



Privacy – GDPR Policy

Policy Number:

Folkestone Nepalese Community
Registered Charity Number 1193139

TABLE OF CONTENTS

1. Introduction	Page 3
2. Our Obligation	Page 3
3. The Type of Information We Collect	Page 4
4. When and why we collect your data	Page 5
5. Data Sharing	Page 6
6. Security of Personal Data	Page 7
7. Retaining Data	Page 7
8. Subject Access Requests	Page 8

1. Introduction

The name of the data controller to which this Data Protection Policy refers is Folkestone Nepalese Community (FNC) (the Charity).

In processing personal data, the Charity complies with the Data Protection Act 2018 (DPA 2018) and General Data Protection Regulation 2018 (GDPR 2018) in relation to the retention and processing of personal data.

This Policy covers all Personal Data and Sensitive Personal Data that the Charity holds in either electronic or paper format or file system.

This policy is intended to ensure that personal information is dealt with properly and securely and in accordance with the UK and EU General Data Protection Regulation (the "GDPR") and other related legislation. It will apply to information regardless of the way it is used or recorded and applies for as long as the information is held.

2. Our obligation

The Charity, its representatives, staff and volunteers are committed to ensuring that anyone dealing with personal data shall be always mindful of the individual's rights under the law.

The Charity is committed to complying with the principles as set out below at all times and therefore will:

- inform individuals as to the purpose of collecting any information from them, as and when we ask for it;
- be responsible for checking the quality and accuracy of the information;
- regularly review the records held to ensure that information is not held longer than is necessary, and that it has been held in accordance with the Data Retention Policy
- ensure that when information is authorised for disposal it is done appropriately;
- ensure appropriate security measures to safeguard personal information whether it is held in paper files or on our computer system, and follow the relevant security policy requirements at all times;
- share personal information with others only when it is necessary and legally appropriate to do so;
- set out clear procedures for responding to requests for access to personal information known as subject access requests; and
- report any breaches of the GDPR as appropriate.

The six data protection principles as laid down in the GDPR are followed at all times:

- personal data shall be processed fairly, lawfully and in a transparent manner, and processing shall not be lawful unless one of the processing conditions can be met;
- personal data shall be collected for specific, explicit, and legitimate purposes, and shall not be further processed in a manner incompatible with those purposes;

- personal data shall be adequate, relevant, and limited to what is necessary for the purpose(s) for which it is being processed;
- personal data shall be accurate and, where necessary, kept up to date;
- personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose/those purposes; and
- personal data shall be processed in such a way that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3. The Type of Information We Collect

The Charity collects and uses certain types of personal information, with the consent of individuals, about the following categories but not limited to:

1. Board of Trustees, Executive Committee and Advisors;
2. full time and part time employees on a substantive or fixed-term contract and to associated individuals who are retained by the Charity, including agency staff, contractors and others employed under a contract of service;
3. volunteers of the Charity;
4. professional advisers and service providers including third party solicitors and auditors and providers of book-keeping, banking and insurance and management services, as well as other suppliers and 3rd party agencies;
5. Members (guests) and their families; and
6. fundraisers and supporters of the Charity.

Personal information we collect includes details such as name, date of birth, email address, postal address, telephone number and bank details, as well as information provided in any communications with us.

This information may have been given in any of the many ways in which we have interacted or communicated, through completed forms (including job or volunteering applications), events and activities attended, general communications or via email or through our website. We may also have collected this information in the course of our work and during work undertaken or through the provision of services and commission of surveys.

We will mainly use this information:

- to help us carry out the FNC's business, roles and responsibilities to our Members (clients) and their families, and help us make informed decisions in the governance of the Charity;
- to process donations or other payments and verify any financial transactions;
- to send communications which have been requested and that may be of interest, these may include information about campaigns, appeals or other fundraising activities and events;
- to carry out the FNC's obligations arising from any contracts entered into;

- to keep a record of supporter and volunteer relationships with the Charity;
- to administer the volunteering arrangement with our volunteers;
- to administer applications voluntarily provided by applicants for positions of employment or volunteering posts, either via our website or by any other method; and
- to manage contracts of employment and to protect the rights of our employees.

Sensitive Personal Information

Data Protection Law and the GDPR recognises that some categories of personal information are more sensitive.

We will only use this information:

- For the purposes of dealing with any enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass details to anyone else without explicit consent except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others.

Information about Children and Young People

We sometimes receive limited data about children if they decide to fundraise for the FNC, enter a competition, attend an event or school visit, or undertake work experience. Wherever possible, we will ask for consent from parents to collect information about children and young people under the age of 16. Their data is processed in line with this policy.

Informed consent will be sought should we request photographs or video footage in order to promote the Charity, our events or campaigns.

4. When What Why

When and why we collect your data

When	What	Why
When you sign up for FNC normal membership	Full name, Address, Email Address, Contact Number, Number of members in family	For official communication between the FNC and members. Number of family members to understand the population size we cater to.
When you sign up for FNC youth membership	Full name, Address, Email Address, Contact Number, Guardian/Parent Name	For FNC's official communication to the youth cohort for updates about opportunities for engagement and development.

When you sign up for FNC senior citizens membership	Full name, Address, Email Address, Contact Number, FNC Membership Number, Date of Birth, Spouse details and Army Number (if relevant)	For FNC's official communication to senior citizens. Additional identifier information is kept on record for the purpose of form filling assistance.
When you sign up for Community Led Housing (CLH) project's " <i>Housing Needs Survey Participation Form</i> " and/or complete the " <i>Housing Needs Survey</i> "	Full Name, Address, Email Address, Contact Number, Household income, Number of household member, Ethnicity, Gender	To send the survey form to individual at the correct email or postal address. To helps FNC establish the exact housing needs for the community.
When you make donations	Full Name, FNC Membership Number, Amount donated	To ensure we match our record about the correct person who made the donation.
When you sign up for any activities of the FNC and participate in relevant activities survey	Full Name, FNC Membership Number (your or your household), Email address, Contact Number	To notify about FNC activities, updates and information. To help FNC to monitor and review the activities of the community.
Wellbeing Survey	Full Name, FNC Membership, Mental health questions	For institutional funder when funding application are made to tackle loneliness.
Hall hire form	Full Name, Email address, Address, Contact Number, Billing details	To keep a record.

5. Data Sharing

The personal information the FNC collects will mainly be used by the FNC's staff (and volunteers) in order to provide support services to our Partners (clients) and their families.

The Charity does not sell or rent information to third parties, nor does it share information with third parties for marketing purposes.

We may pass information to the FNC's third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing support services on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service or if we are

required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

There are other third-parties for whom it may be necessary to provide personal information:

- professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and/or accounting services;
- HM Revenue & Customs, regulators and other authorities based in the UK which require reporting of processing activities in certain circumstances;
- partner agencies including council or other statutory bodies, including for the processing of DBS checks; and
- health professionals and other health service providers.

6. Security of personal data

The Charity has put in place appropriate measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to personal data is limited to those employees, volunteers, agents and third-party representatives who have a business need to access to it. They will only process your personal data on specific instructions and undertaking of their duties, roles and responsibilities, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify individuals and any applicable regulator of a breach where we are legally required to do so.

7. Retaining data

We will only retain personal data for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Data sources / document	Retention period
Committee minutes and decision	At least 2 years as hard copy and permanently as digital copy.
Bookkeeping records, invoices etc.	6 years
Members donations, Quarterly and Annual accounts	At least 10 years or permanently
Records of services and contracts	10 years
Room and Hall Hire booking details	6 years from the date of use
Correspondence	It will not be kept longer than intended purpose
Health and Safety records	3 years
Accident Reports	3 years
Safeguarding or child attendance records (there will be a difference between simple registers, accident records, safeguarding	For until the charity is running or erasure is requested.

concerns and investigations)	
CLH Housing Needs Participation and Survey forms	Until the completion of the project
Activities review survey	3 years
Wellbeing survey	TBC

8. Subject access requests

Anyone requesting to see any personal information held by the Charity is making a subject access request.

- *Access to personal information:* individuals have the right to request access to a copy of the personal information that we hold, along with information on what personal information we use, why we use it, who we share it with and how long we keep it. Request for access can be made free of charge. Requests for access must be made in writing and evidence of identity must be provided.
- *Right to object:* individuals can object to the FNC regarding the processing of personal information where we are relying on a legitimate interest (or those of a third party). There is also, the right to object where we are processing your personal information for direct marketing purposes.
- *Consent:* if consent has been given to use personal information (for example, for marketing), it can be withdrawn at any time.
- *Rectification:* individuals can request to change or complete any inaccurate or incomplete personal information held.
- *Erasure:* individuals can request the FNC to delete personal information where it is no longer necessary for us to use it, or if consent has been withdrawn, or where we have no lawful basis for keeping it.
- *Portability:* individuals can request to provide some or any of the personal information held in a structured, commonly used, electronic form, so it can be easily transferred.
- *Restriction:* individuals can request to restrict the personal information we use where a request has been made for it to be erased or where objection has been made as to our use of it.

Please note, some of these rights only apply in certain circumstances.

Contact details:

Data Protection Officer
Folkestone Nepalese Community Centre
Baker Road
Folkestone
Kent
CT19 4NN

The data protection supervisory authority, the Information Commissioner's Office, can be contacted: <https://ico.org.uk>