



Data Protection Policy

1. Introduction

Treasure Chest is committed to protecting the personal data provided by individuals and recognises the importance of being clear about how the data will be used. All personal data provided will be held by Treasure Chest, which is the Data Controller.

This policy (sometimes called a privacy policy) relates to personal data provided to Treasure Chest in electronic and paper format by volunteers, service users and other interested parties. There are hyperlinks contained within Treasure Chest's website which link to other websites owned and operated by third parties. These third parties have their own privacy policies. Treasure Chest does not accept any liability or responsibility for the privacy and security practices of these third parties.

You may be reading this data protection policy because Treasure Chest has asked you for personal information. Not all the sections of this policy may apply to you. If you have any questions, please contact Treasure Chest at:

treasurechestyork@gmail.com

www.treasurechest.org.uk

2. Definitions

Personal data is information about a person which can be identified as being about them. It can be stored electronically or on paper and can include images and audio recordings as well as written information.

Data protection is about how Treasure Chest, as an organisation, ensures that the rights and privacy of individuals are protected, and the law complied with, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

A Data Controller is a person or organisation who controls the purpose of and means by which personal data is processed. A data controller is responsible for complying with data protection regulations and remains accountable even if a third party carries it out on their behalf.

3. Responsibility

Overall and final responsibility for data protection lies with Treasure Chest's Core Committee, who are responsible for overseeing activities and ensuring this policy is upheld.

All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

4. Policy statement

1. Treasure Chest needs to keep personal data about the following groups:
 - a. Volunteer applicants and referees
 - b. Volunteers
 - c. Contracted service providers
 - d. Service users
 - e. Research participants
 - f. Mailing list subscribers
 - g. Donors
2. In general, the purposes for keeping this data are:
 - a. to recruit volunteers;
 - b. to deliver services and activities effectively;
 - c. to inform interested parties about the organisation's activities;
 - d. to satisfy safeguarding requirements;
 - e. to carry out research.
3. Treasure Chest 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 (GDPR) and other relevant legislation.
4. Only the minimum amount of data needed for clear purposes will be collected, stored and used; we will not collect, store or use data we do not need.
5. There are a number of legal bases for processing personal data under the terms of the GDPR legislation. Treasure Chest relies on the following bases:
 - the individual has given clear **consent** to process their personal data for a specific purpose;
 - processing is necessary for Treasure Chest's **legitimate interests**; in other words, Treasure Chest needs to process personal data in order to run the organisation and deliver services;
 - the processing is necessary to comply with **legal obligations** (e.g. social protection law);
 - the processing is necessary for a **contract** between Treasure Chest and an individual.
6. When requested by the individual, Treasure Chest will provide details of the data held about them within 30 days and make no charge.
7. Data will be deleted, if requested by the relevant individual, unless we need to keep it for legal reasons (for example, for safeguarding records).
8. Treasure Chest will endeavour to keep personal data up-to-date and accurate.
9. Personal data will be stored securely.
10. Clear records will be kept showing the purposes for collecting and holding specific data to ensure it is only used for these purposes.
11. Personal data will not be shared with third parties without the explicit consent of the relevant individual, unless legally required to do so. Exceptions to this are Treasure Chest's use of third-party websites to protect and manage data and communications, which use and

store data in accordance with UK data protection regulations (e.g. Google, Dropbox, Eventbrite, Mailerlite, PayPal¹).

12. Treasure Chest will endeavour to avoid data breaches. However, in the event of a data breach attempts will be made to get back any lost or shared data and processes will be evaluated 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.
13. To uphold this policy, Treasure Chest will maintain a set of data protection procedures for the Core Committee and volunteers to follow.

5. Data protection procedures

The following procedures outline the ways in which Treasure Chest collects, stores, uses, amends, shares, destroys and deletes personal data. These procedures cover the main, regular ways we collect and use personal data. From time to time, data may be collected and used in ways not covered here; in such cases the principles contained in this Data Protection Policy will be followed.

- a. Data will be stored securely. Electronic data will be password protected on an encrypted drive. When stored online in a third-party website (e.g. Google Drive) we will ensure that the third party comply with the UK GDPR. Any personal data collected on paper will be transferred to secure electronic storage and then destroyed. In exceptional cases where paper copies need to be kept, they will be stored in a locked container, e.g. locked filing cabinet.
- b. When data is no longer needed, or the individual has asked for their data to be deleted, it will be deleted securely and permanently from computers. Data on paper will be shredded.
- c. Records of consent to collect, store and use data will be kept and stored securely.
- d. Only those who need access to personal data to perform a legitimate function of Treasure Chest will be given access.

6. Volunteer applicants and referees

Treasure Chest stores and uses personal data about prospective volunteer applicants (i.e. people who have shown an interest in applying to be a volunteer and asked to be added to a training waiting list), volunteer applicants (people who have completed an application to become a volunteer) and referees (people who have been asked to provide a reference for applicants). This information is processed for the following purposes:

- to inform prospective volunteer applicants about upcoming training opportunities;
- to gather information in order to assess applicants' eligibility and suitability to volunteer with Treasure Chest;
- to inform successful applicants about training schedules and other information about volunteering with Treasure Chest.

Treasure Chest holds the following personal data about prospective applicants:

- Full name
- Email address

¹ These companies have all published their own privacy policies confirming that their data processing meets EU standards.

The following personal data is held about applicants:

- Full name
- Postcode
- Email address
- Phone number
- Details of their breastfeeding experience
- Special needs and adjustments

Personal data is also held about referees:

- Full name
- Email address

When people who have registered their interest in training are contacted about training opportunities they will be asked if they would like to stay on the waiting list or to have their details removed.

When people apply to train as a volunteer with Treasure Chest, they will be given a privacy notice which explains why they have been asked for their information, what it is being used for, how long it will be kept, and that they can ask to have it deleted or amended at any time by contacting Treasure Chest.

The information of those who complete volunteer training is transferred to the volunteer database, after which the application forms (containing applicants' and referees' personal data) are electronically deleted.

7. Volunteers

Treasure Chest stores and uses personal data about current volunteers for the following purposes:

- to inform volunteers about Treasure Chest services, events, news, and training opportunities;
- to organise service delivery;
- to satisfy safeguarding requirements.

Treasure Chest holds the following personal data about current volunteers:

- Full name
- Email address
- Phone number
- Date of birth
- Disclosure and Barring Service certificate number and issue date
- Details of service – venues/activities, training completed, start and end date (where applicable)
- Bank account details (only where expenses claimed)

To allow volunteers to work together to organise service delivery, it is often necessary to share volunteer contact details with other volunteers, for example group emails or group chats on Whatsapp. Volunteers will be sent invitation links to join Whatsapp group chats.

Volunteers who act as members of the Core Committee or take on other posts need to be in contact with one another, and all volunteers, in order to run the organisation effectively and ensure its legal obligations are met. The email addresses of Core Committee members and other postholders will be shared to all volunteers. Core Committee members and

postholders will not share each other's contact details with anyone outside of Treasure Chest without explicit consent.

When volunteers step down from volunteering, or do not respond to contact for at least 12 months, most of their personal data will be deleted. However, a list of volunteer names, and dates and venues of service, will be maintained for 50 years after volunteers have stepped down from the organisation, to adhere to safeguarding requirements.

8. Contracted service providers

Treasure Chest sometimes enters contracts with individuals as providers of services. In such cases, Treasure Chest keeps personal data for the following purposes:

- to keep in contact about potential, current or past service delivery;
- to arrange payment for services received.

Treasure Chest holds the following personal data about contracted service providers:

- Full name
- Address
- Email address
- Phone number
- Bank account details

Personal financial information will be retained for six years, in accordance with charity law (see section 12) before deletion; contact information will be deleted two years after completion of the contract.

9. Service users

Service users can book some Treasure Chest events in advance, using Eventbrite (e.g. Zoom breastfeeding groups, workshops). In these cases, Treasure Chest stores and uses personal data about service users for the following purposes:

- to prepare and manage a list of attendees in the run-up to the event;
- to contact attendees with information both prior to and after the event, as necessary;
- (for attendees of workshops) to request feedback about Treasure Chest.

To book the antenatal workshop, service users provide the following personal information:

- Full name
- Email address
- Baby's due date
- Billing address (if they have chosen to give a donation)

To book for the Zoom group and postnatal workshops, service users provide the following personal information:

- Full name
- Email address
- (optional when booking the Zoom group) information about their breastfeeding experiences.

The personal data of service users attending the antenatal workshop will be deleted within six months of the date of the workshop. This will allow for attendees to be contacted three months after the workshop to request their feedback.

The personal data of service users attending the Zoom group or postnatal workshops will be deleted within six months of the date of the event.

In addition, there are occasions when service users are invited to leave contact details (name, email address) with Treasure Chest so that they can be contacted about taking part in a research study or informed about opportunities to train as a Treasure Chest volunteer. Personal data of prospective research participants will be deleted when the research study has been concluded. More information about the retention of prospective volunteers' data is in section 6 above.

10. Research participants

Treasure Chest undertakes a number of regular and ad hoc research activities. Treasure Chest stores and uses personal data about research participants for the following purposes:

- to contact participants in order to arrange data collection (e.g. research interview) or to inform them of the research outcomes;
- to develop understanding of families' experiences and views in order to inform service development and improvement.

Each research study is different in focus, but in general research participants are asked to provide the following personal information:

- Name (if taking part in an interview)
- Email address (if taking part in an interview)
- Postcode
- Age
- Ethnicity
- Highest level of education
- Occupation
- Details of their breastfeeding experience

Informed consent from each participant is obtained before research data is collected. Research data is stored securely and kept separate from personal information, so that research findings are anonymous. Research participants' personal data is deleted when research findings are published; anonymous research data is kept for 10 years after publication before being deleted.

11. Mailing list subscribers

Treasure Chest maintains a mailing list of people who have signed up to receive a regular newsletter. By providing their name and email address, people give consent to receive newsletters containing information about the work of Treasure Chest, details about financial giving and opportunities to take part in research.

When people sign up to the mailing list they are told 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. Every mailing provides information about how to be removed from the mailing list. Treasure Chest's current mailing list provider is Mailerlite. Information contained in the mailing list will only be used to send the regular newsletter.

12. Financial records

Treasure Chest keeps records of all income received and payments made. Income from individuals includes donations processed through PayPal, Eventbrite, People's Fundraising, Shop&Give and other fundraising platforms, as well as regular donations made directly to Treasure Chest. Payments include volunteers' expenses and payments to contractors.

The purposes for keeping this information are:

- to maintain a full record of the organisation's income and expenditure for audit reasons;

- to arrange payment/reimbursement for goods and services received.

For information about the personal information kept about contracted service providers, see section 8 above.

The following personal information is kept about individual donors within the payment platform used or via Treasure Chest's bank account :

- Full name
- Date of donation(s)
- Amount(s) given

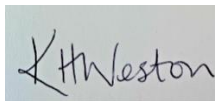
In addition, the bank account details of all individual payees are kept within Treasure Chest's banking facility.

Financial records will be retained for at least six years from the end of the financial year to which they relate (in accordance with the Charities Act 2011), or for as long as governed by agreements with funding bodies (if this is longer).

13. Review

This policy and the procedures outlined within will be reviewed every two years.

Signed (Core Committee member): _____



Name (printed): Kath Weston

Date: 29 November 2023

Next review due: November 2024