

Data Protection Policy

1.0 Policy

At Camberley Care Trust (CCT) we are committed to:

- Ensuring that we comply with the seven data protection principles, as listed below
- Meeting our legal obligations as laid down by the EU's General Data Protection Regulation (GDPR)
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only to meet our operational needs or fulfil legal requirements
- Taking steps to ensure that personal data is relevant, up-to-date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated CCT officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensuring that all CCT officers are made aware of good practice in data protection
- Providing adequate training for all CCT officers responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Maintaining records as evidence of compliance
- Ensuring that queries about data protection, internal and external to the CCT, are dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the CCT

2.0 Seven Data Protection Principles from GDPR

1. Personal data shall be processed fairly, lawfully and transparently
2. Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
4. Personal data shall be accurate and, where necessary, kept up-to-date
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
6. Personal data shall be processed in a manner ensuring appropriate security of the personal data including protection against unlawful processing or accidental loss, destruction or damage
7. Accountability: To have appropriate measures and records in place as proof of compliance with the data processing principles.

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3.0 How do we ensure we abide by the Policy

Below are the procedures in place to demonstrate how we adhere to the Policy

- Ensuring that data is collected and used fairly and lawfully
 - The Charity Portal System (CPS) is set up to only collect data that is necessary to fulfil the client's requests for car trips or handyman jobs and confirm Gift Aid status.
 - No other data is collected.
- Taking steps to ensure that personal data is relevant, up-to-date and accurate
 - Staff using the Charity Portal System ensure the personal data we hold is accurate and relevant whenever they are in contact with the client.
- Establishing appropriate retention periods for personal data
 - Client data is retained whilst the client is active with CCT. When the client has not used our services for 12 months and we have processed the end-of-year Gift Aid accounts, we deem the client to be inactive and data is removed from the Charity Portal System.
- Ensuring that data subjects' rights can be appropriately exercised
 - This is about the client's right to view all data that we hold about them, and the right to have it amended or deleted; all such requests are to be forwarded to the Trustee responsible for Data Protection compliance, who will see to it that any such requests are dealt with.
- Providing adequate security measures to protect personal data
 - The Charity Portal System (CPS) holds client information which is considered sensitive.
 - CPS has had a security review (in 2022/3).
- Access to the CPS is only allowed
 - from the computers used by designated staff and volunteers
 - via a secure encrypted VPN tunnel
- Access to the CPS system from elsewhere is prevented by a firewall.
 - Users accessing the CPS via VPN also need to login in the usual way.
 - The CPS database is backed up every night to a different storage medium.
 - This data is kept in a very secure data centre.
- Ensuring that a nominated CCT officer is responsible for data protection compliance and provides a point of contact for all data protection issues
 - Mr Tim FitzGerald is the nominated Trustee responsible for Data Protection compliance and the central point of contact for all related issues.

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- Ensuring that all CCT officers are made aware of good practice in data protection
 - Guidance on good practice in data protection has been issued to all Trustees and this guidance is also available in the Policies folder on the shared Dropbox space.
- Providing adequate training for all CCT officers responsible for personal data
 - with documented training objectives
- Ensuring that everyone handling personal data knows where to find further guidance
 - The guidance and training material referred to above includes links to further guidance and
 - Identifies the Trustee responsible for Data Protection
- Maintaining records as evidence of compliance
 - The Trustee responsible for Data Protection maintains a record of data protection guidance
 - and training given to office staff, duty managers and trustees.
- Ensuring that queries about data protection, internal and external to CCT, are dealt with effectively and promptly
 - The Trustee responsible for Data Protection is the first point of contact and is authorised to engage directly with anyone within CCT to respond to the query.
- Regularly reviewing data protection procedures and guidelines within CCT
 - The Trustee responsible for Data Protection will review the procedures and guidelines every year and keep a record of it.

4.0 Links to Supporting Documents

- Data Protection Officer – Role Description
 - Guidance for responding to Subject Access Requests
- These can be found in the CCT Dropbox Policies folder

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	Name	Job Title & Department
Created by	Tim FitzGerald	Trustee
Consulted for Comments		Board of Trustees
Approved by	Board of Trustees	
Approval Date	February 2025	

Version/Review No	Review Date	Individual Responsible for Policy Review	Individuals Responsible for Audit of Policy	Summary of Changes
Version 1	February 2027	Tim FitzGerald, Trustee	Board of Trustees	