

Friends of Freetown Privacy and Data Retention Policy – May 2018

There are three groups about whom Friends of Freetown collects information:

- Trustees
- Supporters
- Grant applicants and recipients

Trustees

- As a UK Charity, Friends of Freetown is required to hold the following information on its trustees and to share this information with the Charities Commission: name, address, telephone number, email address, date of birth
- The above information will be shared with all other trustees so that the board of trustees can communicate and operate effectively. It will also be shared with the trust's bank and with HMRC. If it becomes necessary to share this information with other parties, trustees will be notified in advance and, where appropriate, their permission sought.
- 8 Scafell Close, Cockermouth, Cumbria, CA13 9BP, 01900 824909, fof@friendsoffreetown.org.uk will be used as the official trust contact details and will be made available to the public. Trustee's full names will be published on the trust and Charities Commission websites but no other personal information will be made publicly available.
- When a trustee vacates their post, the above information will be retained by the chair as the trust is legally required to keep a record of all past and current trustees. Copies of a trustee's declaration of eligibility and resignation letter will also be retained by the chair. This information will be stored in paper form in the trust folder, held by the chair, and in electronic form in a password protected file.
- All official emails between trustees will be retained for the purposes of accountability and record keeping.

Supporters

- Donors, visitors to our website and members of the public will be invited to join the supporter mailing list. They will be invited to provide their email address and will be asked to explicitly give their agreement that their contact details be held for this purpose. They will be advised in writing of the expected frequency of communication. These details will be held electronically by the chair and website controller using the trust's password protected email system. Should a supporter wish to be removed from this list, they may contact the trust at fof@friendsoffreetown.org.uk. The chair or website controller will delete the supporter's details and reply to confirm that this has been done.
- Supporters who donate to Friends of Freetown will be invited to complete a gift aid declaration form. Supporters who complete this form will be asked to provide their name and address. This information will be held by the treasurer in paper form in the trust finance folder and in electronic form in password protected files. This information will be shared with HMRC and will be retained by the treasurer for the amount of time required by HMRC and then deleted/destroyed.
- All emails between trustees and supporters will be retained for the purposes of accountability and record keeping.
- It is possible to donate to Friends of Freetown by BACS transfer or via PayPal. In each case, Friends of Freetown is provided with statements from the relevant third party detailing the donation and basic information on the donor. This information is retained by Friends of Freetown solely for recordkeeping and accountability purposes. Information on BACS donations is held in paper form by the treasurer in the trust finance folder. Information on Paypal donations is held online in the trust's password protected PayPal account.

Grant applicants and recipients

- All grant applicants must provide sufficient information for an application form to be completed on their behalf. This will include:
 - o Contact information, project details and context, proposed use of funds
- On occasion the information provided in connection with a grant application may include sensitive information about an individual (for example, an individual child's school report, details of an individual's health condition and treatment plan).
- This information will be permanently retained by the trust for the purposes of accountability and record keeping. This will be clearly stated in the trust's grant giving policy which will be provided to all grant applicants. Grant applicants will be provided with a copy of the trust's grant giving policy upon application. The above information will be retained in paper form in the trust folder, held by the chair, and in electronic form in password protected files or official trust email accounts.
- All emails between trustees and grant applicants/recipients will be retained for the purposes of accountability and record keeping. This will be clearly stated in the trust's grant giving policy which will be provided to all grant applicants. Grant applicants will be provided with a copy of the trust's grant giving policy upon application.
- Photographs are often sent to the trust by grant recipients. These are retained by the trust for the purposes of accountability and record keeping. The inclusion of photographs in publicity materials greatly increase the effectiveness of fundraising and can also be useful if fundraising to meet the needs of a particular individual. Friends of Freetown will seek the permission from grant recipients before using photographs. If a photograph is to be used to fundraise for a particular individual, written permission will be sought from the individual (if 18 or over) or their parent/guardian (if under 18).

Emails

In order to safeguard information, the following email protocols for trustees have been agreed:

- No personal data (for example, photographs of individual children, health information that is not anonymised etc.) would be sent by email.
- When grant requests or information from grant recipients are forwarded to trustees, the original email address of the sender first will be removed.
- All official emails to grant recipients will be cc-d to at least two other trustees including the chair, vice-chair and treasurer.
- Emails retained by the trust will be stored in the chair's official trust email account.

Requests for information

Any individual wishing to view the personal information held about them by the trust should email fof@friendsoffreetown.org.uk or write to 8 Scafell Close, Cockermouth, Cumbria, CA13 9BP. These addresses are published on the trust website, the Charities Commission website and the Information Commissioner's Office website. Any such requests will be passed immediately to the chair who will ensure that the request is complied with within one month.