

## Data Protection Policy

### Context and Overview

#### Introduction:

Aspyre Africa needs to keep certain information on its trustees, beneficiaries and donors to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers trustees, volunteers, beneficiaries, donors and charity contacts.

#### Definitions:

In line with the Data Protection Act 1998 principles, Aspyre Africa will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.

- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

## Type of information processed:

Aspyre Africa processes the following personal information:

- Trustees – contact details and connections
- Volunteers – contact details and connections
- Beneficiaries – personal details, images, video clips
- Donors – contact details, job title and employer, contact history, donation history, brief meeting notes, connections, fields of interests
- Charity contacts (suppliers, partners, collaborators,...) - contact details and connections

Personal information is kept in the following forms:

- Excel and/or Word file
- Database (Donorfy)

People within the organisation who will process personal information are:

- Veronique Cowan
- Savina Geerinckx

## Responsibilities:

Under the Data Protection Guardianship Code, overall responsibility for personal data in a voluntary organisation rests with the governing body. In the case of Aspyre Africa, this is the Board of Trustees.

The governing body delegates tasks to the Data Controller. The Data Controller, Marie-Laure Prévost, is responsible for:

- identifying potential problem areas or risks
- producing clear and effective procedures

Veronique Cowan and Savina Geerinckx who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy will result in disciplinary proceedings.

## **Policy implementation:**

To meet our responsibilities, we will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

## **Training:**

Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:

On induction:

- Provide a copy of the Data Protection Policy and ask to sign it
- Ask not to disclose password and log in details for Donorfy
- Ask not to share Excel and/or Word files

General training/ awareness raising:

- Regular reminder at Board meetings about the policy

## Gathering and checking information:

Before personal information is collected, we will consider:

- What information we need
- How long we are going to retain it for

We will inform people whose information is gathered about the following:

- Why the information is being gathered
- What the information will be used for
- Who will have access to their information

We will take the following measures to ensure that personal information kept is accurate:

- By sending reminders to people asking them to check their details

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

## Retention periods:

Aspyre Africa will ensure that information is kept according to the following retention periods guidelines:

- Personal data of donors – until the person ask to be removed from database
- Personal data of beneficiaries – 10 years after the programme has ended
- Personal data of trustees and volunteers – 5 years after the person has left the organisation
- Personal data of charity contacts - until the person ask to be removed from database

## Data security:

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- Access to the database will be limited to Veronique Cowan and Savina Geerinckx
- Computers will have adequate security system
- Password protection of personal information files

The board and trustees are accountable for compliance of this policy. A trustee could be personally liable for any penalty arising from a breach that they have made. Any unauthorized disclosure made by a volunteer may result in the termination of the volunteering agreement.

## Procedure in case of a breach:

When a breach of data protection occurs, consideration will be given to reviewing practices. In addition, Aspyre Africa will consider whether the breach should be reported to the Information Commissioner.

## Subject access requests:

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should write to the charity at [info@aspyreafrica.org](mailto:info@aspyreafrica.org). We may make a charge of £10 on each occasion access is requested.

The following information will be required before access is granted:

- Full name and contact details of the person making the request
- Their relationship with the organization

We may also require proof of identity before access is granted. The following forms of ID will be required:

- Driving license or passport

Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible but will ensure it is provided within the 40 days required by the Act from receiving the written request.

## Review:

This policy will be reviewed at intervals of 2 years to ensure it remains up to date and compliant with the law.

*Policy reviewed and approved by the board on 22/5/2018*