

Data Protection Policy

Xenia Women

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Definitions

Organisation	means Xenia Women
GDPR	means the General Data Protection Regulation.
Responsible Person	means Emma Wakeling
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Organisation.
Participant	means a person who has attended a Xenia session and has previously filled in a new participant form with which they have provided their name, contact details and other information.

1. Data protection principles

The Organisation 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 Organisation.
2. The Responsible Person shall take responsibility for the Organisation’s ongoing compliance with this policy.
3. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

1. To ensure its processing of data is lawful, fair and transparent, the Organisation shall maintain a Register of Systems.
2. The Register of Systems shall be reviewed annually.
3. Individuals have the right to access their personal data and any such requests made to the Organisation shall be dealt with in a timely manner.

4. Lawful purposes

1. All data processed by the Organisation must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
2. The Organisation shall note the appropriate lawful basis in the Register of Systems.
3. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
4. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Organisation’s systems.

5. Data minimisation

1. The Organisation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
2. The Organisation will store and process the participant’s name and the details of their preferred method of contact in order to send a weekly update on the next Xenia session and/ or to receive our newsletter, which the participant has consented to.
3. The Organisation will keep other information about the participant, if they have opted in to giving it, such as their nationality, languages spoken and how they heard about Xenia.
 1. Such information will be used to monitor the success of the Organisation’s work in its mission of facilitating integration and of improving English skills for Xenia and for funders who may want this information when deciding to award grants to the Organisation.
 2. Personal data that the Organisation collected before May 25th 2018 (when the new GDPR laws came into effect) which belongs to those individuals who chose not to re-opt in [1] to the Organisation processing their data, the

Organisation will continue to store information as stated in point 5.c.i. This information will be **anonymised**, i.e. their names and contact details will be deleted, and the information will be used purely for the purposes of monitoring and reporting to funders.

4. Every **two years**, the Organisation will undertake a **data audit** in order to ensure that they are only storing and processing the personal data that is necessary.

6. Accuracy

1. The Organisation 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.
3. The personal data the Organisation processes is provided by the individual themselves, therefore it will be reasonably assumed that the data provided is accurate
 1. As some of the individuals whose data the Organisation processes may struggle with English, the Organisation staff will offer assistance to those they believe may need it when providing personal data, to ensure that it is accurate.
 2. Currently, the way in which the Organisation uses personal data, it is not necessary for the data to be kept up to date.

7. Archiving / removal

1. To ensure that personal data is kept for no longer than necessary, the Organisation shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
2. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

1. The Organisation shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
2. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
3. When personal data is deleted this should be done safely such that the data is irrecoverable.
4. Appropriate back-up and disaster recovery solutions shall be in place.

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 Organisation shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

[1] During the month of May 2018, the Charity completed its strategy to comply with the new GDPR laws. During this period the Charity asked those whose data they already held, to opt-in to receiving communications from the Charity and to opt in to the Charity processing their data.