

# THE FATHER IGNATIUS MEMORIAL TRUST

## DATA PROTECTION POLICY 2018

### 1. Introduction

The Father Ignatius Memorial Trust (FIMT) needs to collect and use names, titles and postal addresses of the Friends of the Father Ignatius Memorial Trust (subscribers to the FIMT annual newsletter) in order to carry on its work. This personal information is collected and dealt with appropriately whether it is recorded on paper or stored in a computer database; there are safeguards to ensure this under the Data Protection Act 1998 and as amended by future legislation and regulations including the General Data Protection Regulation 2018.

### 2. Data Controller

The FIMT is the Data Controller under the Act, which means that it determines for what purposes personal information held will be used. It is responsible for notifying, if necessary, the Information Commissioner of the data it holds or is likely to hold and the general purposes for which this data will be used.

### 3. Disclosure

The FIMT does not normally share data with any other agencies. There are exceptional circumstances where the law allows the FIMT to disclose data without the data subject's consent. These include:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting the vital interests of an individual where the individual has already made the information public
- c) Conducting any legal proceedings, obtaining legal advice or defending any legal rights

The FIMT regards the lawful and confidential treatment of personal information as very important. To ensure that personal information is treated lawfully and correctly, the FIMT will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998, and as amended in the future.

Specifically, the Principles require that personal information shall be:

- a) processed fairly and lawfully and shall not be processed unless specific conditions are met
- b) obtained only for the purposes specified in the Act, and shall not be processed in any manner incompatible with those purposes
- c) adequate, relevant and not excessive in relation to those purposes
- d) accurate and kept up to date
- e) not kept for longer than is necessary
- f) processed in accordance with the rights of data subjects under the Act,
- g) kept secure by those handling data who take appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information
- h) not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal information.

The FIMT will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure and maintain the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act.

These include:

- the right to be informed that data processing is being undertaken
- the right of access to one's personal information

- the right to have one's personal information deleted securely on request
- the right to correct or erase information which is regarded as wrong information.
- Take appropriate technical and organisational security measures to safeguard personal information
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- When a request by an individual is made regarding data held about that individual, the data holder will provide all relevant information.

#### **4. Data collection**

Informed consent applies when an individual clearly understands why their information is needed, whether it will be shared, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data, and then gives their consent

The FIMT will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, the FIMT will ensure that the individual:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the individual decide not to give consent to data collection
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be collected
- d) Is, as far as reasonably practicable to establish, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used
- f) Is aware that their data can be deleted securely on request

#### **5. Data Storage**

Information and records relating to Friends of the FIMT will be stored securely and will only be accessible to authorised persons.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

It is responsibility of the data holders to ensure all personal data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

#### **6. Data access and accuracy**

All individuals have the right to access the information the FIMT holds about them. The FIMT will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes. In addition, the FIMT will ensure that:

- Everyone processing personal information understands that they are responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will review the way it holds, manages and uses personal information on an annual basis

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with the Data Protection Act 1998 and any amendments to it, including the General Data Protection Regulation 2018.