

THE WORSHIPFUL COMPANY OF SPECTACLE MAKERS' CHARITY (registered in England no 1072172)

Data Protection Policy Statement

Introduction

The Worshipful Company of Spectacle Makers' Charity (or "The Charity"), is a registered Data Controller under the Data Protection Act 1998. This Act is shortly to be superseded by the General Data Protection Regulation (GDPR) and by a new Data Protection Act in England and Wales.

The basis of the rules on Data Protection is to formalise procedures whereby organisations hold and use personal data, that is, information relating to a living person. This includes automatic data which could be traced back to an individual such as monitoring of emails or website traffic.

Data may be held in an electronic or manual form but under the Act organisations must protect access to data, must ensure that any data is processed in a fair and reasonable way and give access to the data to the individual themselves on request.

Under the Act, individuals (data subjects) have the right to add information to their records, have inaccurate data deleted and to stop information being used for marketing purposes. Individuals have a legal right to know what data is held and the purposes for which it may be used.

Individuals also have a right to know from where information was obtained and if it has been used for any automated decision-making processes such as electronic profiling.

Any individual may make a request to see data held about them (a "subject access request") at any time. Subject access requests must receive a response within a month and at no charge. Subject access requests will only be considered if made by the individual themselves or, where necessary, their legal representatives.

All questions relating to compliance or rights of access should be addressed to the Charity's Secretary, by contacting the Worshipful Company of Spectacle Makers' office on 020 7236 2932 or email to clerk@spectaclemakers.com.

Data Principles

Responsibility for compliance with Data Protection regulations and legislation rests with The Trustees.

Any information we gather will be for a specific purpose or purposes and the person whose data is being used will be informed of the purposes for which it may be used.

Data may need to be transferred to other parties for legal reasons, to enable the production of accounts and audit statements, to process donations made to the Charity by individuals or those acting on their behalf and to award grants or fulfil agreements for the benefit of the Charity and/or recipients of grants and their own beneficiaries. The Charity's administration is handled by staff of The Worshipful Company of Spectacle Makers and held on its systems. Such staff and the individual Trustees of the Charity will therefore have access to personal data provided to The Charity. Unless there has been specific consent, data shared with the Court of the Worshipful Company of Spectacle Makers will be in anonymised form.

Data will never be sold or passed to third parties for commercial marketing purposes.

Individuals who give a donation to the Charity are expected to want to hear about the use of their funds and receive occasional communications in writing, by email or by telephone about fundraising activities and events for the Charity. Such individuals have the right to ask at any time not to receive such information or to change the way in which communications are sent, by calling the Secretary on 020 7236 2932 or email to clerk@spectaclemakers.com.

Wherever possible, data held should remain as up to date and accurate as possible. Individuals who have provided their data to us will be asked to inform us if there is any change. If data does become outdated and/or the individual cannot be contacted, the data will be marked for archive or statistical use only.

The Charity will have particular concern for sensitive personal data ie that relating to race, religion, political opinion, health, any legal proceedings or action taken for committing a criminal offence and any data relating to children. No data will be accepted from individuals under the age of 16.

The Charity requires grantees to provide reports. Such reports may include photographs and personal data about individual beneficiaries, including children. The Charity will expect organisations to whom a grant has been given only to provide images and personal data with the specific consent of the individual concerned and will seek assurances that this has been done before publishing information which can be directly linked with a living individual.

Data will not be retained any longer than necessary.

Data will be processed using appropriate technological measures to ensure access can be restricted if required. This includes ensuring that data is password protected and its use is limited to certain individuals only. Data is held in the Cloud, using Microsoft systems which have been confirmed as compliant for the purposes of GDPR.

It is accepted that some data, including financial details such as bank account numbers, may be collected from donors by telephone or by word of mouth. Telephone lines are not recorded.

The Secretary will need to be aware of the location of any files, electronic or manual, which contain personal data relating to the Charity's work in order to satisfy any subject access requests or to confirm the circumstances of any data protection breach. All advisers, Trustees and volunteers working to raise funds for the Charity are aware of their responsibilities in this area.

Data Retention and Security

The Charity will only hold data for as long as necessary. Data relating to donations, including the name, address and postcode of individuals donors, may need to be held for up to six years for accounting and tax purposes. Any paper records will be destroyed by secure means.

Personal data relating to Trustees will be used for statutory purposes and may be maintained for a period of time based upon our assessment of reasonable business need. In the ordinary course, where Trustees receive no payment of expenses or other financial benefits from the Trust, this will not exceed three years from the date of resignation. Information such as name, date of birth, dates of appointment and resignation, residence and occupation during the period of appointment and the contribution of Trustees as recorded in minutes of meetings may be held in perpetuity, for archive purposes.

Any individual, including Trustees, may ask at any time for their data to be amended, updated or destroyed. Destruction of data will be subject to legal requirements.

Data Breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

There will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.

Whenever a security incident of this nature takes place, the Charity will, under the supervision of the Secretary and/or a Trustee, establish as quickly as possible whether a personal data breach has occurred and, if so, promptly take steps to address it and establish the likely risk to each individual concerned. The Secretary or, in his/her absence, a Trustee, will inform the Information Commissioner's Office if reporting of a significant data breach is required.

25 May 2018

The Worshipful Company of Spectacle Makers' Charity, Apothecaries' Hall, Black Friars Lane, London EC4V 6EL