

DATA PROTECTION (GDPR) POLICY

1. Introduction

Blacon Community Trust is committed to protecting the privacy and personal data of our volunteers, employees, beneficiaries, and partners. This policy outlines our commitment to data protection and compliance with the General Data Protection Regulation (GDPR).

2. Scope

This policy applies to all personal data processed by Blacon Community Trust, including data related to our volunteers, employees, beneficiaries, and partners. It covers data collected, stored, processed, shared, and destroyed by Blacon Community Trust.

3. Objectives

The objectives of this policy are to:

- Ensure compliance with GDPR and other relevant data protection legislation.
- Protect the rights and privacy of individuals whose data we process.
- Provide a framework for the secure and lawful handling of personal data.
- Maintain the trust and confidence of our volunteers, employees, beneficiaries, and partners.

4. Data Protection Principles

Blacon Community Trust is committed to processing personal data in accordance with the following data protection principles:

- **Lawfulness, Fairness, and Transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimisation:** Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Personal data will be accurate and, where necessary, kept up to date.
- **Storage Limitation:** Personal data will be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and Confidentiality:** Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

5. Legal Basis for Processing

Blacon Community Trust will only process personal data where there is a lawful basis for doing so. The lawful bases include:

- **Consent:** The individual has given clear consent for Blacon Community Trust to process their personal data for a specific purpose.
- **Contract:** The processing is necessary for a contract Blacon Community Trust has with the individual or because they have asked Blacon Community Trust to take specific steps before entering into a contract.
- **Legal Obligation:** The processing is necessary for Blacon Community Trust to comply with the law.
- **Vital Interests:** The processing is necessary to protect someone's life.
- **Public Task:** The processing is necessary for Blacon Community Trust to perform a task in the public interest or for Blacon Community Trust's official functions, and the task or function has a clear basis in law.
- **Legitimate Interests:** The processing is necessary for Blacon Community Trust's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

6. Individual Rights

Blacon Community Trust is committed to upholding the rights of individuals under GDPR, including:

- The right to be informed about the collection and use of their personal data.
- The right to access their personal data and supplementary information.
- The right to rectification of inaccurate or incomplete personal data.
- The right to erasure of personal data, also known as the 'right to be forgotten'.
- The right to restrict processing of personal data.
- The right to data portability, allowing individuals to obtain and reuse their personal data for their own purposes across different services.
- The right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, direct marketing, and processing for purposes of scientific/historical research and statistics.
- Rights related to automated decision making and profiling.

7. Data Security

Blacon Community Trust will implement appropriate technical and organisational measures to ensure the security of personal data, including:

- **Access Control:** Limiting access to personal data to those employees, volunteers, and partners who need it to fulfil their roles.
- **Data Encryption:** Using encryption to protect personal data where appropriate.
- **Physical Security:** Ensuring physical security measures are in place to protect personal data stored in hard copy.
- **Regular Audits:** Conducting regular audits to assess and improve data security measures.

8. Data Breaches

In the event of a data breach, Blacon Community Trust will follow the procedures set out in our Data Breach Response Plan, including:

- **Immediate Action:** Taking immediate steps to contain and mitigate the breach.
- **Notification:** Informing the relevant authorities and affected individuals where required by law.
- **Investigation:** Conducting a thorough investigation to understand the cause of the breach and prevent future occurrences.
- **Documentation:** Keeping detailed records of the breach and Blacon Community Trust's response.

9. Data Protection Officer

Blacon Community Trust will appoint a Data Protection Officer (DPO) who will be responsible for overseeing compliance with this policy and GDPR, including:

- Advising Blacon Community Trust and its employees and volunteers on data protection obligations.
- Monitoring compliance with GDPR and Blacon Community Trust's data protection policies.
- Providing training and raising awareness on data protection.
- Acting as the contact point for the Information Commissioner's Office (ICO).

10. Training and Awareness

Blacon Community Trust is committed to ensuring that all employees and volunteers receive appropriate training on data protection and GDPR. This will include:

- **Induction Training:** Providing data protection training as part of the induction process for new employees and volunteers.
- **Ongoing Training:** Offering regular training sessions to keep employees and volunteers up to date with data protection requirements and best practices.

11. Review and Update

This policy will be reviewed annually by the Board of Trustees to ensure its effectiveness and compliance with GDPR and other relevant legislation. Any necessary updates will be made and communicated to all employees and volunteers.

12. Contact Information

For any questions or concerns about this policy or data protection at Blacon Community Trust, please contact our Data Protection Officer at:

Data Protection Officer
Blacon Community Trust
C/O Dee Point Primary School
Blacon Point Road
Blacon
Chester

CH1 5NF
England
United Kingdom

13. Approval

This Data Protection (GDPR) Policy was approved by the Board of Trustees on 25th September 2024.