



# **Family Matters York Data Protection Policy**

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## 1. Introduction

The purpose of this policy is to ensure the privacy and security of any personal data that we may hold on any individual involved in the work of Family Matters York in any capacity, and that the storage and processing of any such information is in compliance with GDPR legislation.

Family Matters York works to strengthen relationships and building confidence in families through courses on a variety of subjects. To do this we need to process personal data about people who are attending a course with us; job applicants and employees; volunteers and trustees; customers and suppliers as well as our supporters and donors. Each of these categories has a specific data set. We are committed to ensuring the privacy of the personal data we hold about any individual. This Policy outlines what data we collect, how we may use it, how we protect that data, and the rights of the individual.

Through this policy Family Matters York will seek to safeguard the privacy of personal information by giving clear guidance about how personal information is kept, stored, processed and deleted. This policy therefore aims to eliminate the risk of personal data being lost or being kept in an insecure manner which may result in data breaches.

This policy applies to all staff, the Board of Trustees, volunteers and anyone else who may be working on behalf of Family Matters York.

## 2. Legal Framework

In the writing of this policy consideration has been given to recent changes in legislation, most notably the implementation of General Data Protection Regulations on 25 May 2018.

## 3. Definitions

- A *course attendee* is anyone who attend any number of parenting or relationship courses provided by Family Matters York.
- A *job applicant* is any individual who is seeking employment with Family Matters.
- An *employee* is any individual who has a contract of employment with Family Matters York.
- A *volunteer* is any individual who has signed a volunteer agreement in order to take an active part in the delivery of the charity's aims and objectives but without financial recompense.
- A *contractor* is any individual/organisation who is completing paid work on behalf of Family Matters York but who is not an employee.

- A *facilitator* is someone who has been trained and carries out the role of leading a parenting or relationship course for Family Matters York.
- A *supporter/donor* is any individual who contributes to the work of Family Matters York through good will, financial support, prayer, etc., but who has not signed a volunteer agreement to partake in the frontline delivery of the charity's aims and objectives.
- A *trustee* is any individual who is a member of the Board of Trustees.

## 4. Responsibilities

All members of staff, the Board of Trustees, volunteers and those working on behalf of Family Matters York have the responsibility to adhere to the guidelines stated in this policy.

This policy will be reviewed and amended on an annual basis in order to reflect changes in legislation and practice.

The Chair of Trustees has final responsibility for the content of this policy, regular reviews of the policy and the implementation of the guidance contained herein.

The Development Manager is responsible for adherence of this policy in matters relating to staff conduct and office management, as well as the training of volunteers, the consent of volunteers, donors and supporters.

All staff are responsible to read this policy and adhere to procedures in place.

## 5. Types of Data Collected

In the operation of its aims and objectives Family Matters York collects data in the following formats:

- Paper (written correspondence, memos, printed documents)
- Verbal
- Electronic forms and reports
- Communication via the internet, email, social media
- Photographs, videos

## 6. Why Family Matters York Collects Personal Data

Family Matters York collects personal data in order to fulfil its aims and objectives of working to strengthen relationships and building confidence in families through courses on a variety of subjects. The category group determines the range of data we hold on

that group of individuals, and the length of time which the data is stored for prior to deletion:

*Course attendees*

The personal details required to allow Family Matters York to set up and run courses. Data is held to enable the charity to contact attendees and potential attendees on courses. This information is stored through the duration of the course for use by the course leader in contacting to encourage attendance as well as to inform of any possible changes to the course. It is also held for emergency purposes. Information is held for a period following the course as it is required in some cases for evidence of individuals having attended a course.

*Job applicants and employees*

For job applicants and members of staff we need contact information, CVs, referees, financial details such as banking arrangements to pay salaries etc, emergency contact, health reports, DBS, etc. For employees of Family Matters York there is a contractual context that defines the relationship between the parties that authorises the data processing.

*Volunteers and Trustees*

For volunteers and trustees, we need contact information, CVs, referees, DBS etc.

*Partner Agencies*

There are several of Family Matters York's partners with whom we exchange sensitive data. This includes bodies such as the Payroll department at PCLG, HMRC and City of York Council where we are complying with a legal duty.

*Donors and Supporters*

Contact details to allow communication with donors and supporters regarding fundraising and campaigns together with our general newsletters. Gift Aid information for any donations that donors and supporters make to Family Matters York.

## **7. Permission to Process Personal Data**

In order to communicate with volunteers, supporters and donors Family Matters York operates a mailing list for both written and electronic communication. Inclusion on this mailing list is subject to Family Matters York receiving consent from the individual. Volunteers, supporters and donors are provided with regular opportunities to opt out/unsubscribe from the mailing list and have their personal data deleted. As part of the deletion schedule volunteers will be removed from the mailing list two years after their last involvement with the charity.

## **8. Withdrawing Permission to Process Personal Data**

If any individual wishes to change their consent, update their personal details, or unsubscribe from our communications at any point, they can do this by contacting the Family Matters York Development Manager by letter, email or phone call at the addresses shown at the end of this policy.

Electrical communication from Family Matters York will have a link to unsubscribe from mailing lists so that individuals are able to manage their own consent.

## **9. Training for Staff and Volunteers**

As part of the induction process for new staff and volunteers, training will be given on data protection and confidentiality policies regarding the personal data of course attendees and volunteers, office management and electronic devices. This training will be regular and continuous.

## **10. Disclosure of Personal Data**

We will not, without the individual's consent, supply any personal data to any third party. The only exception to this will be when the transfer is to a secure data processor which carries out data processing operations on our behalf, or when we are required to do so by law enforcement or regulatory bodies where this is allowed under the relevant legislation.

We will never share or sell personal data to a third party for marketing, fundraising or campaigning purposes.

## **11. Storage and Security of Personal Data**

It is essential that Family Matters York stores and processes personal data in order to achieve its goal of working to strengthen relationships and building confidence in families through courses on a variety of subjects. The retention of data enables Family Matters York to provide appropriate and accurate advice or support to its service users. Family Matters York uses technical and organisational precautions to prevent the loss, misuse or alteration of personal data.

We may use personal data for statistical reports when providing analyses to funding bodies or reviewing the effectiveness of the service. These statistics will not include any information that could be used to identify any individual.

Family Matters York will not pass on any personal data to third parties without an agreement in writing from the individual concerned.

For employees of Family Matters York there is a contractual context that defines the relationship between the parties that authorises the data processing.

Information that is held regarding job applicants, volunteers, trustees, contractors and supporters/donors is not as sensitive as information regarding course attendees, but the same general approach is employed in the storing and processing of data. Personal data is stored securely online and paper records are stored in a locked filing cabinet.

Volunteers, supporters and donors have given their individual consent for us to contact them by hard copy and electronic mediums to:

- Notify them of our charitable purpose, campaigns and fundraising.
- Circulate marketing information.
- Circulate questionnaires.
- Inform them about services and the volunteer opportunities provided by Family Matters York.

### ***11.1 Office Management***

Family Matters York provides its staff with clear policies and procedures about the protection of personal data in the office environment:

- There is a clear desk policy in operation. Should members of staff be out of the office during the working day their work should be put away, files returned to the filing cabinet, and no personal data left on their desks.
- At the end of each day the filing cabinets are locked and the keys placed in the key safe.
- At the end of the working day diaries should be locked in desk drawers/filing cabinets.
- Meetings with visitors should be conducted in the designated meeting room rather than in the office.
- All paperwork which includes personal data is subject to a retention and deletion schedule which is included in this policy.
- Confidential waste is always shredded and never placed in general waste.

### ***11.2 IT Systems and Electronic Devices***

- Each member of staff at Family Matters York has been provided with a laptop to use for work purposes. These laptops have access to the internet, email, and other documents on the shared drive (OneDrive). Each laptop is password protected. Staff should not disclose their password to third parties.
- All confidential work is saved on the shared drive and not in unsecured locations.
- Confidential documents which are sent to partner agencies are sent via secure email.
- Access to the shared drive is through double level authentication.
- Staff must not store work related telephone numbers or information on their personal phones.
- Staff must not use their personal email addresses for work purposes.
- Staff must log off the shared drive and turn off their computers at the end of the working day.

### **11.3 Working from Home**

- Throughout the charity members of staff will work in satellite offices, from home using a laptop, tablet or desktop computer. This should be done through the shared drive.
- Documents must not be downloaded and saved onto personal computers and devices.
- At the end of the session members of staff must log out of office.com.
- Access to the shared drive is through Office 365 and is password protected with double level authentication.

## **12. Retention and Deletion of Personal Data**

Family Matters York only stores personal data for a specific period of time. The category of the individual (member of staff, volunteer, etc.) determines a) the type of data which is stored and b) the length of time it is stored for. Once the prescribed retention period has expired the information will be confidentially disposed of and permanently deleted.

### **12.1 Retention and Deletion Schedule**



<b>Category</b>	<b>What information is stored?</b>	<b>When is this data deleted?</b>
Member of staff	For job applicants and members of staff we need contact information, CVs, referees, financial details such as banking arrangements to pay salaries etc, emergency contact, health reports, DBS, etc. For employees of Family Matters York there is a contractual context that defines the relationship between the parties that authorises the data processing.	Six years following cessation of employment
Job Applicant	For job applicants and members of staff we need contact information, CVs, referees, financial details such as banking arrangements to pay salaries etc, emergency contact, health reports, DBS, etc. For employees of Family Matters York there is a contractual context that defines the relationship between the parties that authorises the data processing.	One year following job application being made.
Volunteer/trustee	Contact details, DBS.	Two years following the last significant involvement with Family Matters York. Volunteers are given regular opportunity to unsubscribe from mailing lists and have their personal data deleted.
Supporter/Donor	Contact details, financial details.	Consent given to process data. Supporters and donors are given regular opportunities to unsubscribe from mailing lists and have their personal data deleted.
Contractor	Contact details, financial details.	Three years since last involvement with Family Matters York.
Partner agency	Contact details, financial details.	

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### **I3.Access Rights**

Under data protection regulations and legislation there is a right for individuals to know what personal information is being stored, and for them to ask permission to see such information.

Family Matters York will supply any information that we hold about an individual within a 28-day period of receiving such a request, free of charge. Individuals requesting release of their data will be required to provide proof of their identity.

Data subject access requests can be made in writing via the contact details shown in Section I4.

### **I4. Further Information**

#### **Family Matters York Contact Details**

Postal address of registered office (Mark envelope 'Private and Confidential').

Family Matters York  
65 Lawrence Street  
YORK  
YO10 3BU

Email  
info@fmy.org.uk

Telephone  
01904 421 880

### **I5. Policy Review**

This policy will be reviewed annually by the Chair of Trustees and recommendations made to the Board of Trustees as required.

This should include (but not be limited to):

- to reflect changes in the law,
- changes in guidelines from supporting or advisory bodies/organisations, and
- effectiveness of the policy

### **I6. Revision History**

<b>Policy Version</b>	<b>Date Active</b>	<b>Overview of Changes</b>
1.0	2 May 2018	First version
1.1	20 November 2019	Revision