



## Data Protection & GDPR Policy

'User' refers to anyone using Age Concern Petersfield & District's services, and 'Employees' refers to paid staff and volunteers.

### Principles

To operate effectively Age Concern Petersfield & District needs to collect, store and share personal information about users and employees. This personal information will be processed in accordance with the General Data Protection Regulations 2018 (GDPR).

Age Concern Petersfield & District is committed to Article 5 of the GDPR which requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures appropriate security of the personal data.

## Informed Consent

Age Concern Petersfield & District will seek clear, informed consent from users and employees for them to process their personal data. Consent forms the legal basis for processing personal data in accordance with the GDPR 2018.

Consent is sought through a form that is completed by the user or employee. The consent form stipulates:

- a) Why their personal information is required
- b) What information is stored
- c) How this information is stored
- d) Who this information is shared with

Users and employees are asked to tick Yes/No against individual items to give or deny consent to storing and sharing personal information within Age Concern Petersfield & District, and receiving information from them about charity news or additional services.

Should a user or employee not wish to consent to Age Concern Petersfield & District collecting, storing or sharing their personal data the consequences of this are made clear to that person.

Users and employees are asked to indicate which forms of communication they consent to Age Concern & Petersfield using when contacting them.

User and employee consent options are recorded on a central database and adhered to in all communication from Age Concern Petersfield & District.

## Data Storage & Security

Personal information is stored on a central Google Drive database that is securely protected. The Manager and Finance Officer of Age Concern Petersfield & District are responsible for the data security and maintenance of the database. The central Google Drive database is only accessible by the Manager, Finance Officer, Co-ordinator and the Chair of Trustees.

Data stored on hardware, rather than cloud software, that is central to the running of the charity, is regularly backed up.

Personal information is also shared with authorised employees of Age Concern Petersfield & District relevant to the services they are involved in running such as the Lunch Club Co-ordinator, and the minibuses drivers. These employees may not have access to the central Google Drive database and in this case Age Concern Petersfield & District share only the information needed by them to provide a service to the user.

All employees sign an agreement (as part of their application form) to treat any information given to them as confidential. Employees are also required to ensure the secure storage of data. In practice this means paper information is stored in a locked place accessible only by the authorised employee; electronic information is stored only on an IT device that is password protected.

## Data Accuracy

Personal data is updated on an ongoing basis, and annually as a specific exercise, to ensure it is up to date and still relevant for the purposes intended. This is carried out by the Manager.

When a user or employee leaves Age Concern Petersfield & District their details are erased unless they have consented to receive updates from Age Concern Petersfield & District and it is relevant to keep them informed.

## Data Retention and Disposal

All paper records no longer required are shredded. All hardware on IT devices that are to be disposed of are cleaned of Age Concern Petersfield & District data before being relinquished.

When an employee leaves, or a client no longer requires our services, their contact details and date of leaving will be held for a period of 7 years in an archive system stored on Google Drive. After this time it will be permanently deleted. If a client or employee dies we will hold their records for one year after their death.

Financial information is archived for 7 years and stored securely at the Winton House Centre.

## Data Access

Users and employees are entitled to request a copy of the records Age Concern Petersfield & District hold for them at any time. They are also entitled to change or withdraw consent at any time. Contact details are provided to users and employees should they wish to do this, and provided at the end of this policy.

## Responsibilities

Overall responsibility for ensuring that Age Concern Petersfield & District complies with its data protection regulations lies with the Board of Trustees. The administrative functions of data maintenance and storage is delegated to authorised employees.

## Contact

Manager  
Age Concern Petersfield & District  
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18 High Street  
Petersfield  
GU32 3JL

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## Review

This policy will be reviewed annually.

Issue	Date agreed by Board	Date of next review
1	13.9.18	13.9.19
2	5.9.24	5.9.27