



# Windsor Christian Action

Supporting Vulnerable People in the Windsor Community

## Data Protection Policy

### Key details

- Policy prepared by: Niall McCarthy
- Approved by: Mike McEvoy
- Policy became operational on: 25 05 2018
- Updated On: 23 04 2020  
by Mike McEvoy (WCA) & John Sismey (MTaS)
- Reviewed by: Jane Deakin 26th January 2022

### Introduction

Windsor Christian Action needs to gather and use certain information about individuals. Note throughout this document reference to Windsor Christian Action includes its Projects (Windsor Foodshare, Windsor Street Angels, Windsor Safety Hub & More Than a Shelter)

These can include guests, suppliers, business contacts, associates, employees, volunteers and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet our data protection standards — and to comply with the law.

### Why this policy exists

This data protection policy ensures Windsor Christian Action:

- Complies with data protection law, including the General Data Protection Regulation (GDPR) from 25<sup>th</sup> May 2018 and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

### Data Protection Law

The General Data Protection Regulation (EU Law from 25<sup>th</sup> May 2018), describes how organisations, including Windsor Christian Action must collect, handle, store and, where applicable share personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

## **People, Risks and Responsibilities**

### **Policy Scope**

This policy applies to:

- Staff and associates of Windsor Christian Action
- All contractors, suppliers, volunteers and other people working on behalf of Windsor Christian Action

It applies to all data that the charity holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulation. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Personal data of guests, including potentially medical and/or criminal convictions
- ...plus any other information relating to individuals

### **Data Protection Risks**

This policy helps to protect Windsor Christian Action from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the charity uses data relating to them.
- **Reputational damage.** For instance, the charity could suffer if hackers successfully gained access to Special Category Data (previously sensitive data).

### **Responsibilities**

#### **Who is the Data Controller?**

The Controller for the purposes of the GDPR is:

The Trustees of Windsor Christian Action, Windsor Baptist Church, 71 Victoria Street, Windsor, SL4 1EH:

Website: [www.windsorchristianaction.org](http://www.windsorchristianaction.org)

The Trustees are ultimately responsible for ensuring that Windsor Christian Action meets its legal obligations.

### **Security**

Physical, electronic, administrative and managerial procedures have been introduced to safeguard and secure the information we collect from you to protect your Personal Data against accidental, unlawful or unauthorised disclosure.

If you have any concerns about providing any data electronically, you can provide it by post. We have implemented appropriate technical and organizational security measures designed to ensure that your personal data remains private and secure.

Everyone who works for or with Windsor Christian Action has responsibility for ensuring data is collected, stored and handled appropriately.

Each team member that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles, however, the **Trustees of Windsor Christian Action** are responsible for:

- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other staff to ensure any marketing initiatives abide by data protection principles.
- Keeping themselves updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed Schedule.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data Windsor Christian Action holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the charity's Special Category Data (previously known as sensitive data).
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluating any third-party services, the charity is considering using to store or process data. For instance, cloud computing services.
- Ensuring laptops and desktop computers have suitable passwords and are set to automatically switch into safe mode after a maximum of 20 minutes left idle

## General Staff Guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from the treasurer of WCA.
- Windsor Christian Action **will provide training** to any employees and volunteers to help them understand their responsibilities when handling data.
- Employees and volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used**, and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the charity or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and securely disposed of.
- Employees and volunteers **should request help** from the treasurer of WCA or (if appointed) the data protection officer if they are unsure about any aspect of data protection.

## Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the treasurer of WCA.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept electronically or **in a locked drawer or filing cabinet**.
- Employees and volunteers should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD, memory stick or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers** and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the charity's standard backup procedures.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## Data Use

Personal data is of no value to Windsor Christian Action unless the charity can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees and volunteers should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. It should never be sent by insecure email, as this form of communication is not secure.
- Data must be **password protected before being transferred electronically**.
- Personal data must **not be transferred outside of the European Economic Area** without permission and unless the receiving body has demonstrated adequate safeguards.
- Employees and volunteers **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

## Data Accuracy

The law requires Windsor Christian Action to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Windsor Christian Action should put into ensuring its accuracy.

It is the responsibility of all employees and volunteers who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff and volunteers should not create any unnecessary additional data sets.
- Staff and volunteers should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- Windsor Christian Action will make it **easy for data subjects to update the information** Windsor Christian Action holds about them. For instance, via the website.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the Controller's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

## Subject Access Requests

All individuals who are the subject of personal data held by Windsor Christian Action are entitled to:

- Ask **what information** the charity holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the charity is **meeting its data protection obligations**.

If an individual contacts the charity requesting this information, this is called a subject access request.

Subject access requests from individuals will normally be made by e-mail, addressed to the data controller at [windsorchristianaction@gmail.com](mailto:windsorchristianaction@gmail.com). The data controller can supply a standard request form, although individuals do not have to use this.

The data controller must under GDPR, supply the information within a maximum of one month.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

## Disclosing Data for Other Reasons

In certain circumstances, the General Data Protection Regulation allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Windsor Christian Action will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the trustees and legal advisers where necessary.

## Providing Information

Windsor Christian Action aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being collected, stored used and shared
- How to exercise their rights

To these ends, the charity has a privacy policy which explains how Windsor Christian Action collects, stores, uses and shares Personal Data. It also gives the rights under the GDPR law, including the rights for access to what data we hold. This privacy policy is available on request, is on our website and will be issued when we request consent to hold their personal data.

Signed by: .....M.N.McEvoy.....

(Secretary to Trustees)

Date: .....18th March 2020.....

Approved by Trustees: October 2020

Reviewed by Jane Deakin 26th January 2022

**Windsor Christian Action**  
Windsor Baptist Church Windsor, Berkshire SL4 1EH  
[www.windsorchristianaction.org](http://www.windsorchristianaction.org)  
Charitable Incorporated Organisation No: 1154308

Windsor Christian Action is the umbrella charity for the following: Windsor Homeless Project, Windsor Street Angels, Windsor Foodshare and More than a Shelter.