**Data Protection Policy**

**Families Need Fathers Both Parents Matter Cymru**

## Definitions

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| **Charity** | Families Need Fathers Both Parents Matter Cymru, registered charity 1134723. |
| **GDPR** | General Data Protection Regulation. |
| **Responsible Person** | means the person responsible for data protection within the Charity, which is the National Manager (currently Paul Apreda) |
| **Register of Systems** | means a register of all systems or contexts in which personal data is processed by the Charity. |

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and,
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 2. General provisions

1. This policy applies to all personal data processed by the Charity.
2. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
3. This policy shall be reviewed periodically by the charity’s Management Team.
4. As a not-for-profit charity, the Charity is exempt from registering with the Information Commissioner’s Office as an organisation that processes personal data.

### 3. Lawful, fair and transparent processing

1. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems (included below).
2. The Register of Systems shall be reviewed periodically by the charity’s Management Team.
3. At the present time the Register of Systems is: (a) Secure, restricted-access teams within the Microsoft Teams software, and, (b) Caseworker.mp database software, as supplied by Elected Technologies. Only the latter (Caseworker.mp) is used for longer term or archive storage. It is fully GDPR compliant.
4. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

### 4. Lawful purposes

1. All data processed by the charity is compliant with the published Privacy Policy.
2. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent is kept with the personal data (specifically in the form of the agreement on page 1 of the Service User Pack).
3. The right of the individual to revoke their consent will be respected by the charity upon request.

### 5. Data minimisation

1. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### 6. Accuracy

1. The Charity shall take reasonable steps to ensure personal data is accurate.
2. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### 7. Archiving / removal

1. To maximise security of confidentiality, service users’ data held temporarily within Microsoft Teams shall be held there for the minimum time necessary to transfer it for longer term storage to the Caseworker.mp database. The latter shall have more restricted access, limited to charity officers requiring the information to progress the service users’ cases consistent with the above lawful usage.
2. The archiving policy shall be based upon the Caseworker.mp record alone, with no other personal / service user data being retained long term. For purposes of monitoring and trend identification, no upper time limit has yet been placed on this data retention (subject only to an individual’s right to erasure on request).

### 8. Security

1. The Charity’s obligation to ensure that personal data is stored securely using modern software that is kept-up-to-date is taken to be discharged via usage of Caseworker.mp via Elected Technologies.
2. The arrangements in place to discharge the charity’s obligation in regard to access to personal data (i.e., being limited to personnel who need access), and in regard to appropriate security being in place to avoid unauthorised sharing of information, have been described above.
3. When personal data is deleted this will be done safely such that the data is irrecoverable.
4. Appropriate back-up and disaster recovery is in place via cloud storage with Elected Technologies.

### 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the Information Commissioner’s Office for further advice.

**This policy was last reviewed and approved by the Charity’s Management Team on…**

**Date: 9th February 2021.**