

Data Protection Confidentiality and Security Policy

Date adopted	September 2026
Review Cycle	Annual
Next Review	September 2027

Responsible persons:

Data Controllers: Joanna Read, Executive Director,
All Trustees are named as Data Controllers

1. Introduction

- 1.1. Bow Foodbank is committed to maintaining the data security of its Guests, Volunteers and Staff. We recognise that many of our Guests trust us due to our ability to protect their data, only sharing with other organisations information about our guests when they have asked us to do so. It is therefore of vital importance we do everything reasonably possible to protect their data.
- 1.2. The aim of this policy is to ensure that the collection and processing of personal information is appropriate and in accordance with the UK General Data Protection Regulation 2021 (UK GDPR) and the Data Protection Act 2018, in order to meet our legal responsibilities and in order to maintain and respect the trust and confidence of those with whom we interact.
- 1.3. The UK - GDPR (2021) requires that data processing complies with the following principles of data protection:
 - 1. Lawful, fair and transparent**
Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used.
 - 2. Limited for its purpose**
Data can only be collected for a specific purpose.
 - 3. Data minimisation**
Any data collected must be necessary and not excessive for its purpose.
 - 4. Accurate**
The data we hold must be accurate and kept up to date.
 - 5. Retention**
We cannot store data longer than necessary.
 - 6. Integrity and confidentiality**
- 1.4. The policy does not form part of the formal contract of employment, but it is a condition of employment that employees will abide by this policy. A breach of this policy may be considered gross misconduct.
- 1.5. The data we hold must be kept safe and secure.

2. General Principles

- 2.1. Bow Foodbank recognises that colleagues (employees, volunteers, trustees, sessional workers) gain information about individuals and organisations during the course of their

work or activities. In most cases such information will not be stated as confidential and colleagues may have to exercise common sense and discretion in identifying whether information is expected to be confidential. This policy aims to give guidance but if there is any doubt, colleagues should seek advice from line managers, or the board of trustees.

- 2.2. Colleagues are able to share information with their line manager in order to discuss issues and seek advice.
- 2.3. Colleagues will not disclose to anyone, other than their line manager, information that is considered sensitive, personal, financial or confidential without the consent of the individual concerned or the agreement of the Executive Director.
- 2.4. Colleagues will avoid talking with each other about personal and confidential matters relating to guests within settings where they could be overheard by others who should not be privy to this information.

3. Why information is held and the Rights on individuals

- 3.1. Bow Foodbank collects, stores, and processes personal information to carry out its legitimate activities, deliver services, comply with legal and regulatory requirements, protect individuals' welfare, manage employees and volunteers, administer finances, and support the effective operation of the organisation.
- 3.2. Bow Foodbank is committed to ensuring that personal information is accurate, kept up to date, relevant, and retained only for as long as necessary. Appropriate technical and organisational measures will be implemented to protect personal information against unauthorised access, disclosure, loss, misuse, alteration, or destruction.
- 3.3. Under UK GDPR, individuals have a number of rights regarding their personal information. These rights include:
 - **The Right to be Informed** – Individuals have the right to receive clear information about how their personal data is collected, used, stored, and shared.
 - **The Right of Access** – Individuals can request a copy of the personal information the organisation holds about them through a Subject Access Request (SAR).
 - **The Right to Rectification** – Individuals can request that inaccurate or incomplete personal information is corrected.
 - **The Right to Erasure** – In certain circumstances, individuals may request that their personal information is deleted.
 - **The Right to Restrict Processing** – Individuals may request that the use of their personal information is limited in specific circumstances.
 - **The Right to Data Portability** – Where applicable, individuals may request that their personal information is provided in a structured, commonly used, and machine-readable format.
 - **The Right to Object** – Individuals may object to the processing of their personal information in certain circumstances.
 - **Rights Related to Automated Decision-Making and Profiling** – Individuals have safeguards where decisions are made solely by automated means and significantly affect them.
- 3.4. If you have questions about exercising these rights or need assistance, please contact us at info@bowfoodbank.org

4. Personal Data Access Requests

- 4.1. Individuals are entitled to access personal data held about them. Bow Foodbank have a duty to comply with subject access requests except where doing so comes under a reasonable exemption, as outlined in the GDPR, for example where disclosure of information held would be likely to cause harm to others. If unsure, Bow Foodbank should seek legal or other advice about whether to comply with the request.
- 4.2. The request for these records must be in writing to the Bow Foodbank Administrator using Bow Foodbank's 'Personal Data Access Request form' (Appendix 1) and must be signed by the individual. You can also access the form in this link.
- 4.3. Bow Foodbank will verify the identity of the individual by reasonable means before providing the information.
- 4.4. Information will be provided within **one month** unless there is a good reason for delay (for example the request is complex or numerous) in which case the reason for the delay will be explained in writing to the data subject making the request why the delay is necessary.
- 4.5. We will provide a copy of the information free of charge. However, after the first request for data is made, any further requests for data made within the same year will be subject to a charge of £10 for each request made, in order to cover administrative costs. We may also charge a reasonable fee if further copies of the same information are required.
- 4.6. Sensitive personal information will only be made available to the person or organisation named on the file.
- 4.7. If we refuse to respond to a request, we will write to the individual within **one month** explaining why and informing them of their right to complain to the supervisory authority and to a judicial remedy.
- 4.8. If the request is made electronically, we will provide the information in a commonly used electronic format.

5. Consent

- 5.1. Where consent is the applicable lawful basis to the collection and processing of individual's personal information, Bow Foodbank will make sure that individuals are able to provide informed consent. Informed consent is when an individual:
 - a) Understands why their information is needed
 - b) Understands when and with who it may be shared with
 - c) Understands the possible consequences of agreeing or refusing to the proposed use of their data
 - d) Has options to consent to different types or purposes of processing
 - e) Is, as far as reasonably practical, competent enough to give consent and has given consent freely without duress.
- 5.2. Bow Foodbank will keep a record of when and how we obtained consent from the individual.
- 5.3. If an individual wishes to withdraw their consent to processing they should contact the administrator. Information about how to withdraw consent is publicly available on our website.
- 5.4. Bow Foodbank will act on withdrawals of consent as soon as possible or within one month.

6. Sensitive Personal Content

- 6.1. Bow Foodbank will obtain **express consent** from the data subject to collect and process special category data unless there is rightful and legal reasons to have this information for employment or child protection etc.
- 6.2. **Sensitive Personal data** means personal data relating to the:
- a) Racial or ethnic origin of the data subject,
 - b) their political opinions,
 - c) their religious beliefs or other beliefs of a similar nature,
 - d) whether they are a member of a trade union
 - e) their physical or mental health or condition,
 - f) their sexual life,
 - g) their genetic or biometric information
 - h) the commission or alleged commission by them of any offence, or
 - i) any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.
- 6.3. Where consent is the legal basis for holding data about an individual, Bow Foodbank has duty to obtain explicit consent to process sensitive personal data
- 6.4. Agreement to Bow Foodbank's processing some specified personal data is of a condition of employment for staff and involvement for volunteers. This may include providing information about previous criminal convictions or undergoing a DBS check in order to meet our duty of care to other staff, and service users particularly children. A refusal to provide such information or undergo a DBS check when requested may result in the offer of employment/volunteering being withdrawn.
- 6.5. Information about medical conditions, disabilities or allergies is collected for in order for us to protect the health and safety of the individual. We will obtain consent from the individual before processing wherever possible, however in certain circumstances we would share this information on the basis of protecting the vital interests of the individual, for example in the case of a life-threatening medical emergency.
- 6.6. Information about ethnicity, religion, gender, disability of service-users is collected for the purposes of monitoring in order to ensure the effectiveness of our equal opportunities policy. It may also be reported to funders for their monitoring purposes.
- 6.7. Bow Foodbank may collect and process sensitive personal data such as mental or physical health conditions, sexual life or details of criminal offences, in order to be able to provide personalised support to the individual as part of our referral service. We will obtain consent from the data subject through the Consent Form (Appendix 2). This information will only be viewable by the Executive director and Triage Teams.

7. DBS Disclosures

- 7.1. Bow Foodbank complies fully with the DBS Code of practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
- 7.2. Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a **criminal offence** to pass this information to anyone who is not entitled to receive it.
- 7.3. DBS certificates will not be kept. However, Bow Foodbank may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position

for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

8. Third-Party Service Providers and Data Processors

- 8.1. To support the delivery of our services, we use trusted third-party providers who process personal data on our behalf. These providers act as Data Processors and are contractually required to process personal information only in accordance with our instructions and applicable data protection legislation.
- 8.2. Bow Foodbank has a responsibility to only appoint processors who provide sufficient guarantees that they can meet the requirements of UK GDPR and the Data Protection Act 2018 in order to protect the rights of data subjects.
- 8.3. All staff, trustees and volunteers who process data as part of their duties have signed written contracts outlining their responsibilities regarding data protection and confidentiality.
- 8.4. Plinth
 - 8.4.1. We use Plinth to manage aspects of our service delivery, including the collection, storage and administration of personal information relating to our guests.
 - 8.4.2. Plinth use Google's Firestore database, hosted within the EU (at europe-west3). [Access Plinth's Privacy Policy here.](#)
- 8.5. Volunteerero
 - 8.5.1. We use Volunteerero to manage volunteer recruitment, communications, scheduling, training, and volunteer records.
 - 8.5.2. Volunteerero acts as our data processor and processes personal information only for the purposes of providing services to our organisation
 - 8.5.3. Volunteerero operate on Amazon Web Services servers based in Ireland. [Access Volunteerero's Privacy Policy here.](#)
- 8.6. Mailchimp
 - 8.6.1. We use Mailchimp to communicate with volunteers about weekly updates, volunteering opportunities, and scheduling.
 - 8.6.2. We use Mailchimp to communicate with donors and keep them informed about Bow Foodbank's activities.
 - 8.6.3. Mailchimp's owned and operated servers are located in world class data centers in the United States. [Access Mailchimp's Privacy Policy here.](#)

9. Data Security

- 9.1. Bow Foodbank has appropriate data processing agreements in place with our service providers where required by UK GDPR. These agreements require our processors to:
 - a) Process personal data only on our documented instructions;
 - b) Maintain confidentiality;
 - c) Implement appropriate security measures;
 - d) Assist us in fulfilling individuals' rights requests;
 - e) Report personal data breaches where required;
 - f) Delete or return personal data when services end, where applicable.
- 9.2. Information is confidential to Bow Foodbank as an organisation and may be passed to colleagues, line managers or trustees to ensure the best quality service for users.
- 9.3. Where information is sensitive, i.e. it involves disputes or legal issues, it will be confidential to the employee dealing with the case and their line manager. Such information should be clearly labelled 'Confidential' and should state the names of the

colleagues entitled to access the information and the name of the individual or group who may request access to the information.

- 9.4. Colleagues will not withhold information from their line manager unless it is purely personal.
- 9.5. All staff and volunteers are responsible for ensuring that:
 - a) Any personal data which they hold is kept securely
 - b) Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party
- 9.6. Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action. Unauthorised disclosure may be considered as gross misconduct.
- 9.7. General non-confidential information about organisations is kept in unlocked filing cabinets and in computer files with open access to Bow Foodbank colleagues.
- 9.8. Personal Information and records relating to service users will be stored securely. In the case of paper records, records will be stored in lockable filing cabinets. In the case of records held on a data cloud or database, these will be password protected. These records will only be accessible to authorised staff or volunteers. Records will be accessible to the appropriate people.
- 9.9. Files or filing cabinet drawers bearing confidential information should be labelled 'confidential'.
- 9.10. When viewing sensitive information staff should make every effort to ensure that it is not accessible to others who are not authorised to access this information. Care should be taken not to leave documents in photocopies, open on computer screens when unattended.
- 9.11. Staff and volunteer must take care to log out Plinth, and Volunteer databases at the end of their session, lock their computer when away from their desk, lock away confidential files after use, and to safeguard and regularly update their passwords for the database and file access in order to prevent unauthorised access.
- 9.12. If sensitive personal data is emailed or otherwise shared electronically, this data must be encrypted and password protected.

10. Disposing of Information

- 10.1. Guest information will be stored for six years. After this it will be disposed of appropriately, unless specific legal, safeguarding, employment, contractual, or governance requirements dictate otherwise.
- 10.2. A list is attached of the retention guidelines used by Bow Foodbank for all types of information that we store (Appendix 5).
- 10.3. Care will be taken to ensure that the documents containing personal information are shredded before being consigned to the waste collection.
- 10.4. Bow Foodbank will ensure that all personal and organisational data is non-recoverable from any computer system previously used within the organisation and which has been passed on/sold to a third party.

11. Sharing Information

- 11.1. Bow Foodbank may share data with other agencies such as the local authority, funding bodies and other voluntary or statutory agencies. Consent will be sought and obtained from the individual before personal information is shared in most circumstances.
- 11.2. Personal data provided to funders and donors will usually be anonymised.

11.3. Bow Foodbank has a legal duty to disclose some information (including sensitive data) in the following situations:

- a) Suspected abuse of children or vulnerable adults will be reported to the relevant Social Services Department. Affected children, adults at risk and their parents or legal guardians will be informed of the disclosure except where to do so would put children or others at further risk.
- b) Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.

11.4. Colleagues believing an illegal act has taken place, or that a person is at risk of harming themselves or others, must report this to the Rector, church wardens or Safeguarding officer who will report it to the appropriate authorities.

11.5. If sensitive personal data is to be shared with partner organisations for example, for the purposes of better service provision or safeguarding, the following steps should be taken by Bow Foodbank staff members:

- a) Confirm the identity of the person you are sharing with
- b) Obtain consent to share if safe, appropriate and feasible, from the subject of the data
- c) Confirm the reason the information is required
- d) Be fully satisfied that it is necessary to share
- e) Check with a manager/specialist or seek legal advice if you are unsure
- f) Don't share more information than is necessary
- g) Inform the recipient if any of the information is potentially unreliable
- h) Ensure that the information is shared safely and securely
- i) Be clear with the recipient how the information will be used
- j) Record what information is shared.
- k) Only use the information for the purpose it was disclosed, provided it is within limits of confidentiality

12. Data breaches

- 12.1. A personal data breach is as a security incident that affects the confidentiality, integrity or availability of personal data. For example when personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.
- 12.2. If a data breach occurs, Bow Foodbank Staff will approach the Executive Director first for advice. We will then inform affected individuals without delay and if necessary report the breach to the ICO. We will provide information about what information has been breached and the nature of the breach and give advice about how they can protect themselves. See Data Breach Procedure (Appendix 6).
- 12.3. We will document all data breaches internally, noting the category and number of individuals concerned, likely consequences of the breach and description of measures taken to deal with the breach. We will use this to adjust our policies and procedures in order to better protect individuals data. We are required to provide this documentation to the ICO, if our decision not report a breach is challenged.
- 12.4. As part of updating its data audit Bow Foodbank has carried out data protection impact assessments (DPIAs) in order to help us identify actions that ensure we comply with data protection law and protect individuals' privacy. This will be updated annually or sooner if required.

13. Responsibilities

13.1 The Data Controller is The Executive Director (Joanna Read) and all the Trustees of Bow Foodbank.

13.2 The Trustees are responsible for:

- Approving the policy
- Reviewing the policy at least every three years
- Ensuring that information security is properly managed.

13.3 The Executive Director is responsible for the development and upkeep of this policy. All changes should be made known to the trustees for verification and approval. They are responsible jointly for:

- Ensuring this policy is supported by appropriate documentation
- Ensuring that documentation is relevant and up-to-date and is compliant with any changes or amendments made to data protection legislation in the UK.
- Ensuring the policy and subsequent updates are communicated to relevant parties
- Ensuring that everyone processing personal information is appropriately trained to do so

13.3 All employees and those working with Bow Foodbank are responsible for

- Adhering to this policy
- Reporting any security breach or incident to management.

13.4 Guest and Volunteers must ensure that the personal data (including that of dependent children) they provide to Bow Foodbank is accurate and up-to-date. Guest and Volunteers users are responsible for notifying Bow Foodbank of any updates to their address, contact information, medical conditions or allergies or other relevant information.

14. Training

14.1. All staff will have undertaken GDPR training. It is also an expectation that Volunteers whose roles require them to handle personal data will have undergone the same GDPR training. This will be renewed every 3 years.

15. Conclusion

Compliance with the GDPR is the responsibility of all members of Bow Foodbank. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or access to Bow Foodbank's services or facilities being withdrawn, or even prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Executive Director.

16. APPENDICES

Appendix 1 – Personal Access Request Form

Appendix 2 – Guest Consent Form

Appendix 3 – Privacy Notice for Guests

Appendix 4 – Privacy Notice for Volunteers

Appendix 5 – Retention Guidelines

Appendix 6 – Data Breach Procedure

APPENDIX 1

PERSONAL DATA ACCESS REQUEST

Use this form to request access to personal data held by the Bow Foodbank LTD. Completion of this form helps us locate your information and verify your identity where necessary. Requests may also be made verbally or in writing.

SECTION 1 – REQUESTER DETAILS
Full Name:
Date of Birth:
Address:
Email:
Phone:
SECTION 2 – ACTING ON BEHALF OF ANOTHER INDIVIDUAL
Are you making this request on behalf of another person? YES / NO
If Yes, provide thier details and evidence of authority (e.g. consent or legal authority).
Name:
Relationship:
SECTION 3 – INFORMATION REQUESTED
Please describe the personal data you are requesting. Be as specific as possible to help us identify the information.
Please note the relevant dates, departments, services, account numbers, employee numbers, reference numbers, or other identifiers:
SECTION 4 – IDENTITY VERIFICATION
To protect personal data, we may need to verify your identity. Please indicate the identification documents or information supplied (if requested).

SECTION 5 – PREFERRED RESPONSE FORMAT

Please indicate how you would like to receive the response:

- ☐ Secure Email
☐ Post
☐ Collection by Arrangement
☐ Other _____

SECTION 6 - DECLARATION

I confirm that the information provided in this form is accurate and that I am the individual to whom the personal data relates, or I am authorised to act on that individual's behalf.

Signature: _____

Full name: _____

Date: _____

If filling this out electronically, please send the completed form to info@bowfoodbank.org. Otherwise, please submit this form to one of the foodbank staff in person.

PRIVACY NOTICE

We will use the information provided in this form solely for the purpose of processing and responding to your personal data access request and verifying identity where appropriate. We may contact you for clarification if required. We will retain request records in accordance with our retention policy and applicable data protection laws.

We will provide a copy of the information free of charge. However after the first request for data is made, any further requests for data made within the same year will be subject to a charge of £10 for each request made, in order to cover administrative costs. We may also charge a reasonable fee if further copies of the same information are required.

It may take up to one month from receipt of this form before a reply to the request is provided. This time limit may be extended by a further two months where necessary, taking into account the complexity and number of my requests for my personal data.

FOR OFFICE USE ONLY

Request Reference: _____

Date Received: _____

Identity Verified: YES / NO

Completed by: _____

APPENDIX 2
Bow Foodbank
Consent Form

Data Protection

In order to help you, Bow Foodbank (BFB) needs to collect personal data from you to allow us to manage your records, improve our services, and report to our funders. Some information, like your name, address and date of birth, are needed to help us find your records should you visit us again. Other questions are voluntary but answering them will help your adviser to understand your situation and advocate on your behalf better.

We may also need to contact other agencies on your behalf to discuss your situation, and to obtain personal information about you from them; this may include medical records. We cannot do any of this without your permission.

The law requires us to keep your data safe. It will be encrypted and stored at a safe UK data centre. Only Bow Foodbank and its authorised agents will have access to your personal information, and it will not be shared with any third party unless you give us your consent to do so, or in exceptional circumstances where we are legally obliged to report suspected child abuse or acts relating to terrorism – please see our confidentiality policy for further details.

Your data will be processed by us in accordance with the Data Protection Act 2018 and in accordance with our Data Protection policy. Your data will be kept for 6 years and then destroyed. You have the right to see any data we hold about you and to correct any inaccuracies; we will aim to respond in full to any such request within 40 days or less.

Consent to hold data

We would like to add your details and information to our confidential database to enable us to

- Manage your case efficiently and effectively
- Produce anonymous statistics for use by other organisations such as our funders.

If you agree to this please sign below.

Consent to be contacted for evaluation purposes

We may from time to time wish to contact you to find out what you thought of our services.

If you agree to this please sign below.

Consent for external file review

In order to maintain the high quality of our advice, we may from time to time ask an external agency to review your file.

If you agree to this please tick the boxes that apply and sign below:

I give permission for Bow Foodbank to contact me for evaluation purposes	☐
I give permission for my file to be reviewed by an external agency	☐

Name _____

Signature _____

Date _____

APPENDIX 3

Guest Privacy Notice

Our promise

Bow Foodbank respects your privacy. We keep your information safe.

How we collect and use your information

When you first register with us, we will ask you some questions.

We will use this information to understand what you need and to give you the best support we can.

What information we collect

We only ask for what we really need, such as:

- Your **name, age, address and contact details**.
- Information about your **family** (like how many children you have).
- Extra information if you need more help (like housing situation, benefits, etc.)

How we use your information

We use your information to:

- Make sure you and your family get the right food.
- Help you find other services that can support you.

When we share your information

We do not sell your information. We only share your information:

- if you ask us to, for example, to get help from another service. We will show you what we plan to share first.
- if we are worried about someone's safety and need to contact safeguarding services, or
- if the law says we must share it.

How long we keep your information

We only keep your information for six years. After six years, we safely delete it.

Anonymous information

Sometimes we share numbers about our work, like how many guests we helped each week. We never include your name or any information that could identify you.

How we protect your information

Your information is typed into a secure system called **PLINTH**.

- **PLINTH** keeps your information safe online.
- Your information is hosted within the EU (at [europe-west3](#)).
- Only the staff and trained volunteers who are helping you can see your information.

- We use passwords and other security measures to protect your information.

Your rights to information

You have the right to:

- See the information we have about you.
- Ask us to correct information that is wrong.
- Ask us to delete your information, where the law allows.

You can read about your individual rights here: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

If you'd like to make any requests about your data, please review our full policy for details. You can also talk to a member of staff at the foodbank.

This will not affect your eligibility for services.

Who looks after your information

The data controller is responsible for making sure your information is kept safe and used properly.

The data controllers are the Trustees and Executive Director of Bow Foodbank. You can see who they are on our website.

Changes to this Notice

We review this notice every year.

If we make an important change, we will email you or tell you in person.

Questions

If you have questions, or want changes to your information, please email info@bowfoodbank.org.

Our full Data Protection Confidentiality and Security Policy are available on our website.

APPENDIX 4

Bow Foodbank Privacy Notice for Volunteers

The Bow Foodbank needs your consent to store and process your personal data to work with you as a volunteer, so that we can communicate with you, so we know who our volunteers are, and to deliver our duties as a charity. We follow the GDPR directive rules; we won't sell or share your data with anyone else. If you disagree we will not be able to contact you about volunteering opportunities.

APPENDIX 5

BOW FOODBANK RETENTION GUIDELINES

Type Of Information	Subject	Retention Period
Personal Information	Guests	6 years
Bank Information	Staff, Volunteers	6 months
Employee Records	Staff	6 years
Payroll and PAYE information	Staff	3 years after the end of the relevant financial year
Leave and sickness records	Staff	3 years
Health and Safety records	Volunteers	3 years
Ex-employee records	Staff	6 years after the employment ends
Dismissals and redundancies	Staff and Volunteers	7 years
Job Applications and interview notes	External Subjects / HR	1 year

APPENDIX 6

Bow Foodbank Data Protection PROCEDURE – what if it all goes wrong?

WHAT ARE THE MOST LIKELY BREACHES OF DATA PROTECTION?

The most likely cause of data breach is from volunteers not following agreed confidentiality, or not using passwords properly, or not disposing of registration forms safely. It is possible there may be deliberate misbehaviour, but it is not apparent what advantage can be gained from sharing the data we keep on our users.

Plinth, Volunteer, and Mailchimp are strongly protected by encryption. Our contracts with the software providers commit to compliance with GDPR.

To see Plinth's Security, Scale and Resilience Policy, follow this link:

<https://docs.google.com/document/d/1PFckOTFipbz1lW7oxNHh13TwusJ81KD4ASuvZ7uFC8Q/edit?tab=t.0#heading=h.yy5wgwwwo17b>

To see Volunteer's Security Policy, follow this link: <https://volunteero.org/security-policy>

To see Mailchimp's Security Policy, follow this link: <https://mailchimp.com/about/security/>

WHO LEADS ON DATA PROTECTION AND BREACHES?

The Executive Director, Joanna Read (Data Controller), will lead if available. In her absence any Trustee will lead. All the Trustees have been identified as the Data Controller.

WHAT TO DO IF WE HAVE A BREACH OF DATA PROTECTION?

Trustees will assess the seriousness of the situation and respond accordingly. If it is serious, they will contact the ICO.

The software allows an audit to see who has accessed the system, and identifies the IP address they did so from. **We will do such an audit if we believe someone accessed the software inappropriately.**

According to the ICO guidance on reporting a breach: "If you experience a personal data breach you need to consider whether this poses a risk to people. **You need to consider the likelihood and severity of the risk to people's rights and freedoms, following the breach.** When you've made this assessment, if it's likely there will be a risk then you must notify the ICO; if it's unlikely then you don't have to report. You do not need to report every breach to the ICO."

You can find the ICO's full guidance here:

<https://ico.org.uk/for-organisations/report-a-breach/>

IF A USER REQUESTS THEIR DATA BE DELETED OR THE DETAILS ARE INCORRECT

We will respond promptly, and initiate the action with Plinth or Volunteero. However, our Data Processing Agreement with them in section 10 refers to 30 days to delete, and 90 days to fully and finally comply.

We will keep a **LOG OF ALL DATA EVENTS**, breaches, requests for deletion or changing data, or a significant learning point, e.g. about awareness of risk or about Data protection, in the following table:

Date	Event	Action