interests affairs we also collect and hold:

All information you choose to submit to us when you communicate to us by post, e-mail, messaging, or other form of image-based (eg: photographs), sound-based (eg: sound files) or text-based communication, whether physical (eg: ink & paper) or electronic.

Copies of any notes that we take, whether physical (eg: ink & paper) or electronic, during verbal communications between us (eg: telephone; Skype®; Hangouts®).

Information on what we communicate to you by post, e-mail, messaging, or other form of image-based or text-based communication whether physical (eg: ink & paper) or electronic, including information in all ancillary materials (eg: attachments, images, brochures).

24. Updates to this policy

We will need to update this policy from time to time as our services change.

We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise, please check the Small Charity Support website for notifications of significant changes to this policy.

If you do not notify us that you wish the information that we hold on you to be deleted (ie: to have no further contact with us) we will take it that you accept the changes.

PRIVACY NOTICE: PARTICIPANTS IN ACTIVITIES

It is important to us that you understand and are happy with how we use your information.
Please take time to read this Privacy Notice in full.

Data Subjects

are people like you, who take part in our activities.

What we do with your personal data?

We use your personal data to help us organise the sort of activities that you like to come to, and to keep you informed about those activities. We can do this because we have a legitimate interest in knowing who is participating in our activities and in being able to share with them details of our activities (including any changes) and related activities.
Additional optional information we only keep and use with your consent.

Your right to withdraw consent at any time

You can tell us that you no longer wish us to use your data in this way and, if you do, we must stop using it as soon as is reasonably practical

Your right to require the erasure of your data (right to be forgotten)

If you no longer wish us to have or use your data you can tell us to remove your data completely from our records and we must do so as soon as is reasonably practical

Who gets to see your personal data?

We only share your personal data with other people when it is necessary to do so in order for us to run our activities efficiently and in the way that you would like.
We do not share your data with anyone else.

How long do we keep your personal data?

We only keep your personal data while you come to our activities, either regularly or from time-to-time.
If we have not seen you at one of our activities for 2 years we will delete your data.

We do not transfer your personal data to other countries

The existence of each of your rights

Under the General Data Protection Regulation you have the following rights:

- to be told about what data we have, how and what we use it for, and who we share it with (as we are doing in this Privacy Notice);
- to be given access to your personal data;
- to have any errors corrected or incomplete data completed;
- to stop us using your data if you think our use is unjustified or the data are inaccurate.

Your legal obligation

You are under no legal obligation to give us your personal data if you do not wish to.

The existence of automated decision making, including profiling

The Charity does not use computers to analyse your data in order to make computer decisions about what communications the charity should, or should not, send to you.

The right to complain to the UK Information Commissioner's Office:

if you are dissatisfied with the way that the Charity is collecting, holding, processing and using your personal data you are entitled to complain to the Information Commission.

BRADFORD INCLUSIVE DISABILITY SERVICE

Identity and contact details of the controller.

The Charity's Data Controller is the Board of Trustees of Small Charity Support

The Controller can be contacted via: The Principal Trustee, Small Charity Support,
46 Farm Road, Edgware HA8 9LT

Phone: 020-8958 6801; e-mail: Enquiries@smallcharitysupport.uk



B.I.D.S

BRADFORD INCLUSIVE DISABILITY SERVICE

BRADFORD INCLUSIVE DISABILITY SERVICE

PARTICIPANTS: PERSONAL DATA

We hold the following personal information about you in accordance with the EU General Data Protection Regulation (GDPR) and the Privacy Notice overleaf.

Key to Legal Basis for processing: LI=Legitimate Interest; Op=Optional; SC=Subject Consent

LI – this is the basic information that we have to keep about you in order to invite and welcome you to our activities.

Op – You can choose to give us this information if you wish, but you are not obliged to do so. Please tick the box in the SC column if you are happy for us to use your optional data.

		LI	Op	SC
Title:	Optional:	x	✓	
Given Name(s)		✓	x	x
Family Name		✓	x	x
Preferred Name	Optional:	x	✓	
Date First participated Last participated	You do not need to complete this box. We will keep our own records of this information.	✓	x	x
Address Street address Address line 2, if required Town/City Post/Zip Code		✓	x	x
Phone Number(s)	Optional:	x	✓	
E-mail Address(es)	Optional:	x	✓	
Subscriptions that you pay and any donations that you make	You do not need to complete this box. We will keep our own records of this information.	✓	x	x
Personal Experience, Expertise & Interests	Optional:	x	✓	

BRADFORD INCLUSIVE DISABILITY SERVICE

Special Needs	Optional:	x	✓	
---------------	-----------	---	---	--

I confirm that I am happy for the Charity to hold my above personal data and to use it for the purposes described in the Privacy Notice overleaf.

Signed: Date:/...../201.....



B.I.D.S
BRADFORD INCLUSIVE DISABILITY SERVICE

We are committed to reviewing our policies and good practices annually.

These policies were last reviewed on:

.....(date)

Signed:

.....

Est. 1975 Re-Est. 2020
Charity No. 503944

Date:

.....

These Policies will be reviewed before the:

B.I.D.S

BRADFORD INCLUSIVE DISABILITY SERVICE