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Appendix 1. Table of database fields and our lawful basis for holding data.

## 1. ORGANISATION

### 1.1. Details of the organisation covered by this policy:

Name: inHope (Trading name of inHope (Bristol) Limited)  
Registered Address: 32 Stapleton Road, Easton, Bristol, BS5 0QY  
Telephone No.: 0117 330 1230  
E-mail: [admin@inhope.uk](mailto:admin@inhope.uk)  
Charity Registration: 298528  
Company Registration: 02214814

Insurance provider: Ansvar Insurance, Policy Number CCP 6072585.  
Includes Public Liability Insurance

### 1.2. The Data Protection Officer (Data Controller) for inHope is:

**John Dixon** (Trustee)

E-mail: [admin@inhope.uk](mailto:admin@inhope.uk)

Tel: 0117 330 1230

### 1.3. The charity is registered with the Information Commissioners Office:

**Data Protection Registration Number: Z2781967**

### 1.4. inHope have their registered offices and primary administrative office location at the address given above. The services of inHope operate from a range of locations in the Bristol area and occasionally beyond (for specific organised events and activities). These addresses are given in CCM D122.

### 1.5. The range of activities undertaken by inHope are described on the website (<https://www.inhope.uk/>).

### 1.6. inHope operate a housing franchise – Hope into Action: Bristol. Under the franchise a wide number of parties including tenants, referral partners, Hope into Action UK, partners churches with their volunteer team, and the Hope into Action: Bristol team themselves need to manage data in accordance with Data Protection and GDPR requirements. inHope procedure CCM P107 seeks to bridge between this policy and the Hope into Action policy.

## 2. COMMITMENT

### 2.1 The leadership (Trustees, CEO and Management Team) of inHope recognise the need to ensure that all forms of data collected and used in the running of its charitable activity need to be protected from misuse and unlawful disclosure.

As a Leadership we have therefore adopted the policy and procedures set out in this data protection policy that has been drafted based on guidance from the statutory body, the Information Commissioners Office (ICO). We are committed to building constructive links with statutory and voluntary agencies involved in data protection.

2.2 The Leadership undertakes to:

- Endorse and follow all national legislation and procedures in relation to data protection;
- Provide on-going data protection training for all its workers (trustees, staff and volunteers) and will regularly review the associated operational guidelines;
- Ensure that the systems and processes deployed in the running of the charity comply with data protection requirements;
- Support the Data Protection Officer(s) in their work and in any action they may need to take in order to protect from the misuse or unlawful disclosure of data;

**3. AIM**

- 3.1. The purpose of this policy is to outline the duty and responsibility of staff, volunteers and trustees working on behalf of the organisation in relation to data protection.
- 3.2. This policy will be the basis from which inHope writes and updates its public facing Privacy Policy.

**4. OBJECTIVES**

- 4.1. To explain the responsibilities the organisation and its staff, volunteers and trustees have in respect of data protection.
- 4.2. To provide staff with an overview of data protection and its application.
- 4.3. To provide a clear procedure that will be followed when data protection issues arise.

**5. LEGAL FRAMEWORK**

- 5.1. The following legal acts are pertinent to this policy:
- 5.1.1. Data Protection Act 2018.
- 5.1.2. General Data Protection Regulations 2018.

**6. POLICY REVIEW**

- 6.1. This policy, and its associated policies and procedures, will be reviewed annually (in May) by the board of trustees.
- 6.2. The Board will review data protection performance over the previous year; review this policy and related documents, checking for any changes in the legislation; plan for any known future events like a policy change or data impacting business change.

**7. AWARENESS OF DATA PROTECTION**

- 7.1. Part of the induction of new staff, trustees and volunteer Duty Managers, and Foodbank Outlet Team Leaders will be to read this policy and to be trained on the processes required by the policy that are relevant to their role.

- 7.2. Awareness is especially important for those working directly with beneficiaries (clients, service users), those in fundraising and communications, administration, finance, and managers. As such this policy covers all departments of inHope. As Directors of the organisation, trustees also need to be made aware.
- 7.3. In addition to initial training, there will be an annual refresher training where practice and data protection incidents will be reviewed and any policy and procedure revisions communicated. This refresher training will follow on from the policy review undertaken by the trustees, see section 6.

## **8. INFORMATION HELD BY inHope**

- 8.1. inHope has a number of places where it holds personal data and takes measures to ensure that the only data held is that for which consent has been granted and/or a legitimate interest exists for it to be held.
- 8.2. Data is stored by inHope in the following manner:
  - 8.2.1. Online Raisers Edge (RENXT) and eTapestry (operated by Blackbaud) database;
  - 8.2.2. Online Assemble database;
  - 8.2.3. inHope network server and the Office 365 environment;
  - 8.2.4. Google forms;
  - 8.2.5. Online accounting system, XERO;
  - 8.2.6. Online HR system, BreatheHR;
  - 8.2.7. Paper files.
- 8.3. Data is held by the following third parties:
  - 8.3.1. The Thirtyone:eight website (DBS application information);
  - 8.3.2. inHope's retained payroll agency.
- 8.4. Data held on the eTapestry database is defined in the table given in Appendix 1 of this policy.
- 8.5. Data held in relation to the Bristol Churches Shelter project is held within inHope Office 365 SharePoint, a Google Drive environment and on a Better Impact database. A project specific data policy has been created.

## **9. WHAT WE USE INFORMATION FOR**

For all categories of individuals and groups, the charity may use and retain personal information pertinent to the fulfilment of its legal responsibilities, health and safety, and safeguarding obligations.

- 9.1. Employee information is used for:
  - 9.1.1. Employee recruitment and the monitoring thereof e.g. verification of personal details, collection of references, communication regarding training and induction, application for DBS checks;
  - 9.1.2. Payroll;
  - 9.1.3. HR management;
  - 9.1.4. Communicating with employees;
  - 9.1.5. Fulfilling the charity's employer responsibilities;
  - 9.1.6. Fulfilling the charity's insurance obligations;

- 9.1.7. Sending subscribed e-mail or print newsletters.
- 9.2. Volunteer information is used for:
  - 9.2.1. Volunteer recruitment and the monitoring thereof e.g. verification of personal details, collection of references, communication regarding training and induction, application for DBS checks;
  - 9.2.2. Communicating with volunteers;
  - 9.2.3. Fulfilling the charity's insurance obligations;
  - 9.2.4. Keeping a record of who is volunteering when;
  - 9.2.5. Identifying roles (e.g. Duty Manager);
  - 9.2.6. Recording volunteer attainments (e.g. training attended);
  - 9.2.7. Sending subscribed e-mail or print newsletters.
- 9.3. Donor information is used for:
  - 9.3.1. Substantiating our gift aid claims;
  - 9.3.2. Sending postal or e-mail 'thank you' letters for in-kind or monetary donations;
  - 9.3.3. Sending an annual summary of regular monetary donations;
  - 9.3.4. Informing specific donors of charity developments and needs;
  - 9.3.5. Sending subscribed e-mail or print newsletters.
- 9.4. General supporter information is used for:
  - 9.4.1. Sending subscribed e-mail or print newsletters.
- 9.5. Member information is used for:
  - 9.5.1. Communicating with members regarding governance matters relating to the charity;
  - 9.5.2. Inviting members to the AGM of the charity;
  - 9.5.3. Notifying members of resolutions and votes to be held at the AGM;
  - 9.5.4. Where the charity needs to call an EGM;
  - 9.5.5. Sending subscribed e-mail or print newsletters.
- 9.6. Trustee information is used for:
  - 9.6.1. Communicating with trustees regarding the governance of the charity;
  - 9.6.2. Sending subscribed e-mail or print newsletters.
  - 9.6.3. For trustees the charity stores:
    - 9.6.3.1. Full name;
    - 9.6.3.2. Address (registered with Companies House, CH, and the Charities Commission, CC);
    - 9.6.3.3. Country of Residence (CH);
    - 9.6.3.4. Nationality (CH);
    - 9.6.3.5. Occupation (CH);
    - 9.6.3.6. E-mail address;
    - 9.6.3.7. Telephone number;
    - 9.6.3.8. Declared interests including other trusteeships (inHope);
    - 9.6.3.9. Church attended;
    - 9.6.3.10. Date elected;

- 9.6.3.11. Referee details and comments;
- 9.6.3.12. DBS check details;
- 9.6.3.13. Date when term in office expires.
- 9.6.4. Data for former trustees may be retained through documents such as Statements of Annual Accounts and Trustees report and biographies shared as part of AGM packs. Companies House will continue to hold a record of former trustees as will the charity though the level of information required reduces on an ongoing basis.
- 9.7. Client information is used for:
  - 9.7.1. Maintaining a record of the support given to the client and conversations held;
  - 9.7.2. Communicating with clients;
  - 9.7.3. Keeping records of clients use of the charity's projects/services;
  - 9.7.4. Staff notes to help when advocating for clients to other agencies;
  - 9.7.5. Monitoring and reporting on the impact of the charity;
  - 9.7.6. Client incident investigation, reporting and communications.
- 9.8. Corporate information is used for:
  - 9.8.1. Communicating with corporate contacts;
  - 9.8.2. Arranging activities and events involving corporate partners e.g. volunteering days, fundraising events;
  - 9.8.3. Marketing;
  - 9.8.4. Sending postal or e-mail 'thank you' letters for in-kind or monetary donations;
  - 9.8.5. Informing corporates of charity developments and needs;
  - 9.8.6. Sending subscribed e-mail or print newsletters.
- 9.9. How we obtain data:
  - 9.9.1. Employees: application form, cover letter, references, new start form, P45 or Employee Checklist, passport, ID verification documents for DBS checks, driving license (where applicable), personal vehicle details and communications opt-in;
  - 9.9.2. Volunteers: application form, cover letter, references, ID verification documents for DBS checks, driving license (where applicable), personal vehicle details and communications opt-in;
  - 9.9.3. Donors: via the method of giving adopted by the donor e.g. on-line platforms, inHope bank statements, donor correspondence;
  - 9.9.4. General Supporters: via communications opt-in;
  - 9.9.5. Members: membership sign up form and communications opt-in;
  - 9.9.6. Trustees: volunteer documents, ID verification documents for DBS checks, membership documents, Trustee Declaration of Eligibility and Trustee Declaration of Interests;
  - 9.9.7. Clients: referral forms, directly from the client (written and verbal), staff/volunteer notes, applications/enrolment forms;
  - 9.9.8. For purposes of data analysis but not communication the charity retains historical records of all categories of individuals.

## 10. COMMUNICATING PRIVACY INFORMATION

- 10.1. We communicate privacy information by publishing a Privacy Policy on our website either individually or as part of our wider 'terms and conditions of use' page. This privacy policy cover use of the website, those who support the charity as donors and/or general supporters and members. Once someone enquires about a job vacancy, they would be provided with our **Staff Privacy Notice** as part of the job application pack. Prospective volunteers will be provided with our **Volunteer Privacy Notice** as part of the invitation to apply.
- 10.2. We may change our privacy policy from time to time to take into account changes in our processes or changes to the law. We will always give a "last updated date" so you can see when minor changes may have been made. In the case we make more significant revisions we will communicate this on our website and via subscribed e-mail and print letters.

## 11. INDIVIDUAL'S RIGHTS

- 11.1. Individuals providing personal data to the charity have the following rights:
- 11.1.1. The right to be forgotten;
  - 11.1.2. The right of data portability;
  - 11.1.3. The right to withdraw consent;
  - 11.1.4. The right to object to processing;
  - 11.1.5. The right of subject access;
  - 11.1.6. The right to rectification;
  - 11.1.7. The right to restrict processing;
  - 11.1.8. The right not to be subject to automated decision-making including profiling.
- 11.2. The exercise of the above rights is as given in the Privacy Policy, Staff Privacy Policy and Volunteers privacy Policy.

## 12. SUBJECT ACCESS REQUESTS

- 12.1. The charity's Privacy Policy covers the mechanism for making a subject access request. inHope will aim to respond to such requests within seven days.
- 12.2. In some cases the statutory obligations of the charity may mean that a request is refused or only completed in part with some caveats. In such cases inHope will advise the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. Such complaints must be made without undue delay and at the latest, within one month of such a notification.

## 13. LAWFUL BASIS FOR PROCESSING DATA

- 13.1. Our lawful basis for processing general supporter data is the consent which they have given to us as part of registration or as an option when donating or contacting us for other purposes.

- 13.2. Our lawful basis for processing staff and volunteer data is outlined specifically in our staff and volunteer privacy notices.
- 13.3. Our lawful basis for processing members and trustee data is so the charity can fulfil its statutory obligations as a limited company and registered charity and so we can keep them informed of changes to governance, annual reports and AGM invitations.
- 13.4. Our lawful basis for processing client data is so the charity can provide a fair and equitable service to its beneficiaries, and to prevent abuses to the services available.
- 13.5. Where we have collected personal information in relation to meeting our Safeguarding obligations it is also important that this data is retained in order for us to act to protect vulnerable adults, and children.

## 14. CONSENT

- 14.1. Consent must be freely given, specific, informed and unambiguous. The charity will offer a positive opt-in – consent will not be inferred from silence, pre-ticked boxes or inactivity.
- 14.2. Consent will be separate from other terms and conditions, and simple ways for individuals to withdraw consent are readily available.
- 14.3. Consent will be verifiable.
- 14.4. The charity notes that individuals generally have more rights where we rely on consent to process their data.
- 14.5. In line with best practice the charity aims to make it convenient where possible for individuals to be able to withdraw consent. In regard to e-mail communications we use one click unsubscribe links in all e-mailed supporter communications which will automatically unsubscribes users from that particular communication method. The option to update other communication preferences will also be available.

## 15. CHILDREN AND VULNERABLE ADULTS

- 15.1. For volunteers who are under 18 years of age, parent/guardian/carer consent is required prior to volunteering. inHope's Volunteering Policy covers the recruitment process of volunteers with age specific requirements. The Volunteer Privacy Notice applies to both the volunteer and their parent/guardian/carer, where their data is processed.
- 15.2. The charity does not distinguish or identify children who have subscribed to e-mail or print newsletters.
- 15.3. Where we do store data related to child volunteers and/or supporters this will be with the same rigour as in any other data storage and processing.
- 15.4. In certain cases we may need to record or use data for either adults identified to us to be vulnerable or children in the fulfilment of the charity's Safeguarding obligations, which in some cases may conflict with the rights of an individual to be forgotten for example. Please refer to our ***Safeguarding Policy*** for further details.



## **16. DATA BREACH**

- 16.1. Should inHope be subject to a data breach or we later find out that our data was breached historically we will contact all those we know to be affected giving as detailed an account as we are able.
- 16.2. The charity will notify the ICO in any incident of data breach.
- 16.3. The charity undertakes to regularly review its data security policies and practices.

## **17. DATA PROTECTION BY DESIGN AND DATA PROTECTION IMPACT ASSESSMENTS**

- 17.1. The GDPR makes privacy by design an express legal requirement, under the term 'data protection by design and by default'.
- 17.2. Where inHope starts a new type of project, expands its work or changes the way we use data in our existing activities, we will consider data protection and involve the designated Data Protection Officer.
- 17.3. Data Protection Impact Assessments are not mandatory for the work inHope.

## **18. DATA PROTECTION OFFICERS**

- 18.1. Whilst inHope are under no legal requirement to have a Data Protection Officer, the charity has chosen to appoint one given the importance of data protection and the risk of making mistakes without a clear responsibility defined.
- 18.2. The Data Protection Officer will take proper responsibility for fulfilling our data protection compliance and have the knowledge, support and authority to carry out their role effectively or be supported to gain this knowledge where it is lacking.
- 18.3. It is the responsibility of the Data Protection Officer to ensure the policy is well understood throughout the organisation including communicating the presence and any changes to the policy through the provision of, or inclusion in, training and induction activities as well as external communications.
- 18.4. As a governance role, the Data Protection Officer will come from within the Board of Trustees and default to the Chair in lieu of an appointment.
- 18.5. The Data Protection Officer is responsible for the ongoing ownership of this document including the initiation of the annual review and incidental updates that may be required as well as the relevant communications and training around data protection, though these items may be delegated to a responsible person within the staff team.

## **19. RELATED POLICIES, PROCEDURES AND PRACTICE GUIDES**

- 19.1. inHope Privacy Policy; CCM P072.
- 19.2. Staff Privacy Notice; CCM P069.
- 19.3. Volunteer Privacy Notice; CCM P070.
- 19.4. Volunteering Policy; CCM P023.
- 19.5. Safeguarding Policy; CCM P043.
- 19.6. inHope Member Sign up Form; CCM F041.
- 19.7. Personal Data Access Request; CCM P073.
- 19.8. HiA: Bristol Data Protection Procedure; CCM P107.
- 19.9. inHope Premises List; CCM D122.

**Appendix 1. Table of database fields and our lawful basis for holding data**

| <b>Field</b>   | <b>Staff</b> | <b>Volunteer</b> | <b>Donor</b> | <b>General<br/>Supporter</b> | <b>Member</b> | <b>Trustee</b> | <b>Client*</b> |
|--|--------------|------------------|--------------|------------------------------|---------------|----------------|----------------|
| Full name  | Yes          | Yes              | Yes          | Yes                          | Yes           | Yes            | Yes            |
| Date of birth  | Yes          | Yes              | No           | No                           | Yes           | Yes            | Yes            |
| Home church  | Yes          | Yes              | Optional     | Optional                     | Optional      | Yes            | No             |
| Home postal address  | Yes          | Yes              | Optional     | Optional                     | Yes           | Yes            | Yes            |
| Work postal address  | Yes          | No               | No           | No                           | No            | No             | No             |
| Contact phone numbers (mobile, home and/or work)   | Yes          | Yes              | Optional     | Optional                     | Optional      | Yes            | Yes            |
| Email address  | Yes          | Yes              | Optional     | Optional                     | Optional      | Yes            | Yes            |
| Webpage  | No           | No               | No           | No                           | No            | No             | No             |
| Twitter name   | No           | No               | No           | No                           | No            | No             | No             |
| If the person is the family member of another person on our database (Avoid duplicate mail outs)                       | Yes          | Yes              | Yes          | Yes                          | Yes           | Yes            | No             |
| Donation information and history including frequency of donations, which fund & purpose and gift aid status            | No           | No               | Yes          | No                           | No            | No             | No             |
| Whether they are a church rep, former staff, current staff, trustee, member, donor, fundraiser, general supporter etc. | Yes          | Yes              | Yes          | Yes                          | Yes           | Yes            | No             |
| Mailing list preferences   | Yes          | Yes              | Yes          | Yes                          | Yes           | Yes            | No             |

|   |     |     |     |     |     |     |     |
|---|-----|-----|-----|-----|-----|-----|-----|
| Contact notes   | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Volunteering information, inclusive of: <ul style="list-style-type: none"> <li>• Volunteer projects &amp; locations</li> <li>• Church referee name &amp; reference</li> <li>• Emergency contact name, phone no, relationship to volunteer</li> <li>• Relevant qualifications and medical conditions</li> <li>• Training record</li> <li>• Availability</li> <li>• Start &amp; end dates</li> <li>• DBS information</li> </ul> | No  | Yes | No  | No  | No  | No  | Yes |
| Data and notes relevant to the support being given to a client  | No  | No  | No  | No  | No  | No  | Yes |

**Note:**

The term 'client' in the above table includes the following ways of referring to the beneficiaries of the charity: service user, student, guest and tenant.