



ROYAL NATIONAL CHILDREN'S SPRINGBOARD FOUNDATION

DATA PROTECTION POLICY

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SECTION 1 – BACKGROUND INFORMATION

1 Introduction

- 1.1 Royal National Children’s Springboard Foundation (**RNCSF**) is a company limited by guarantee which is also a charity registered with the Charity Commission for England and Wales.
- 1.2 RNCSF is a national charity which secures educational bursaries for disadvantaged young people through a mechanism of direct referrals and working in partnership with local organisations and schools.
- 1.3 As is necessary for our activities RNCSF is provided, from various sources, with personal information about of a number of individuals. RNCSF considers protection, security and lawful treatment of this personal information as essential to the continuing success of RNCSF.
- 1.4 This Data Protection Policy is in compliance with the overall aims of RNCSF and the legislation in the United Kingdom and the obligations of RNCSF to the schools, partners and other organisations and people with which it works.
- 1.5 For the purposes of interpretation of this policy:
 - 1.5.1 words denoting the singular include the plural and vice versa;
 - 1.5.2 words denoting any gender include all genders;
 - 1.5.3 words denoting persons include firms and corporations and vice versa.

2 The General Data Protection Regulation and the Data Protection Act 2018

- 2.1 The collection, use and ultimately the destruction of Personal Data is governed by the UK General Data Protection Regulation (the UK **GDPR**) and the Data Protection Act 2018 (the **DPA**). Together the UK GDPR and the DPA and any regulations made under them are referred to as the Data Protection Legislation (the **DPL**). The DPL is not prescriptive, it does not specify how Personal Data will be processed; it simply sets out a framework which those controlling Personal Data must use to establish how to undertake their own Processing.
- 2.2 RNCSF has considered the framework established by the DPL and interpreted how it will achieve compliance in this Policy.
- 2.3 It is important to note that the DPL only relates to Personal Data (as defined by the UK GDPR – see Paragraph 3.2 below). Therefore, information which does not constitute Personal Data is not covered by the rules set out in this Policy.
- 2.4 The DPL can be split into three sections requiring compliance:
 - 2.4.1 payment of the annual Data Processing Fee in respect of Personal Data to the Information Commissioners Office (ICO);

- 2.4.2 Processing Personal Data within the principles of data protection; and
 - 2.4.3 compliance with the general requirements of the DPL.
- 2.5 The UK GDPR was introduced as Regulation of the European Union and has direct effect throughout the EU. The DPL was introduced to manage the data protection regime in the UK and supports the UK GDPR, provides derogations from the GDPR where permitted and covers elements of data Processing which were left to the UK and other EU member states to manage directly. Note that there are certain freedoms to transfer data within the European Union which do not apply to countries outside of the European Union.

3 Definitions

- 3.1 A great deal of terminology is used in relation to data protection. We have set out in this section the definitions of the key terms used in this Policy.

3.2 Personal Data

- 3.2.1 There are two subsets of Personal Data – these are Personal Data and Special Categories of Personal Data.
- 3.2.2 Personal data means any information relating to an identified or identifiable natural person (a 'Data Subject').
- 3.2.3 An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 3.2.4 Special Categories of Personal Data means Personal Data revealing:
 - 3.2.4.1 racial or ethnic origin;
 - 3.2.4.2 political opinions;
 - 3.2.4.3 religious or philosophical beliefs, or trade union membership;
 - 3.2.4.4 the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person;
 - 3.2.4.5 data concerning health or data concerning a natural person's sex life or sexual orientation; and
 - 3.2.4.6 the racial or ethnic origin of the Data Subject.
- 3.2.5 Please note that special provisions now apply to information on Criminal Convictions and Processing of Personal Data relating to criminal convictions and offences or related security measures may only be carried out:

3.2.5.1 under the control of an official authority (e.g. a government department); or

3.2.5.2 when the Processing is authorised by the DPA which provides for appropriate safeguards for the rights and freedoms of Data Subjects – where RNCSF is required to process such criminal conviction data it is permitted by the DPA.

3.3 Data Controller

3.3.1 A Data Controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. Where the purposes and means of such Processing are determined by law, the controller or the specific criteria for its nomination may be provided for by UK domestic law .

3.3.2 If two (or more) organisations jointly hold Personal Data:

3.3.2.1 and can only use such data for purposes agreed by them both then they will be joint Data Controllers;

3.3.2.2 with the data being held by each independently meaning that each organisation can seek to process the Personal Data as they wish then the organisations are Data Controllers in common.

3.4 Data Subject

A Data Subject is the individual who is the subject of Personal Data held by a Data Controller.

3.5 Data Processor

A Data Processor is a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller.

3.6 Processing

3.6.1 For the purposes of the DPL “Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3.6.2 This is a very wide definition and it is unlikely that any activity in respect of Personal Data will not be Processing.

3.7 General Information on Definitions

3.7.1 Should terms be used with which you are not familiar or are not included in this Policy the first place to seek a definition is in an up-to-date copy of the DPL. Please note that definitions are used throughout the DPL and sometimes terms are not easy to locate.

3.7.2 Please note that some terms in ordinary use do have specific meanings under the DPL.

3.7.3 If you still require assistance after considering the definitions in the DPL, please

contact the Chief Executive Officer (the **CEO**), to clarify any terms in relation to data protection.

4 The Principles of Data Protection

- 4.1 As part of RNCSF's commitment to good practice in Personal Data management RNCSF will in all its dealings with Personal Data ensure that the information is handled in accordance with the data protection principles (the **Principles**).
- 4.2 The Principles can be found in Article 5 of the GDPR and are that Personal Data shall be:
- 4.2.1 processed lawfully, fairly and in a transparent manner in relation to the Data Subject ('lawfulness, fairness and transparency');
 - 4.2.2 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, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');
 - 4.2.3 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
 - 4.2.4 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 ('accuracy');
 - 4.2.5 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 in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the Data Subject ('storage limitation');
 - 4.2.6 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 ('integrity and confidentiality').
- 4.3 This Policy sets out how RNCSF will ensure that it undertakes the Processing of Personal Data in accordance with the Principles.

SECTION 2 – APPLICATION OF THE LEGISLATION

1 Compliance

- 1.1 RNCSF will comply with its obligations under the DPL by ensuring that all Personal Data, including Special Categories of Personal Data will be processed in compliance with the DPL.
- 1.2 RNCSF also reviews Codes of Practice which may be issued by the Information Commissioner and seeks to ensure that these are followed as far as possible within this Policy.
- 1.3 RNCSF notes that its legal requirement is to comply with the requirements of the DPL and that the Codes of Practice sometimes seek to go beyond the requirements of the DPL. When requirements set out in the Codes of Practice are beyond the requirements of the DPL, but are feasible for RNCSF, RNCSF will seek to achieve this higher level of compliance – a failure to achieve such compliance will not be a breach of this Policy.
- 1.4 The DPL is different to the previous legislation in that it applies to Data Controllers and to Data Processors. However, in order to bind Data Processors to the Processing terms required by the Data Controller, the Data Controller will still need to enter into a Data Processing Contract to ensure that the Data Processor undertakes Processing as required by the Data Controller. A Data Controller may still be responsible for a breach of the DPL by a Data Processor.
- 1.5 It is noted that RNCSF, a company limited by guarantee, is the Data Controller in respect of Personal Data processed in the name of RNCSF and that the Trustees will have ultimate responsibility for all Processing of Personal Data. Employees are agents of RNCSF and not Data Controllers or Data Processors in their own right.

2 Registration

- 2.1 It is a requirement for all organisations which control how Personal Data are Processed to pay an annual fee to the Information Commissioner because they undertake Processing of Personal Data. This is akin to registration.
- 2.2 RNCSF has notified the Information Commissioner's Office of its data Processing activities. Our registration number is Z8686247. Each separate company controlling how Personal Data are processed are required to notify the Information Commissioner about their data Processing activities. Therefore, if RNCSF does ever develop a trading company then it will need to be separately registered (a **Trading Company**).
- 2.3 A failure to pay the annual fee (currently £40 for charities) will result in an infringement of DPL. If the annual fee and the fine are not paid, additional enforcement can be taken against RNCSF and the Trading Company.
- 2.4 A copy of the RNCSF registration is attached as Schedule 10.
- 2.5 RNCSF is required to renew its notification each year.
- 2.6 The Financial Controller is responsible for paying the fee renewal each year.
- 2.7 The registration and payment must be made before 4 August each year.

- 2.8 Currently no other companies controlled by RNCSF require registration with the Information Commissioner for the purposes of Processing Personal Data. Should any connected companies require a notification, they shall be added to the above section.
- 2.9 If a Trading Company is formed, it shall ensure that it follows the notification procedures set out in this Policy in the same way that they are followed in respect of RNCSF.

3 General

3.1 Data Protection Officer

- 3.1.1 RNCSF is not required to appoint a data protection officer as RNCSF is not large enough to meet the threshold. However, RNCSF does have to appoint a person to have responsibility for this policy.
- 3.1.2 As data protection compliance is a charity wide issue, the CEO shall have responsibility for this policy and shall appoint from time to time team members to assist with compliance.

3.2 Data Controllers and Data Processors

- 3.2.1 RNCSF will be the Data Controller in respect of the majority of individuals/Data Subjects whose Personal Data are Processed by RNCSF.
- 3.2.2 Where, in the future, Personal Data is also required by a Trading Company e.g. in relation to fundraising events, RNCSF and the Trading Company should be Data Controllers in Common but independent of one another. Where a Trading Company is undertaking Processing on behalf of RNCSF, a Trading Company will be the Data Processor on behalf of RNCSF as the Data Controller.
- 3.2.3 Therefore, RNCSF will have responsibility to ensure that these Personal Data are Processed in accordance with this Policy, which is designed to operate within the framework set out in the DPL.
- 3.2.4 If RNCSF receives services from a third party and to provide such services, the third party requires either access to or a copy of some or all the Personal Data held by RNCSF, the third party, once it receives such Personal Data, will be a Data Processor.
- 3.2.5 RNCSF must ensure that it enters into a Data Processing agreement with all Data Processors to ensure that the Personal Data controlled by RNCSF are protected and that the Data Processor:
- 3.2.5.1 can only undertake Processing authorised by RNCSF; and
- 3.2.5.2 RNCSF ensures that security requirements for the Personal Data are specified in the contract so that they are in written form.
- 3.2.6 RNCSF may be required to, or may wish to, transfer Personal Data to a third party for that third party's own purposes. A transfer can only take place if permitted by the Principles. If a transfer takes place, the third party receiving the Personal Data is not a Data Processor. The third party is a Data Controller in his own right.

- 3.2.7 The third party is responsible for ensuring that it Processes the Personal Data in accordance with the DPL. However, RNCSF will usually only transfer Personal Data under a Data Sharing Agreement. Such an agreement will set out the purposes for which the Personal Data have been transferred.
- 3.2.8 When a transfer is required for statutory purposes a transfer agreement will not usually be required. For example, the provision of names and addresses of victims of an accident can be transferred to a regulator without the need for an agreement.
- 3.2.9 RNCSF may also be a Data Processor, Processing Personal Data on behalf of a third party. For example, RNCSF may Process the payroll of a related charity or undertake Processing on behalf of a third-party charity or a school that a supported pupil attends. RNCSF's data Processing obligations are set out in Paragraph 8 below.

3.3 Employee Responsibilities

- 3.3.1 Employees are not and cannot be Data Processors as defined by the DPL. However, they are usually responsible for undertaking RNCSF's Processing. Employees Process the Personal Data as agents of RNCSF. The activities of the employees are the activities of RNCSF.
- 3.3.2 RNCSF shall ensure that Employees agree to undertake all Processing of Personal Data by RNCSF under this Policy. Such agreement can be undertaken through the RNCSF employment contract or by separate agreement.
- 3.3.3 RNCSF shall ensure that all employees are trained to understand their responsibilities under the DPL. All new employees will be trained on data protection on joining and each employee will be provided with refresher data protection training every twelve to eighteen months.

3.4 Volunteers

- 3.4.1 Volunteers are not Data Processors as defined by the DPL. However, they are responsible for undertaking RNCSF's Processing. Volunteers usually Process the Personal Data as agents of RNCSF. The activities of the Volunteers are usually activities of RNCSF. When a Volunteer operates outside of this Policy, they may be deemed a data controller and therefore they may be responsible for such processing or liability for an infringement of DPL. It is therefore essential that they operate within this Policy.
- 3.4.2 RNCSF shall seek to ensure that all Volunteers agree to undertake all Processing of Personal Data by RNCSF under this Policy

3.5 Consultants

- 3.5.1 Consultants are rarely agents of RNCSF and will be either data Controllers or Data Processors. There should be data Processing clauses in the consultancy agreement. If not, a separate dataProcessing or data sharing agreement may be required.

3.6 Contracts

- 3.6.1 RNCSF is a charity with large impact and a great deal of Personal Data and will where necessary use equipment, contractors and other agencies to assist.
- 3.6.2 Where this is the case, RNCSF shall ensure that it has a written contract in place. Further, it should ensure that if Personal Data are transferred to the third party that there is a data Processing clause in each such contract.
- 3.6.3 If there is no data Processing clause in a contract and Personal Data are Processed, a data Processing agreement relating to the particular services should be entered into in relation to the data Processing and particularly the security of the Personal Data.
- 3.6.4 When RNCSF is contracting with third parties and such a contract includes the Processing of Personal Data controlled by RNCSF, such third parties should be notified of the purposes for which RNCSF Processes Personal Data – this is to ensure that they do not engage in Processing which is outside that which is permitted by RNCSF – this should be both covered in the contract and potentially by providing a copy of the relevant Article 13 statements.
- 3.6.5 Following the implementation of this Policy, each contract shall be reviewed for the purposes of data protection compliance. This review shall be undertaken by the team members responsible for the contracts and shall be coordinated by the CEO.
- 3.6.6 The CEO shall be responsible for the approval of all contracts and prior to approval shall ensure that:
- 3.6.6.1 data protection provisions are included in all contracts with third party contractors; and
 - 3.6.6.2 the obligations of any non-employee given access to Personal Data of which RNCSF is the Data Controller are explained prior to them being granted access to such Personal Data.

3.7 Training of Staff and Volunteers

- 3.7.1 All staff employed by RNCSF and any temporary and/or agency employees, who process Personal Data or Special Categories of Personal Data will receive data protection training appropriate to their position. This training shall be undertaken as part of all induction programmes.
- 3.7.2 All Staff employed by RNCSF and all Volunteers working with RNCSF shall be aware that any misuse of Personal Data will be a disciplinary offence and subject to the terms and conditions of the charity's disciplinary procedure, may result in dismissal from RNCSF's employment or removal as a Volunteer. All Employees and Volunteers are warned that misuse of Personal Data may be a criminal offence.

- 3.7.3 Any Agency staff, casual workers, contractors and consultants who are undertaking duties for RNCSF will be aware that any misuse of Personal Data will result in notification to the relevant employment agency and their duties may be terminated by RNCSF.

4 Rights of the Data Subject

4.1 Under the GDPR Data Subjects are provided with specific rights, these are:

- 4.1.1 the right to obtain from RNCSF confirmation as to whether or not their Personal Data are being Processed by RNCSF and, if such Personal data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. This is expanded further in Section 3 – Subject Access Requests.
- 4.1.2 the right to rectification of any inaccurate Personal Data which RNCSF Processes about a Data Subject, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, the Data Subject will need to provide the correct information to the Charity along with an explanation of why the Data Subject believes the information is inaccurate or incomplete may also be of requested provided that the request is reasonable and would be of assistance to RNCSF.
- 4.1.3 when the grounds set out in Article 17(1) of the GDPR, apply, the Data Subject will be entitled to have RNCSF erase certain Personal Data relating to them. In order for this to be actioned, this will be on an application from the Data Subject setting out the grounds under which the Data Subject would like the Personal Data RNCSF holds about the Data Subject erased and the Personal Data which should be erased. RNCSF will then assess the application and erase Personal Data falling within the request – please note that marketing or inaccurate data may be erased, it is unlikely that data such as the Data Subject receiving funding via RNCSF would fall within Article 17(1).
- 4.1.4 when certain grounds set out in Article 12(1) of the GDPR, apply, the Data Subject will be entitled to have RNCSF restrict the Processing of certain Personal Data relating to the Data Subject. This requires an application from the Data Subject to RNCSF setting out the grounds under which the Data Subject would like the Personal Data the Charity holds about them restricted and the Personal Data that falls within the request.
- 4.1.5 The Data Subject has a right to request that RNCSF transfer their Personal Data to a third party. This will usually apply when there is an underlying transfer of a charity or business activity. For example, if a grant was transferred from RNCSF to a competing provider, the Data Subject could request that all Personal Data transfer under this provision. This right will not generally apply to RNCSF.

5 Offences under the DPA

5.1 The following offences can be committed under the DPA:

- 5.1.1 Section 119: Obstructing the Commissioner in inspecting personal data to discharge an international obligation;
- 5.1.2 Section 144: False statement made in response to an information notice;
- 5.1.3 Section 148: Destroying or falsifying information and documents etc.;
- 5.1.4 Section 170: Unlawful obtaining etc. of personal data;
- 5.1.5 Section 171: Re-identification of de-identified personal data;
- 5.1.6 Section 173: Alteration etc. of personal data to prevent disclosure to Data Subject;
- 5.1.7 Section 184: Prohibition of requirement to produce relevant records;
- 5.1.8 Schedule 15, Paragraph 15. Intentionally Obstructing Powers of Entry and Inspection.

5.2 Offences are only punishable by a fine, but the fine can be applied to any person. Therefore, employees, volunteers or trustees that commit one of the above offences may be personally liable for a fine in addition to any fine applied to RNCSF.

5.3 For completeness there are some additional offences that can be committed, however, they are usually committed by those working for regulators and other authorities and have not been included above.

6 Possible Breaches of the DPL

6.1 Introduction

- 6.1.1 Whilst RNCSF undertakes all necessary and reasonable precautions to ensure that there are no breaches of the DPL, breaches may sometimes occur. Employees (including any temporary or agency staff that may be working on RNCSF premises) may on occasion become aware of possible breaches and if this is the case must as soon as is practical, raise this possibility with their line manager.
- 6.1.2 Any line manager informed of a potential data loss shall immediately inform the CEO of RNCSF.
- 6.1.3 The CEO shall commence an investigation into each potential data loss reported in accordance with Paragraph 7.1 below.
- 6.1.4 **Note that certain breaches must be reported to the ICO within 72 hours of RNCSF becoming aware of the breach so swift action is vital.**

6.2 Social Networking

- 6.2.1 The use of social networking is an evolving technology and RNCSF understands the important business applications that may be result through the use of social networking applications such as Twitter, Facebook, My Space, Bebo and LinkedIn.
- 6.2.2 However, using these websites may also give rise to risks in that Personal Data of contacts, clients, customers and suppliers may be released through the use of such social networking applications.
- 6.2.3 Where an Employee becomes aware of use of social networking in breach of the DPL, that Employee shall notify his immediate line manager. The line manager will report this breach to the Office Manager who has overall responsibility for data security matters.
- 6.2.4 Any misuse of Personal Data by an Employee through social networking shall be treated as a disciplinary matter by RNCSF.

6.3 Data Loss

- 6.3.1 Bulk downloads of data by RNCSF Employees are restricted.
- 6.3.2 Permission for bulk downloading of information will only be given by the CEO or in his absence the Deputy Chief Executive (the **Deputy CEO**). A record of any bulk download shall be kept by the CEO to enable location of the data at a later date. Downloading data in bulk gives RNCSF a high risk of exposure to data loss and should be avoided unless it is 'business critical'.
- 6.3.3 This shall include the transfer of Personal Data to any portable media such as a disc or data stick.
- 6.3.4 If permission is granted for Personal Data to be transferred to any disc or data stick, that information shall be encrypted in case of loss of the media on which it is held.
- 6.3.5 All computing systems are to be reviewed to restrict access to downloading Personal Data to portable media such as disc and data sticks.
- 6.3.6 Where a laptop is provided by RNCSF for use by the employee, the employee shall not use unrestricted wireless networks. When logging onto RNCSF's network and accessing any Personal Data the employee shall ensure that they are in an appropriate location. For instance, an employee shall not access Personal Data in a public place such as "Starbucks" or on a train using the provided Wi-Fi, an employee should use a hotspot or a VPN.
- 6.3.7 Any laptop that contains Personal Data on the hard drive will be appropriately secure. For example, password protected with all information encrypted. As a matter of policy RNCSF shall not permit Personal Data within its control to be accessed on a computer which uses an operating system with less security than Microsoft Windows 10 Pro with Bitlocker activated.

- 6.3.8 Use or download of any Personal Data to portable media will be recorded in a media log and will only be accessed in accordance with this Policy.
 - 6.3.9 Discs and other media containing Personal Data shall not be sent through the post. Any such transfer shall be undertaken through appropriate means, such as a personal courier.
 - 6.3.10 Electronic files containing Personal Data shall not be sent by email unless they are properly encrypted and secure against unauthorised access.
 - 6.3.11 RNCSF shall, whenever possible, undertake transfers of Personal Data through secure file transfer protocol websites or secure transfer facilities of similar or greater security.
 - 6.3.12 It is noted that not all RNCSF Employees and Volunteers have access to the RNCSF central network. This does mean that some Personal Data are stored on standalone computers and are only connected through RNCSF email accounts. RNCSF shall ensure that all such computers are loaded with anti-virus software and encryption software to ensure that such Personal Data cannot be unlawfully accessed.
- 6.4 Following a data breach RNCSF may also be required to make a Serious Incident Report on the Data Loss to the Charity Commission for England and Wales. This is in addition to the report to the ICO. The ICO reports the number of charities making report to the ICO to the Charity Commission and in some cases the Charity Commission follows up. It is usually advisable to complete the process with the ICO prior to notifying the Charity Commission. However, if the data breach is likely to be made public or if it is necessary to inform a large number of people about the data breach, the report to the Charity Commission will need to be made at the same time as the report to the ICO.

7 Investigations and Resulting Actions

7.1 Investigations

- 7.1.1 RNCSF will investigate any reported loss of data in accordance with this Policy. Upon notification the CEO shall speak to either a line manager or the person making the report to assess whether there has been a breach of the data protection principles. This will be undertaken on the same day as the initial report.
- 7.1.2 The CEO will convene a meeting with the line manager and individual who notified the line manager about the possible breach no later than 24 hours following the initial report.
- 7.1.3 The CEO will inform the person responsible for public/press relations about any such data loss. The person responsible for public/press relations will ensure that press lines in relation to the possible data loss are prepared and that the Chief Executive is fully briefed and able to make a statement in case the possible data loss is made (or needs to be made) public.

- 7.1.4 A file will be opened to enable the investigation material to remain accessible. This file will be held under the control of the CEO and available to the Trustees upon request.
- 7.1.5 The CEO will conduct further meetings and liaise with the necessary people at RNCSF to help to identify whether a breach of any data protection principle has occurred. This will happen within 36 hours of the initial report of the breach. If no breach has occurred the file will be closed and destroyed after being kept for information purposes. Please see Retention of Records – Schedule 17 for further information.
- 7.1.6 The CEO will report regularly to the Chairperson in respect of the status of the investigation. The meaning of regularly will depend on the nature of the loss but in extreme cases may mean on an hourly basis and in respect of a minor loss may mean weekly.
- 7.1.7 Should any of the people specified as taking action in this Policy not be available then their deputies shall undertake the required actions. Should a deputy not be available the Chief Executive shall be informed of any potential data loss and shall appoint a person to undertake the required investigation and actions.
- 7.1.8 Please note that it is possible that data losses can be key news and can easily result as the lead story on the news. Action should not be delayed as it is possible that a data loss can run on the news overnight or on the early news programmes e.g. Today on Radio 4. Therefore, possible data losses should be reported immediately.
- 7.1.9 Where a breach has been identified and reported to the Chief Executive, the Chief Executive shall seek immediate legal advice. RNCSF has a panel of lawyers, those dealing with data breaches are:
- 7.1.9.1 McCarthy Denning – data loss is an important issue and the partner responsible for data protection can be contacted twenty-four hours per day using the firm’s emergency numbers – the contact details can be found through the CEO, the Deputy CEO or Jayne Adams; and
- 7.1.9.2 any other legal firm appointed by the trustees from time to time whose details are included in this Policy.
- 7.2 Resulting Actions
- 7.2.1 There are several possible actions which RNCSF can take depending on the issues and the severity of the breach. No action should be taken without legal advice.
- 7.2.2 Possible actions include:

- 7.2.2.1 reporting the breach to the Information Commissioner's Office (please note that this is a legal requirement in certain circumstances and a report must be made within 72 hours of RNCSF becoming aware of the breach and an immediate assessment is required on reporting
 - in summary When a Personal Data breach has occurred, RNCSF needs to establish the likelihood and severity of the resulting risk to people's rights and freedoms. If it's likely that there will be a risk, then RNCSF must notify the ICO; if it's unlikely then RNCSF does not have to report it. However, if RNCSF decides RNCSF does not need to report the breach, RNCSF needs to be able to justify this decision, so the decision should be documented – the decision will be taken by the CEO or the Deputy CEO in his absence);
 - 7.2.2.2 making a public statement;
 - 7.2.2.3 preparing a notification to each person whose data may have been lost, informing them what has been lost and any precautions that should be taken (such a notification is a requirement without undue delay if the breach is likely to result in a high risk to the rights and freedoms of natural persons);
 - 7.2.2.4 reporting the data loss to the banks and other service providers so fraud protection measures can be activated; and
 - 7.2.2.5 reporting matters to the police if a deliberate theft has occurred.
- 7.2.3 Other actions will need to be taken to ensure that the breach does not occur again:
- 7.2.3.1 remedial action to ensure that a breach is not repeated for example fixing any breach resulting from a computer failure; and
 - 7.2.3.2 human resource consideration, this is to ensure that any employment issues are immediately and correctly dealt with e.g. the suspension of the responsible employee.
- 7.3 Reporting
- 7.3.1 The only circumstances where a breach is not reportable to the ICO within 72 hours of RNCSF becoming aware of the breach is when the breach is unlikely to result in a risk to the rights and freedoms of natural persons.
 - 7.3.2 If a breach is identified by a Data Processor, the Data Processor must immediately make a report to the Data Controller. RNCSF shall ensure that there is a reporting obligation in all contracts with Data Processors.

- 7.3.3 The report to the ICO shall:
- 7.3.3.1 describe the nature of the Personal Data breach including where possible, the categories and approximate number of Data Subjects concerned and the categories and approximate number of Personal Data records concerned;
 - 7.3.3.2 communicate the name and contact details of the data protection officer or other contact point where more information can be obtained;
 - 7.3.3.3 describe the likely consequences of the Personal Data breach;
 - 7.3.3.4 describe the measures taken or proposed to be taken by the controller to address the Personal Data breach, including, where appropriate, measures to mitigate its possible adverse effects.
- 7.3.4 Where some of the information required in a notification to the ICO is not available it may be provided in phases to avoid delay and ensure the initial report is made within 72 hours of RNCSF becoming aware of the breach.
- 7.3.5 RNCSF shall document all breaches in a central file and make the file available to the ICO on request.

8 Data Processing

- 8.1 At the current time RNCSF undertakes limited Data Processing for other organisations. However, there is considerable sharing of information in relation to supported pupils. A distinction has been drawn between data processing undertaken for others and data sharing where there is a complex arrangement of transfers and processing, more of which is set out in the data sharing section below (PART 4, Paragraph 5 below).
- 8.2 Such Data Processing is usually undertaken in relation to schools at which supported beneficiaries are pupils and in respect of third-party organisations and is undertaken in accordance with the contract between RNCSF and the school and, as applicable, the partner organisation.
- 8.3 Any Personal Data of which RNCSF is a Data Processor shall be marked as such and stored separately from the Personal Data of which RNCSF is the Data Controller.
- 8.4 In most settings, RNCSF, the participating school and any third party will be considered to be Data Controllers separate from one another and as such, each will establish its own purposes for processing the data and as such processing will be governed by that Data Controller's policy.
- 8.5 In the event that RNCSF is a data processor and should the agreement be terminated or should RNCSF be informed by the third party that RNCSF is no longer permitted to Process such Personal Data, RNCSF shall immediately identify the Personal Data which is being Processed under such Processing agreement and at the direction of the Data Controller return such Personal Data to the Data Controller or destroy such Personal Data and all copies in accordance with the instructions of the Data Controller.
- 8.6 RNCSF shall ensure that it only undertakes Data Processing in accordance with the DPL and in particular

Article 28 of the GDPR: and this Policy

- 8.6.1 the Notifications of the Data Controllers of the Personal Data processed by RNCSF;
- 8.6.2 any written agreement between RNCSF and the Data Controller;
- 8.6.3 the Article 13 notice provided to the Data Subject; and
- 8.6.4 any written instructions from the Data Controller.

9 Closed Circuit Television (CCTV)

- 9.1 The monitoring, recording, holding and Processing of images of identifiable individuals captured by CCTV systems constitutes the Processing of Personal Data. Where RNCSF engages in any recording of images, the data recorded shall be handled in accordance with this Policy.
- 9.2 The CCTV system may be employed by RNCSF for the following purposes:
 - 9.2.1 the protection of property and ensuring the security and safety of those using RNCSF's properties and services;
 - 9.2.2 to assist in the prevention and detection of criminal activity which may occur on RNCSF's property;
 - 9.2.3 to assist with the prosecution of offenders and suspected offenders;
 - 9.2.4 to assist with civil actions and the defence of the same;
 - 9.2.5 to assist with the monitoring of RNCSF's services; and
 - 9.2.6 to assist in lessening the risk to staff and service users of criminal acts being perpetrated against them.
- 9.3 The system may only be used for the purposes specified in Paragraph 9.2 above and not for any other purposes. It is intended that the operation of the CCTV system will help ensure that a safe environment is provided for both employees, volunteers and members of the public using RNCSF's facilities or otherwise under the protection of RNCSF.
- 9.4 RNCSF Shall keep a record of all CCTV systems in operation and these records categorise the following:
 - 9.4.1 the type of CCTV equipment that is installed; and
 - 9.4.2 the location of the CCTV equipment.
- 9.5 Any CCTV equipment that is in use by RNCSF will be sited so that CCTV equipment records information that is necessary for the purposes that RNCSF have identified. All areas covered by CCTV will have clear visible and legible signs. These signs will indicate:
 - 9.5.1 RNCSF's name;
 - 9.5.2 the purpose of the Processing; and
 - 9.5.3 contact details of RNCSF.

9.6 The Retention periods for CCTV are outlined in Retention of Records – Schedule 17

SECTION 3 – SUBJECT ACCESS REQUEST

1 Requests for Personal data

- 1.1 An individual is entitled under Article 15 of the GDPR to seek a Subject Access Request (**SAR**). A SAR may be sought by any person whose Personal Data is processed by RNCSF. RNCSF handles all SAR's in accordance with the DPL.
- 1.2 It should be noted that an individual is not entitled to the Personal Data or information of another individual, unless the individual is a child or has given consent or can be taken to have dispensed with their consent. For example, if an individual is seeking information relating to a complaint that he had made through the RNCSF complaints system about a member of staff. This would normally not be disclosed even if the person who requests the information was the complainant.
- 1.3 In all cases details here, such requests to access personal data will be handled in accordance with the ICO's guidance.

2 Valid Requests

- 2.1 A request under Article 15 of the GDPR is valid if it is made in any form e.g. writing, verbally or by social media.
- 2.2 If it is unclear as to the identity of the individual requesting Personal Data, for example the return address is different from the address held on file or no identifying information is included in the request, it will be necessary for RNCSF to request information to enable RNCSF to identify the individual, this can include a copy of the photograph page of their passport and a copy of a utility bill or other reasonable means of identification.
- 2.3 It is very important that RNCSF does not provide Personal Data to a third party in the guise of a SAR which would be a breach which is punishable with a fine. Therefore, if you are unsure about the identity of the person ensure that you have evidence of identity which is only available to the Data Subject e.g. a copy of their passport. Any request for further identification must be proportionate.

3 Managing Requests

- 3.1 All requests will be sent internally to the CEO, who will manage the overall Data Subject access request process.
- 3.2 The CEO shall circulate requests to the relevant people who may hold the Personal Data requested.
- 3.3 The CEO will decide whether a particular individual will draft a response to the request.
- 3.4 Responding
- 3.4.1 RNCSF will respond to all SAR's received within one month of receiving a valid request.

- 3.4.2 The one-month period is set out in the DPL.
- 3.4.3 Failure to respond within the one-month response period is a breach of the DPL.
- 3.4.4 RNCSF shall use a standard response template which is provided in Schedule 16 to this Policy.
- 3.4.5 Please note that on occasion it may not be possible to respond within this time frame. RNCSF will seek advice from appropriate officers within the charity and may also seek legal advice in this situation. RNCSF will notify the individual promptly and keep the individual updated with information as to the ongoing status of their request.
- 3.4.6 RNCSF will not respond to a 'third party' SAR. For example, if a solicitor writes a subject access request on behalf of an individual, RNCSF must ensure that it has the consent of the Data Subject himself. Further, once the consent of the Data Subject has been obtained, the response should be sent to the individual Data Subject and not the solicitor.

3.5 Dealing with Valid Requests

- 3.5.1 An individual may ask for a blanket of all the information held by RNCSF. RNCSF may seek clarification from the individual where such a SAR is received to help RNCSF comply with their obligations under the DPL.
- 3.5.2 Should any exemption apply with regard to the release of information regarding an individual's Personal Data the individual will be notified by RNCSF of the exemption/s applicable to the request.

3.6 Request Process – Employees

- 3.6.1 As RNCSF processes a large amount of Personal Data on employees, any employee may make a request for their Personal Data.
- 3.6.2 Any SAR that is received should, in the first instance be forwarded to the CEO.
- 3.6.3 On receipt of the SAR the CEO must ensure that a valid request in accordance with Paragraph 2 above has been made.
- 3.6.4 Please note that it will not be enough for the employee to state that they want for example, 'all emails about me'. They should be asked to specify the subject matter of the emails for example seeking information about a recent disciplinary hearing.
- 3.6.5 Once the CEO has received a SAR, they will locate and obtain the specific information requested and screen the data for the relevant information for disclosure.
- 3.6.6 The CEO will collate the Personal Data relating to the request and present it in a tabular form which will be provided to the Data Subject. This will be provided with the following information:
 - 3.6.6.1 whether RNCSF, or a third party on behalf of RNCSF, is Processing the Employee's Personal Data, for example, Pensions;

- 3.6.6.2 be given a description of that the Personal Data held e.g. the classes of Personal Data which we process in relation to the Data Subject (e.g. the following headers: name, address, numbers);
 - 3.6.6.3 a description of the Personal Data of which the Data Subject is the subject in respect of each class (e.g. information relating to the above headers);
 - 3.6.6.4 the purposes for which each class of the Data Subject's Personal Data are Processed;
 - 3.6.6.5 where known, the source of any Personal Data; and
 - 3.6.6.6 the recipients and classes of recipients to whom the Personal Data are disclosed.
- 3.6.7 If medical information is included within the file, please follow the procedures set out in Paragraph 3.9 below.
- 3.6.8 If the information requested refers to other individuals the following procedures will be followed:
- 3.6.8.1 the CEO will determine whether the information referring to the other individual is Personal Data, if the information is not Personal Data this information can be made available;
 - 3.6.8.2 if the information comprises Personal Data of another individual assess whether the information can be redacted;
 - 3.6.8.3 if the information is unable to be redacted, attempt to gain consent of the other individual, if consent is gained the information can be released;
 - 3.6.8.4 if consent cannot be gained, consider whether an exemption applies to the provision of the information to the individual seeking an SAR or harm may be suffered by the third party – generally in this situation Personal Data will not be disclosed;
 - 3.6.8.5 if consent is refused then the information can still be disclosed but only if the disclosure is required due to the overwhelming interests of the Data Subject making the request.
- 3.6.9 Please note that there is no right under a SAR to see or receive copies of documents. A SAR is not to be used as a fishing exercise to obtain information to bring a claim in the Employment Tribunal.
- 3.6.10 Any Personal Data contained in a personnel file, including personal opinions recorded about the Employee must be disclosed.
- 3.6.11 If you are unsure as to whether information constitutes Personal Data or a personal opinion, please consult with the CEO.

- 3.6.12 It is possible that the employee will ask to see a copy of their personnel file. If they wish to see a copy of the file, this is at the discretion of the CEO.
- 3.6.13 If a request to see a personnel file is granted:
- 3.6.13.1 the file should be reviewed and Personal Data relating to third parties should be removed;
 - 3.6.13.2 a time should be arranged for the file to be viewed;
 - 3.6.13.3 a member of HR must be present at the viewing;
 - 3.6.13.4 no information is to be removed from the personal files during the viewing.
- 3.6.14 Please note that exemptions may apply to a SAR. Should there be information that you do not wish to disclose, please take legal advice before applying any of the exemptions set out in the legislation.
- 3.6.15 Should an Employee seek access to their Occupational Health data the CEO should seek advice from an Occupational Health Advisor for further assistance.
- 3.6.16 A SAR received from a former Employee should be treated in the same manner as outlined in this section.

3.7 Request Process – All other individuals

- 3.7.1 For Trustees, Volunteers, Supporters, Customers, Suppliers, Contractors, Service Users and any other person whose Personal Data are Processed by RNCSF a request can be in any form.
- 3.7.2 The CEO will, upon receipt of a SAR, send an acknowledgement of receipt of the request and indicate that RNCSF will respond within the statutory time period. The statutory time period is currently 40 calendar days from receipt of a valid subject access request.
- 3.7.3 The CEO will co-ordinate the subject access request with all relevant people that are responsible for the holding of Personal Data.
- 3.7.4 The same issues will apply as are set out in respect of a request by an employee.
- 3.7.5 If medical information is included within the file, please follow the procedures set out in Paragraph 3.9 below.
- 3.7.6 The response to the request should be made in writing within 40 days and must contain the information set out in Paragraph 3.8 below.

3.8 SAR information response

- 3.8.1 The following information must be included in the response to the SAR:
- 3.8.1.1 the purposes of the Processing;

- 3.8.1.2 the categories of Personal Data concerned;
 - 3.8.1.3 the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in countries outside of the UK or international organisations;
 - 3.8.1.4 where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
 - 3.8.1.5 the existence of the right to request from the controller rectification or erasure of Personal Data or restriction of Processing of Personal Data concerning the Data Subject or to object to such Processing;
 - 3.8.1.6 the right to lodge a complaint with a supervisory authority;
 - 3.8.1.7 where the Personal Data are not collected from the Data Subject, any available information as to their source;
 - 3.8.1.8 the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.
- 3.8.2 The response must be provided in an easily accessible form and would normally be provided in the form of a letter which includes a schedule attached setting out the information required, an example of a form is included in Schedule 16 – please note that this is designed for an employee and will need to be adjusted for non-employees.

3.9 **Medical information held by RNCSF**

- 3.9.1 RNCSF may in some situations hold medical information, for example Doctor's reports which have been forwarded to RNCSF.
- 3.9.2 Historically medical information could only be provided to a Data Subject if RNCSF has direct knowledge that the Data Subject has been provided with the medical information.
- 3.9.3 Historically, if RNCSF does not have knowledge that the medical information has been provided to the Data Subject then RNCSF is required to either not make the disclosure or to obtain a medical opinion on the effect of disclosure to the Data Subject prior to such disclosure.
- 3.9.4 If the medical advisor confirms that the information would not harm the person making the request RNCSF may release the medical information and it will be included in the SAR response. The presumption will be on disclosure.

SECTION 4 – GENERAL PRINCIPLES OF DATA MANAGEMENT

1 General Introduction

- 1.1 The DPL does not provide a set of prescriptive requirements setting out how each organisation processes Personal Data. The DPL provides a framework within which any Processing must take place.
- 1.2 Therefore, it is essential that each organisation Processing Personal Data analyses the Personal Data that it processes and the purposes for which the Personal Data are processed.
- 1.3 The organisation is then required to ensure that the Principles are met, not only in respect of each type of Personal Data, but for each purpose those Personal Data are processed.
- 1.4 The Personal Data processed by RNCSF can be split into the following categories:
 - 1.4.1 Employees;
 - 1.4.2 Volunteers and Trustees;
 - 1.4.3 Contractors / Consultants / Agency;
 - 1.4.4 Supported Young People;
 - 1.4.5 Parents and Guardian;
 - 1.4.6 Applicants;
 - 1.4.7 Donors;
 - 1.4.8 Suppliers;
 - 1.4.9 General contacts, e.g.
 - 1.4.9.1 marketing contacts; and
 - 1.4.9.2 complainants.
- 1.5 RNCSF processes the Personal Data on each category for a number of different purposes. It is important that the framework of the DPL is applied to each of the purposes. The remainder of this section sets out how RNCSF will ensure that the DPL applies to each category and each purpose for which Personal Data are processed within those categories.

2 The Principles and the lawful basis for processing personal data

2.1 Lawful

2.1.1 The Processing of Personal Data is lawful provided that at least one of the conditions set out in Article 5 and 6 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the GDPR one of the Principles set out in Article 9 of the GDPR also applies.

2.1.2 The Principles set out in Article 5 and 6 of the UK GDPR are as follows:

- 2.1.2.1 the Data Subject has provided consent to the Processing;
- 2.1.2.2 Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract;
- 2.1.2.3 Processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- 2.1.2.4 Processing is necessary in order to protect the vital interests of the Data Subject or another natural person;
- 2.1.2.5 Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller; or
- 2.1.2.6 Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, in particular where the Data Subject is a child.

2.1.3 The Processing of Special Categories of Data is lawful when the:

- 2.1.3.1 Data Subject has given explicit consent to the Processing of those personal data for one or more specified purposes, except where the law provides the Data Subject is not permitted to grant such consent;
- 2.1.3.2 Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the Data Subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the Data Subject;

- 2.1.3.3 Processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent;
- 2.1.3.4 Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the Processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the Data Subjects;
- 2.1.3.5 In such cases where the lawful grounds used are those detailed in 2.1.3.4, a balancing test will be completed to establish a fair and reasonable balance between the interests of RNCSF and the rights and freedoms of the individuals that may be identified by such personal data;
- 2.1.3.6 Processing relates to personal data which are manifestly made public by the Data Subject;
- 2.1.3.7 Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- 2.1.3.8 Processing is necessary for reasons of substantial public interest, on the basis of the law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the Data Subject;
- 2.1.3.9 Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of the law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;
- 2.1.3.10 Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of the law which provides for suitable and specific measures to safeguard the rights and freedoms of the Data Subject, in particular professional secrecy;
- 2.1.3.11 Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on the law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the Data Subject.

- 2.1.4 In addition to the provisions above, the DPA provides for Processing in some specific circumstances which are included in this Policy where relevant.
- 2.1.5 Notwithstanding the above, a provision which states that such Processing is unlawful, cannot become lawful simply because the Processing sits within one of the provisions set out above.
- 2.1.6 The CEO is responsible for ensuring that all Processing reported to them as the person responsible for data protection compliance within RNCSF will be reviewed to ensure that the general principle of undertaking such Processing is lawful.

2.2 Fair

2.2.1 The Processing of Personal Data is fair providing that the Data Subjects are provided certain information, in particular, information to the Data Subjects on the identity of the controller and the purposes of the Processing and further information to ensure fair and transparent Processing in respect of the natural persons concerned and their right to obtain confirmation and communication of Personal Data concerning them which are being processed. specifically:

- 2.2.1.1 the name of RNCSF as Data Controller;
- 2.2.1.2 Where it is possible, the name of any other Data Controller with whom the data may be shared
- 2.2.1.3 the purposes/s for which the data are intended to be processed;
- 2.2.1.4 information on the rights and freedoms granted to the Data Subject by the DPL; and
- 2.2.1.5 all other information relevant to the Processing.

2.2.2 RNCSF ensures that it is compliant with the fair Processing principle by ensuring that:

- 2.2.2.1 RNCSF complies with the requirements of the GDPR; and
- 2.2.2.2 each form of Processing is notified to each Data Subject in the form of a data Processing statement, under Article 13 or Articles 14 of the GDPR; or
- 2.2.2.3 an exemption applies to the Processing which is taking place for example a transfer for the purposes of crime prevention may be exempt under the DPA.

2.3 Transparent

- 2.3.1 All Processing should be transparent to natural persons that Personal Data concerning them are collected, used, consulted or otherwise processed and to what extent the Personal Data are or will be processed.
- 2.3.2 The principle of transparency requires that any information and communication relating to the Processing of those Personal Data be easily accessible and easy to understand, and that clear and plain language be used.

2.3.3 Natural persons should be made aware of risks, rules, safeguards and rights in relation to the Processing of Personal Data and how to exercise their rights in relation to such Processing.

2.4 Specified Purposes

2.4.1 It is a requirement of the DPL that Personal Data are only processed for one or more specified purposes.

2.4.2 The specific purposes for which Personal Data are processed should be explicit and legitimate and determined at the time of the collection of the Personal Data.

2.4.3 RNCSF complies with this requirement by ensuring that the purposes for all Processing are specified in its subject access statement for all Data Subjects.

2.4.4 The DPL permits that Processing which is analogous to a specified form of Processing may also take place. It is the CEO's decision as to whether any form of Processing is analogous to purposes specified in the subject access statement.

2.4.5 However, no additional purpose may be incompatible with the initial purposes.

2.4.6 Archiving in the public interest, scientific or historical research and statistical purposes will not be considered to be incompatible with the initial purposes provided that they are undertaken in accordance with Articles 89(1) of the GDPR.

2.4.7 The Processing of Personal Data for purposes other than those for which the Personal Data were initially collected should be allowed only where the Processing is compatible with the purposes for which the Personal Data were initially collected. In such a case, no legal basis separate from that which allowed the collection of the Personal Data is required.

2.4.8 In order to ascertain whether a purpose of further Processing is compatible with the purpose for which the Personal Data are initially collected, RNCSF, after having met all the requirements for the lawfulness of the original Processing, should take into account, inter alia: any link between those purposes and the purposes of the intended further Processing; the context in which the Personal Data have been collected, in particular the reasonable expectations of Data Subjects based on their relationship with RNCSF as to their further use; the nature of the Personal Data; the consequences of the intended further Processing for Data Subjects; and the existence of appropriate safeguards in both the original and intended further Processing operations.

2.4.9 Where the Data Subject has given consent or the Processing is based on Union or Member State law which constitutes a necessary and proportionate measure in a democratic society to safeguard, in particular, important objectives of general public interest, RNCSF should be allowed to further process the Personal Data irrespective of the compatibility of the purposes. In any case, the application of the principles set out in this Regulation and in particular the information of the Data Subject on those other purposes and on his or her rights including the right to object, should be ensured.

- 2.4.10 Transmission in the legitimate interest of RNCSF or further Processing of Personal Data is prohibited if the Processing is not compatible with a legal, professional or other binding obligation of secrecy.
- 2.5 Adequate, Relevant and Limited to What is Necessary
- 2.5.1 The Personal Data should be adequate, relevant and limited to what is necessary for the purposes for which they are processed. This requires, in particular, ensuring that the period for which the Personal Data are stored is limited to a strict minimum. Personal data should be processed only if the purpose of the Processing could not reasonably be fulfilled by other means.
- 2.5.2 RNCSF must always ensure that it has enough information to make decisions in relation to any form of Processing.
- 2.5.3 RNCSF must ensure that all Personal Data that are processed for a particular purpose are relevant to that Processing.
- 2.5.4 Personal Data collected should not be excessive for the purposes for which they are collected. For example, at the time RNCSF is recruiting potential new employees it should only collect the Personal Data required for the recruitment Processing. Information required for employment should only be collected should the potential employee be employed.
- 2.5.5 RNCSF complies with this requirement by following the procedures set out for each category of Personal Data and each purpose by following the guidelines in this Policy.
- 2.6 Accurate and Kept Up to Date
- 2.6.1 RNCSF must ensure that information which is transcribed is checked for accuracy and that the information will be corrected if identified as incorrect by the Data Subject or on general review.
- 2.6.2 All information should be regularly reviewed to ensure that it is up to date.
- 2.6.3 Where necessary erasure or rectification must be undertaken without delay.
- 2.6.4 Every reasonable step should be taken to ensure that Personal Data which are inaccurate are rectified or deleted.
- 2.7 Not Kept for Longer than Necessary
- 2.7.1 There are few rules as to how long any particular data are required to be kept, these rules are usually provided by statute (e.g. the Health and Safety Legislation) or codes of practice.
- 2.7.2 RNCSF must be able to justify for how long particular Personal Data are retained. These justifications are set out in this Policy.

2.7.3 Therefore, in order to ensure that the Personal Data are not kept longer than necessary, time limits should be established by the controller for erasure or for a periodic review.

2.8 Security

2.8.1 Ensuring that Personal Data are kept securely and only used for the specified purposes is of general application. Specific requirements for any particular forms of Personal Data are specified in Section 5.

2.8.2 Personal data should be processed in a manner that ensures appropriate security and confidentiality of the Personal Data, including for preventing unauthorised access to or use of Personal Data and the equipment used for the Processing.

2.8.3 All RNCSF personnel will ensure that any Personal Data held is secure, specifically:

2.8.3.1 manual files should be held in lockable filing cabinets;

2.8.3.2 offices should be secure and only accessed by authorised staff;

2.8.3.3 Personal Data held on portable media is held in accordance with 6.3 above; and

2.8.3.4 computer files which hold Personal Data are password protected and computers are locked whenever an Employee or Volunteer leaves their desk.

2.9 Data Protection Impact Assessments

2.9.1 It is a requirement of the UK GDPR that a Data Protection Impact Assessment (**DPIA**) is undertaken prior to any Processing of Personal Data which is likely to be high- risk commencing. Some Processing which requires a DPIA is set out in the DPL, in other cases there is no requirement only a recommendation. It is also good practice to do a DPIA for any other major project which requires the Processing of Personal Data.

2.9.2 A DPIA is a way for RNCSF to systematically and comprehensively analyse its Processing and help RNCSF identify and minimise data protection risks.

2.9.3 DPIAs should consider compliance risks, but also broader risks to the rights and freedoms of individuals, including the potential for any significant social or economic disadvantage. The focus is on the potential for harm – to individuals or to society at large, whether it is physical, material or non-material.

2.9.4 To assess the level of risk, a DPIA must consider both the likelihood and the severity of any impact on individuals.

2.9.5 A DPIA does not have to indicate that all risks have been eradicated. But it should help RNCSF document them and assess whether or not any remaining risks are justified.

- 2.9.6 The DPIA must:
- 2.9.6.1 describe the nature, scope, context and purposes of the processing;
 - 2.9.6.2 assess necessity, proportionality and compliance measures;
 - 2.9.6.3 identify and assess risks to individuals; and
 - 2.9.6.4 identify any additional measures to mitigate those risks.
- 2.9.7 To assess the level of risk, you must consider both the likelihood and the severity of any impact on individuals. High risk could result from either a high probability of some harm, or a lower possibility of serious harm.
- 2.9.8 Where appropriate, you should consult individuals and relevant experts.
- 2.9.9 If you identify a high risk that you cannot mitigate, you must consult the ICO before starting the processing. The ICO aims to respond within 8 weeks of the request being received.
- 2.9.10 A DPIA is required when RNCSF plans to:
- 2.9.10.1 use systematic and extensive profiling or automated decision-making to make significant decisions about people;
 - 2.9.10.2 Process special-category data or criminal-offence data on a large scale;
 - 2.9.10.3 systematically monitor a publicly accessible place on a large scale;
 - 2.9.10.4 use innovative technology in combination with any of the criteria in the European guidelines;
 - 2.9.10.5 use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit;
 - 2.9.10.6 carry out profiling on a large scale;
 - 2.9.10.7 Process biometric or genetic data in combination with any of the criteria in the European guidelines;
 - 2.9.10.8 combine, compare or match data from multiple sources;
 - 2.9.10.9 Process Personal Data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;
 - 2.9.10.10 Process Personal Data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;

- 2.9.10.11 Process children’s Personal Data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them;
 - 2.9.10.12 Process Personal Data that could result in a risk of physical harm in the event of a security breach.
- 2.9.11 A DPIA should be considered when RNCSF plans to undertake:
- 2.9.11.1 evaluation or scoring;
 - 2.9.11.2 automated decision-making with significant effects;
 - 2.9.11.3 systematic monitoring;
 - 2.9.11.4 Processing of sensitive data or data of a highly personal nature;
 - 2.9.11.5 Processing on a large scale;
 - 2.9.11.6 Processing of data concerning vulnerable data subjects;
 - 2.9.11.7 innovative technological or organisational solutions;
 - 2.9.11.8 Processing that involves preventing Data Subjects from exercising a right or using a service or contract.
- 2.9.12 RNCSF in respect of each DPIA will:
- 2.9.12.1 describe the nature, scope, context and purposes of the processing;
 - 2.9.12.2 ask the RNCSF Data Processors to help RNCSF understand and document their processing activities and identify any associated risks;
 - 2.9.12.3 consider how best to consult individuals (or their representatives) and other relevant stakeholders;
 - 2.9.12.4 ask for the advice of from a data protection specialist;
 - 2.9.12.5 check that the processing is necessary for and proportionate to the RNCSF purposes, and describe how RNCSF will ensure compliance with data protection principles;
 - 2.9.12.6 do an objective assessment of the likelihood and severity of any risks to individuals’ rights and interests;
 - 2.9.12.7 identify measures RNCSF can put in place to eliminate or reduce high risks;
 - 2.9.12.8 record our decision-making in the outcome of the DPIA, including any difference of opinion with RNCSF’s data protection advisor or individuals consulted;

- 2.9.12.9 implement the measures RNCSF identified, and integrate them into the RNCSF project plan;
 - 2.9.12.10 consult the ICO before Processing, if high risks cannot be mitigated;
 - 2.9.12.11 keep all of its DPIAs under review and revisit them when necessary.
- 2.9.13 In relation to each DPIA RNCSF shall ensure that it has:
- 2.9.13.1 confirmed whether the DPIA is a review of pre-GDPR Processing or covers Processing due to commence, including timelines in either case;
 - 2.9.13.2 explained why RNCSF needed a DPIA, detailing the types of intended Processing that made it a requirement;
 - 2.9.13.3 structured the document clearly, systematically and logically;
 - 2.9.13.4 written the DPIA in plain English, with a non-specialist audience in mind, explaining any technical terms and acronyms RNCSF has used;
 - 2.9.13.5 set out clearly the relationships between Data Controllers, Data Processors, Data Subjects and systems, using both text and data-flow diagrams where appropriate;
 - 2.9.13.6 ensured that the specifics of any flows of Personal Data between people, systems, organisations and countries have been clearly explained and presented;
 - 2.9.13.7 explicitly stated how RNCSF is complying with each of the Data Protection Principles under GDPR and clearly explained our lawful basis for Processing (and special category conditions if relevant);
 - 2.9.13.8 explained how we plan to support the relevant information rights of RNCSF Data Subjects;
 - 2.9.13.9 identified all relevant risks to individuals' rights and freedoms, assessed their likelihood and severity, and detailed all relevant mitigations;
 - 2.9.13.10 explained sufficiently how any proposed mitigation reduces the identified risk in question;
 - 2.9.13.11 evidenced RNCSF's consideration of any less risky alternatives to achieving the same purposes of the processing, and why we didn't choose them;
 - 2.9.13.12 given details of stakeholder consultation (e.g. data subjects, representative bodies) and included summaries of findings;
 - 2.9.13.13 attached any relevant additional documents RNCSF references in its DPIA, e.g. Privacy Notices, consent documents;

- 2.9.13.14 ensured the DPIA is signed off by the appropriate people;
 - 2.9.13.15 agreed and documented a schedule for reviewing the DPIA regularly or when we change the nature, scope, context or purposes of the Processing;
 - 2.9.13.16 consulted the ICO if there are residual high risks which cannot be mitigated.
- 2.9.14 Informal assessments have been undertaken on all Processing undertaken by RNCSF whilst this Policy was in development and formal documented DPIAs will be required once the policy is fully operational.
- 2.9.15 RNCSF should follow the Information Commission's Office checklist on DPIAs to ensure that all requirements have been met.
- 2.10 Lawful Basis
- 2.10.1 Often the simplest way of ensuring that Processing of Personal Data will be lawful is to obtain the consent of the Data Subject, but there are some circumstances where consent is not permitted, for example, where consent cannot be freely given, such as when a relationship is unequal or where there is a legal relationship requiring the Processing of the Personal Data. In these circumstances consent will not apply and one of the other legal basis must be used.
 - 2.10.2 In many cases the basis for the Processing will be clear, e.g. there is contact between the Data Subject and RNCSF, there is a legal requirement to Process the Personal Data e.g. to allow a donor to claim Gift Aid, or to protect vital interests.
 - 2.10.3 However, where there is a need to Process Personal Data, but there is no other basis, RNCSF may wish to use the fact that the Processing falls within the legitimate interest pursued by RNCSF. If legitimate interests is used it is essential that a legitimate interests assessment is undertaken in relation to the Processing. This will confirm whether there are sufficient legitimate interests to permit this as the legal basis of the Processing.
 - 2.10.4 In order to undertake a legitimate interests assessment, you will need to consider three tests:
 - 2.10.4.1 the Purpose Test;
 - 2.10.4.2 the Necessity Test; and
 - 2.10.4.3 the Balancing Test
 - 2.10.5 When considering the Purpose Test you will need to consider the following questions to assess whether there is a legitimate interest behind the Processing:
 - 2.10.5.1 Why do you want to Process the data?
 - 2.10.5.2 What benefit do you expect to get from the Processing?

- 2.10.5.3 Do any third parties benefit from the Processing?
- 2.10.5.4 Are there any wider public benefits to the Processing?
- 2.10.5.5 How important are the benefits that you have identified?
- 2.10.5.6 What would the impact be if you couldn't go ahead with the Processing?
- 2.10.5.7 Are you complying with any specific data protection rules that apply to your Processing (e.g. profiling requirements, or e-privacy legislation)?
- 2.10.5.8 Are you complying with other relevant laws?
- 2.10.5.9 Are you complying with industry guidelines or codes of practice?
- 2.10.5.10 Are there any other ethical issues with the Processing?
- 2.10.6 When considering the Necessity Test you will need to assess whether the Processing is necessary for the purpose you have identified:
 - 2.10.6.1 Will this Processing actually help you achieve your purpose?
 - 2.10.6.2 Is the Processing proportionate to that purpose?
 - 2.10.6.3 Can you achieve the same purpose without the Processing?
 - 2.10.6.4 Can you achieve the same purpose by Processing less data, or by Processing the data in another more obvious or less intrusive way?
- 2.10.7 When considering the Balancing Test you will need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests:
 - 2.10.7.1 In the first instance you need to consider the Nature of the Personal Data:
 - (a) Is it special category data or criminal offence data?
 - (b) Is it data which people are likely to consider particularly 'private'?
 - (c) Are you Processing children's data or data relating to other vulnerable people?
 - (d) Is the data about people in their personal or professional capacity?
 - 2.10.7.2 Having considered the nature of the Personal Data, it is then necessary to consider the reasonable expectations of the Data Subject:

- (a) Do you have an existing relationship with the individual?
- (b) What's the nature of the relationship and how have you used data in the past?
- (c) Did you collect the data directly from the individual? What did you tell them at the time?
- (d) If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?
- (e) How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- (f) Is your intended purpose and method widely understood?
- (g) Are you intending to do anything new or innovative?
- (h) Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation?
- (i) Are there any other factors in the particular circumstances that mean they would or would not expect the Processing?

2.10.7.3 It is then necessary to consider the likely impact on the Processing:

- (a) What are the possible impacts of the Processing on people?
- (b) Will individuals lose any control over the use of their personal data?
- (c) What is the likelihood and severity of any potential impact?
- (d) Are some people likely to object to the Processing or find it intrusive?
- (e) Would you be happy to explain the Processing to individuals?
- (f) Can you adopt any safeguards to minimise the impact?

2.10.7.4 Is it possible to offer the individual and opt-out from the Processing of their Personal Data?

2.10.7.5 Taking all of the above issues into consideration it is then necessary to make the decision on whether you can Process Personal Data on a legitimate interests basis.

2.10.7.6 Once the decision is taken you should note any comments to justify the answer

2.10.7.7 The answers should be recorded in writing and the legitimate interests assessment should be stored securely with the RNCSF Data Protection filing.

2.10.7.8 The decision to use legitimate interests should be reviewed regularly, generally annually and not less than every two years.

- 2.11 A legitimate interests assessment form is attached as Schedule 15 which sets out the questions in this section as an assessment form.
- 2.12 The ICO has developed guidance on undertaking legitimate interest assessments and this should be considered in the development of assessments by RNCSF.
- 2.13 In any event, where legitimate interest is used as the lawful grounds for processing data, the Data Controller shall uphold the right to object to such processing unless the legitimate interest outweighs such an objection. Such decisions will be made on a case by case basis.

3 Children

- 3.1 The Processing of Personal Data relating to children is considered to be high risk and must be undertaken in accordance with Article 8 of the UK GDPR and the provisions of the DPA.
- 3.2 Children need particular protection when you are collecting and processing their personal data because they may be less aware of the risks involved. This is especially relevant to RNCSF as the majority of its beneficiaries are children.
- 3.3 RNCSF is required to think about the need to protect children in all of its Processing activities and design its systems and processes with this in mind. In particular it is important that the principles of fairness are applied to the Processing of a child's Personal Data.
- 3.4 If consent is the basis of the Processing personal data, a child aged 13 or over may be able to provide their own consent. If the child is 13 years or under, a parent is required to give consent on their child's behalf. In certain circumstances, consent may need to be supported by the parents even if the child is over the age of 13.
- 3.5 As it is not possible to undertake the support of children without being able to Process their Personal Data, consent is not the base for the Processing which is undertaken. However, consent is required to electronic marketing activity and RNCSF has designed its systems so that consent is obtained from the child they are supporting as well as their parents. Generally Processing of children's data for marketing purposes will only take place where there is no other alternative.
- 3.6 RNCSF shall not usually make decisions based solely on automated Processing about children.
- 3.7 RNCSF has written clear privacy notices (Article 13 Statements) for children so that they are able to understand what will happen to their Personal Data, and what rights are available to the children.
- 3.8 Children have the same rights as adults over their personal data. These include the rights to access their Personal Data; request rectification; object to processing and have their Personal Data erased.

4 Data Sharing

- 4.1 RNCSF will be required to share data in a variety of ways, usually this is as a result of a data transfer where either RNCSF transfer data to a third party so that they become data controllers in common, or vice versa where RNCSF receives the data and becomes a data controller in common. Further, there are complex arrangements where there is a mix of data transfers and data processing.
- 4.2 Wherever there is data sharing RNCSF will enter into a written agreement with the other party(ies) and ensure that the agreement is made in accordance with this Policy and the DPL. Reference should also be made to the Data Processing section of this Policy in PART 2.
- 4.3 RNCSF undertakes data sharing with schools and this is done under a bespoke data sharing agreement which sets out:
- 4.3.1 the responsibilities of RNCSF;
 - 4.3.2 the responsibilities of the school; and
 - 4.3.3 the responsibilities of any third party, such as the other charities assisting with the pastoral care of the supported person.
- 4.4 There are two template agreements, one which includes the school and a third party partner and one which is just between RNCSF and the School.
- 4.5 In relation to the agreement's:
- 4.5.1 the role of RNCSF is to give life-transforming opportunities to disadvantaged and vulnerable children who typically come from a background of social deprivation by facilitating full bursaries for a state or independent boarding school education.
 - 4.5.2 the role of the school is providing education and pastoral care to the disadvantaged and vulnerable children benefiting from the bursaries facilitated by RNCSF.
 - 4.5.3 the role of the partner organisation is to provide support for young people in the community in which it operates, which includes the provision of support to children being educated by the school as a result of the opportunities facilitated by the RNCSF.
- 4.6 Generally, RNCSF, the school and the partner organisation will have entered into a Memorandum of Understanding (the **MOU**) in relation to the children who are being educated at the school having been introduced by RNCSF. The purpose of the MOU is to set out the terms on which RNCSF the school and the partner organisation have agreed to work together in the best interests of the children to provide them with life-transforming educational and social experiences and opportunities in an environment of coherent and cohesive year-round pastoral support.
- 4.7 RNCSF and the school will also have entered into an agreement to fund the child(ren) being educated at the School. The purpose of the funding agreement is to set out the funding arrangements for the pupil's education and any specific requirements related to that pupil's

needs. The partner organisation may be a party to the funding agreement, if the partner organisation is providing funding assistance in relation a child educated at the school.

- 4.8 In relation to the Processing which is undertaken:
- 4.8.1 RNCSF shall Process Personal Data in respect of each pupil educated at the school which it is permitted to share with the school and/or the partner organisation and which is necessary for the School to hold in respect of the services provided under the terms agreed with parents supported and set out in the subject information statement issued to parents.
- 4.8.2 The school processes Personal Data in respect of each pupil educated at the school who has been introduced by RNCSF and is supported by the partner Organisation. The school is permitted to share such Personal Data with RNCSF and the partner organisation in respect of each pupil's activities at the school where it is necessary for RNCSF or the partner organisation to provide or facilitate the bursary or other involvement or activity over the period of each pupil's education, whether this is within the school or within the pupil's home community.
- 4.8.3 The partner organisation Processes Personal Data in respect of each pupil educated at the school who has been introduced by RNCSF and is supported by the partner organisation. The partner organisation is permitted to share such Personal Data with RNCSF and the school where it is necessary to for RNCSF or the school to Process such Personal Data to provide or facilitate the bursary for that pupil or to provide that pupil with support and/or pastoral care, whether within the School in in the pupil's home and/or community
- 4.9 The purpose of the agreement is to facilitate the sharing of Personal Data between RNCSF, the school and the partner organisation to ensure each has all of the necessary Personal Data it needs in order to ensure that the education and pastoral services are delivered and properly funded and each pupil is cared for appropriately. All sharing of Personal Data between the Parties is undertaken within the Agreement.
- 4.10 Whilst an element of trust with the schools and partner organisations is required, it is important that RNCSF checks to ensure that the processing notified to parents and pupils by the school and the partner organisation permits the transfer to RNCSF. If not, the school or the partner organisation may refuse to provide RNCSF with important information. Checks can usually be done by obtaining a copy of the school and partner organisation subject information statements under Article 13 of the GDPR which will set out the permissions granted. The agreements provide that the power has been given to the school and the partner organisation to share the data, therefore, the statements from a sample of schools should be checked annually, with different schools and partner organisations being checked each year.
- 4.11 Please note that RNCSF may have multiple agreements with each school setting out the Processing of Personal Data in respect of children educated at the particular school through funding provided by or facilitated through or in relation to RNCSF, for example, separate agreements would be required where:
- 4.11.1 the school is educating children who are introduced and funded solely by the school and RNCSF, the Processing of Personal Data shall be managed by an agreement between RNCSF and the school.
- 4.11.2 a third party is involved in either the funding of the education or the pastoral support of children educated at the school.
- 4.11.3 there are multiple partner organisations involved with a school, but not necessarily all of the pupils.

SECTION 5 – DATA

1 Employees

1.1 General

1.1.1 This section relates to employees of RNCSF, no matter whether they are full time or part time or on a temporary contact.

1.1.2 It does not apply to Personal Data relating volunteers, trustees, consultants or agency staff.

1.2 Personal Data Held

1.2.1 All employees of RNCSF will have an employment file held by the CEO. This file is held in hard copy and may include:

- Name;
- Date of Birth;
- Medical information;
- Contact details;
- Address;
- Next of Kin.

1.2.2 In addition, certain in many cases the CEO will hold:

- An individual's current appraisal and objectives/performance review documentation;
- Training and Development Records;
- Safety Assessments;
- Medical Reports and Health Screening Assessments;
- Payroll information;
- Pension Information;
- Employment Assessments Results.

1.3 Meeting the Requirements of Each Principle

1.3.1 Lawful

1.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the GDPR one of the Principles set out in Article 9 of the UK GDPR also applies.

1.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to employee Personal Data as a matter of law separate to the DPL.

1.3.1.3 The legal basis on which the Processing of employee Personal Data takes place i

- (a) the contract between RNCSF and the employee;
- (b) the employment condition set out in Article 9(2)(b) of the UK GDPR which permits the Processing of Special Categories of Personal Data for the purpose of employment to comply with our employment law and associated obligations;
- (c) the protection of the employee's vital interests, specifically in relation to health and safety and the protection of the employee's health in accordance with Articles 6(1)(d) and 9(2)(c).

1.3.1.4 RNCSF makes it clear to each employee that as RNCSF processes their personal data for the purposes of the contract between them and for under the specific employment condition, RNCSF does not need to obtain the employees consent for the Processing it undertakes relating to Personal Data.

1.3.2 Fairness

1.3.2.1 RNCSF ensures that it operates fairly with employees by providing the employees the following information in its employee Data Subject Information Statement under Article 13 or 14 of the GDPR:

- (a) the name of RNCSF as Data Controller;
- (b) the purposes/s for which the data are intended to be processed;
- (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
- (d) all other information relevant to the Processing.

1.3.3 Transparent

1.3.3.1 RNCSF has developed this policy and the employee Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to employees.

1.3.3.2 Information in the Policy is also included in the Employee Handbook and the information is reviewed regularly to ensure that it remains consistent. The CEO shall ensure that a review is undertaken of this Policy and the Employee Handbook on an annual basis to ensure that the information contained within is complementary and complete

1.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for employees

1.3.4 Processing Purposes and Ancillary Use

1.3.4.1 The employee's Personal Data are Processed for the following purposes:

- (a) the administration of the employee's employment with RNCSF;

- (b) where RNCSF are required to do so, confirming the employee's suitability and continued suitability for the work that they carry out, including any checks and updates that are required to be made by RNCSF or any other body:
- with the Disclosure and Barring Service which may result in RNCSF retaining information about criminal convictions;
 - in connection with your health including screening and making decisions based on any health records which may be collected by, or transferred to, RNCSF;
- (c) any statutory requirements relating to the employee, or any application or employee submission made by them in relation to their employment;
- (d) managing and administering any employment processes relating to the employee; and
- (e) retention of the employee's Personal Data following the end of their employment to ensure that sufficient information is maintained for the purposes of confirming their employment, maintaining RNCSF's records and areas of responsibility and the provision of references;
- (f) RNCSF may transfer the employee's Personal Data to the following organisations or category of organisations:
- HMRC;
 - our sub-contractors providing services to us, for example payroll, pension providers, professional advisors, providers of employee benefits;
 - central and local government and their agencies;
 - banks and other institutions requiring references;
 - the Disclosure and Barring Service if we are required to undertake checks in relation to your suitability to undertake a designated role.
- 1.3.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all employees. The employee Data Subject Information Statement is provided to the employees with their employment contract. It is not part of their employment contract, and can be updated within the scope of the DPL, but is provided so that the employee is aware of the Processing at the same time they are reviewing their contract of employment
- 1.3.4.3 RNCSF may undertake Processing of Personal Data relating to employees which is not included in the Data Subject Information Statement for employees, however, this is only permitted where it is ancillary to one of the purposes specified
- 1.3.4.4 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the employee Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted
- 1.3.4.5 Disclosures other than specified in this Policy should be referred for legal advice,

for example, police requests in relation to court proceedings or witness evidence

- 1.3.4.6 RNCSF may Process employee Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the UK GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes.
- 1.3.5 Adequate, relevant and limited to what is necessary
- 1.3.5.1 RNCSF shall ensure that all employee Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 1.3.5.2 RNCSF shall collect Personal Data from the employee and any relevant referee and other third parties, to ensure that it has adequate Personal Data to allow it to make all relevant employment decisions in relation to the employee – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the employee or the relevant third party.
- 1.3.5.3 RNCSF shall only collect Personal Data which are relevant to the role that the employee is undertaking
- 1.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to an employee, such Personal Data shall be removed from the files and destroyed in a confidential manner or returned to the employee
- 1.3.6 Accurate and, where necessary, kept up to date
- 1.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
- 1.3.6.2 RNCSF shall ensure that Personal Data added to any human resources system e.g. an HR Database or a spreadsheet or payroll system is correctly entered and audited following entry and any errors corrected.
- 1.3.6.3 RNCSF shall ask employees on a regular basis with intervals of not less than 12 months and not more than 24 months to review all Personal Data held about them and to provide corrections.
- 1.3.6.4 RNCSF shall in its employee handbook request all employees to provide updated information to RNCSF as soon as any Personal Data changes, for example, the employee moves home or changes their marital status.
- 1.3.6.5 Where an Employee has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information

1.3.6.6 Information that is necessary for the administration of employee benefits, contact details and next of kin details are required for health and safety reasons. It is a condition of an Individual's employment that if there are any change in circumstances of the employee that these have been notified to the CEO as soon as is practicable to allow records to remain updated.

1.3.7 Storage

1.3.7.1 RNCSF shall keep all employee Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.

1.3.7.2 Personal Data relating to employees may be stored by RNCSF for longer periods than is strictly necessary insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the UK GDPR

1.3.7.3 An Employee's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.

1.3.7.4 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.

1.3.7.5 Employees may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court.

1.3.8 Security

1.3.8.1 RNCSF shall ensure that all employee Personal Data are 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.

1.3.8.2 Any paper files will be kept:

- (a) by the CEO;
- (b) in locked cabinets that are only accessible by the authorised staff.

1.3.8.3 Any files held by managers outside of the CEO will be kept in locked cabinets and the CEO shall be informed of all such files and their location.

1.3.8.4 Any Personal Data that is stored within RNCSF's computer system

is password protected.

- 1.3.8.5 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
- 1.3.8.6 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
- 1.3.8.7 No files shall be retained by RNCSF employees on home computers or in hard copy at home or otherwise outside of RNCSF's premises.
- 1.3.8.8 Where Personal Data relating to employees is passed to trustees, this shall be done by sending to the trustees' RNCSF email account or by a secure document sharing service which does not permit the trustee to download to a system outside the control of RNCSF. This shall also apply to documents which may include Personal Data such as Board papers. This requirement is in line with the guidance issued by the Charity Commission and the ICO

1.3.9 Employees' Medical Records

- 1.3.9.1 RNCSF will process any employee's medical records, if they are made available to RNCSF in accordance with the DPL and this Policy. If this is the case, then the procedures in Paragraph 3.9 above shall apply.
- 1.3.9.2 A subject information statement shall be placed on the medical declarations form. A copy of this form is attached at Schedule 2.
- 1.3.9.3 Any medical information that is held by RNCSF will be used only as necessary in respect of the employee's employment with RNCSF.
- 1.3.9.4 The information collected regarding an Employee's health is restricted only to those who require the information. For example, if the Employee has an ongoing but stable condition such as epilepsy other staff may be notified to allow action to be taken where a seizure occurs. RNCSF will seek the written consent of the employee to release this type of information.
- 1.3.9.5 Medical information used for statistical and general purposes is anonymised when required.
- 1.3.9.6 Medical testing (e.g. in respect of alcohol use) should only take place in respect of those to whom it is relevant e.g. a health professional not a receptionist. Such records should not be retained should any testing be negative. A record of the test date and the result may be retained

1.3.10 Monitoring

1.3.10.1 There are two main types of monitoring for employees of RNCSF:

- (a) monitoring to ensure that RNCSF's equipment is not being misused; and
- (b) statutory monitoring to ensure that an employee is not abusing someone in their care.

1.3.10.2 RNCSF when monitoring the charity email, telephone and internet usage ensures that it is compliant with the Regulation of Investigatory Powers Act 2000 (**RIPA**) and Telecommunications (Lawful Business Practice) Regulations 2000 (**LBP Regs**).

1.3.10.3 All employees' charity email and internet usage may be monitored to ensure that an Employee's personal use of email and internet remains at a minimum and does not interfere with the charity of RNCSF. For more information please see the Email and Internet Policy.

1.3.10.4 Employees are also provided with notice of such monitoring in their subject information statements

1.3.10.5 Any monitoring of employees using CCTV shall be undertaken in accordance with the RNCSF CCTV monitoring policy.

1.3.11 Transfer of Undertakings

1.3.11.1 Where RNCSF gains employees through a relevant transfer in accordance with the Transfer of Undertakings (Protection of Employment) Regulations 2006 (**TUPE**), RNCSF shall as soon as practicable send a subject information statement to the employee.

1.3.11.2 Where RNCSF transfers Employees through a relevant transfer in accordance with TUPE, RNCSF shall as soon as practicable ensure that the former Employee is aware that the new employer is now responsible for the Personal Data contained in the employment files.

1.3.11.3 RNCSF shall seek specific legal advice on this area as and when necessary.

1.3.12 Overseas Issues

1.3.12.1 RNCSF operates within the UK and Personal Data relating to employees shall not be transferred outside of the UK without the consent of the CEO and RNCSF reviewing the proposed transfer and confirming that the transfer is within the EEA or ensuring that a condition applies permitting the transfer outside of the EEA to continue.

1.3.10.6 Due to the nature of the Internet it is possible that some Personal

Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to employees. This includes where employees may be working on issues with schools that operate internationally.

- 1.3.11 RNCSF shall take all reasonable steps to ensure that Personal Data are not to transferred outside of the EEA without the employee being aware of the issues

2 Volunteers and Trustees

2.1 General

2.1.1 Volunteers includes anyone assisting RNCSF to fulfil its objectives and activities who is not paid for their services, this includes, trustees, members of the company limited by guarantee, people helping in offices and services etc.

2.2 Personal Data Held

2.2.1 All volunteers and trustees of RNCSF will have a file held by the CEO or their Manager. This file is held in hard copy and may include:

- Name;
- Date of Birth;
- Contact details;
- Address;
- Next of Kin.

2.3 Meeting the Requirements of Each Principle

2.3.1 Lawful

2.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the UK GDPR one of the Principles set out in Article 9 of the GDPR also applies.

2.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to volunteer Personal Data as a matter of law separate to the DPL.

2.3.1.3 The legal basis on which the Processing of volunteer Personal Data takes place is:

- (a) the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing is necessary for the trustee or the other volunteers to undertake their roles and the Processing which is undertaken by RNCSF fulfils its legitimate interest and does not interests are not overridden by the interests and freedoms afforded to the trustees and other volunteers – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle;
- (b) the Processing is necessary in order to protect the vital interests of the trustees and other volunteers – specifically this relates to the holding of some information such as dietary preferences where information on an underlying medical issue is not held.

- 2.3.1.4 The legal basis on which the Processing of trustee and other volunteer Special Categories of Personal Data is the Processing is carried out in the course of RNCSF's legitimate interests and with appropriate safeguards as a not-for-profit body with philosophical aims and only relates to the trustees as members of RNCSF and to volunteers as persons who have regular contact with RNCSF in connection with its purposes and the Personal Data are not disclosed outside of RNCSF without the consent of the Data Subjects. A legitimate interests assessment has been undertaken to confirm that this is an appropriate basis on which the Processing of Personal Data can be undertaken.
- 2.3.1.5 It may not be possible or appropriate to obtain consent from Trustees or other volunteers to the Processing of their Personal Data. In such cases an alternative lawful condition will be considered.
- 2.3.1.6 As a children's charity there is a requirement that all trustees are subject to Disclosure and Barring Service checks (**DBS Check**) prior to their appointment. Whilst there are generally restrictions in requiring a DBS Check the DPL allows this when a Member State makes specific provision for the protection of vulnerable people, which the UK has done in this case.
- 2.3.2 Fairness
- 2.3.2.1 RNCSF ensures that it operates fairly with trustees and other volunteers by providing the trustees and other volunteers the following information in its employee Data Subject Information Statement under Article 13 or 14 of the UKGDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;
 - (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
 - (d) all other information relevant to the Processing.
- 2.3.2.2 The statement provided to trustees is provided at Schedule 7 and the statement provided to other volunteers is provided at Schedule 13.

2.3.3 Transparent

2.3.3.1 RNCSF has developed this policy and the trustees and other volunteers Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to employees.

2.3.3.2 Information in the Policy is also included in the Volunteer Handbook and the information is reviewed regularly to ensure that it remains consistent. The CEO shall ensure that a review is undertaken of this Policy and the Volunteer Handbook on an annual basis to ensure that the information contained within is complementary and complete.

2.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for trustees and other volunteers.

2.3.4 Processing Purposes and Ancillary Use

2.3.4.1 The trustees and other volunteers' Personal Data are Processed for the following purposes:

- (a) engaging with you as a prospective, current and former volunteer for RNCSF, which includes maintaining effective governance of RNCSF and complying with RNCSF's safer recruitment policy;
- (b) administration in relation to the volunteering role that you undertake for RNCSF;
- (c) in respect of Trustees and members of the Advisory Board, publishing information about you on RNCSF's website and in relevant documentation produced by RNCSF;
- (d) providing you with information about the activities of RNCSF and its partners;
- (e) statutory and regulatory compliance;
- (f) processing any enquiries or complaints raised by or about you and responding to any communications from you;
- (g) transferring to third parties with whom we have a relationship
- (h) RNCSF may transfer the trustee and other volunteer Personal Data to the following organisations or category of organisations:
 - HMRC;

- our sub-contractors providing services to us, for example professional advisors, service providers, banks and other financial providers;
- donors;
- central and local government and their agencies;
- the Disclosure and Barring Service if we are required to undertake checks in relation to your suitability to undertake a designated role.

2.3.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all trustees and other volunteers.

2.3.4.3 The trustee and other volunteers Data Subject Information Statement is provided to the trustees and other volunteers on confirmation of their appointment. It can be updated within the scope of the DPL.

2.3.4.4 RNCSF may undertake Processing of Personal Data relating to trustees and other volunteers which is not included in the Data Subject Information Statement for trustees and other volunteers, however, this is only permitted where it is ancillary to one of the purposes specified.

2.3.4.5 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the trustees and other volunteers Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.

2.3.4.6 Disclosures other than specified in this Policy should be referred for legal advice, for example, police requests in relation to court proceedings or witness evidence.

2.3.4.7 RNCSF may Process trustees and other volunteers Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes.

2.3.5 Adequate, relevant and limited to what is necessary

2.3.5.1 RNCSF shall ensure that all trustees and other volunteers Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

- 2.3.5.2 RNCSF shall collect Personal Data from the trustees and other volunteers and any relevant referee and other third parties, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the trustees and other volunteers – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the trustees and other volunteers or the relevant third party.
 - 2.3.5.3 RNCSF shall only collect Personal Data which are relevant to the role that the trustee or other volunteer is undertaking.
 - 2.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to a trustee or other volunteer, such Personal Data shall be removed from the files and destroyed in a confidential manner or returned to the volunteer.
- 2.3.6 Accurate and, where necessary, kept up to date
- 2.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 2.3.6.2 RNCSF shall ensure that Personal Data added to any volunteer management system e.g. a volunteer Database or a spreadsheet is correctly entered and audited following entry and any errors corrected.
 - 2.3.6.3 RNCSF shall ask trustees and other volunteers on a regular basis with intervals of not less than 12 months and not more than 24 months to review all Personal Data held about them and to provide corrections.
 - 2.3.6.4 RNCSF shall in its Volunteer Handbook request all trustees and other volunteers to provide updated information to RNCSF as soon as any Personal Data changes, for example, the trustees and other volunteers moves home or the contact details for their next of kin changes.
 - 2.3.6.5 Where a trustee or other volunteer has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 2.3.7 Storage
- 2.3.7.1 RNCSF shall keep all employee Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.

2.3.7.2 Personal Data relating to trustees and other volunteers will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.

2.3.7.3 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.

Trustees and other volunteers may in some circumstances request that RNCSF no longer continue to Process their Personal Data.
RNCSF

2.3.8.1 RNCSF shall ensure that all trustee and other volunteer Personal Data are 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.

2.3.8.2 Any paper files relating to trustees will be kept:

- (a) by the CEO;
- (b) in locked cabinets that are only accessible by the authorised staff.

2.3.8.3 Any paper files relating to other volunteers will be kept:

- (a) by the office manager;
- (b) in locked cabinets that are only accessible by the authorised staff.

2.3.8.4 Any files held by managers outside of the CEO will be kept in locked cabinets, for example, by an employee responsible for managing the work of a volunteer or electronically in a secure encrypted computer file.

2.3.8.5 Any Personal Data that is stored within RNCSF's computer system is password protected.

- 2.3.8.6 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
 - 2.3.8.7 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
 - 2.3.8.8 No files shall be retained by RNCSF employees on home computers or in hard copy at home or otherwise outside of RNCSF's premises.
 - 2.3.8.9 Where Personal Data relating to volunteers is passed to trustees, this shall be done by sending to the trustees' RNCSF email account or by a secure document sharing service which does not permit the trustee to download to a system outside the control of RNCSF. This shall also apply to documents which may include Personal Data such as Board papers. This requirement is in line with the guidance issued by the Charity Commission and the ICO.
- 2.3.8 Volunteer Medical Records
- 2.3.9.1 RNCSF will generally not hold medical records on volunteers.
 - 2.3.9.2 If records are held as a result of the activities that are undertaken by the volunteers for RNCSF, the information shall be held securely by the CEO.
- 2.3.9 Monitoring
- 2.3.10.1 There are two main types of monitoring for volunteers of RNCSF:
 - (a) monitoring to ensure that RNCSF's equipment is not being misused; and
 - (b) statutory monitoring to ensure that a volunteer is not abusing someone in their care.
 - 2.3.10.2 RNCSF when monitoring email, telephone and internet usage ensures that it is compliant with the Regulation of Investigatory Powers Act 2000 (**RIPA**) and Telecommunications (Lawful Business Practice) Regulations 2000 (**LBP Regs**).
 - 2.3.10.3 All volunteer's charity email and internet usage may be monitored to ensure that a volunteer's personal use of email and internet remains at a minimum and does not interfere with the charity of RNCSF. For more information please see the Email and Internet Policy.
 - 2.3.10.4 Volunteers are also provided with notice of such monitoring in their subject information statements.
 - 2.3.10.5 Any monitoring of volunteers using CCTV shall be undertaken in accordance with the RNCSF CCTV monitoring policy.

2.3.10 Overseas Issues

2.3.11.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to the trustees and other volunteers. RNCSF works hard to ensure that this does not happen and draws the attention of the trustees and the other volunteers to circumstances where this can happen.

3 Contractors/Consultants/Agency Staff

3.1 General

- 3.1.1 RNCSF, where there is a specified business need, uses Agency staff, contractors and consultants (collectively known hereinafter as **Contractors**).
- 3.1.2 Where the contract is between RNCSF and the Agency, RNCSF will include an obligation on the Agent to procure that the Personal Data of the Contractors can be legally Processed by RNCSF and that Contractors will Process Personal Data given to them on RNCSF's Data Subjects in accordance with the DPL and RNCSF's data protection policy.
- 3.1.3 Where a contract is between the individual and RNCSF through a consultancy agreement, RNCSF will include an obligation on the Individual that any Personal Data is legally Processed in accordance with the DPL and RNCSF's data protection policy.
- 3.1.4 RNCSF will issue all Contractors with a copy of RNCSF's data protection policy upon start of work.
- 3.1.5 A Contractor is not an employee and will be a Data Processor, therefore the contract between a Contractor and RNCSF must include a data Processing clause. RNCSF will need to ensure that it is protected against any breaches of this Policy by the Contractor, through indemnities and restrictions on the Processing of Data.

3.2 Personal Data Held

- 3.2.1 Contractors to RNCSF will have a file held by the CEO. This file is held as either a hard copy or an electronic file and may include:
- Name and Date of Birth
 - Medical information
 - Contact details
 - Address
 - Next of Kin

3.3 Meeting the Requirements of Each Principle

3.3.1 Lawful

- 3.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the GDPR one of the Principles set out in Article 9 of the GDPR also applies.

3.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to consultant Personal Data as a matter of law separate to the DPL.

3.3.1.3 The legal basis on which the Processing of consultant Personal Data takes place is:

- (a) the contract between RNCSF and the consultant;
- (b) the protection of the consultant's vital interests, specifically in relation to health and safety and the protection of the consultant's health in accordance with Articles 6(1)(d) and 9(2)(c);
- (c) the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing is necessary for consultant to undertake their role and the Processing which is undertaken by RNCSF fulfils its legitimate interest and does not interests are not overridden by the interests and freedoms afforded to the consultants – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.

3.3.1.4 Generally, RNCSF will not be Processing Special Categories of Data in relation to Consultants. However, there are some circumstances, for example a medical issue relating to a consultant may be reported and recorded. In such cases this will usually have been provided by the Consultant and consent will have been provided by the provision of the information – the consultant could have decided not to disclose the information. However, where consent is not applicable RNCSF will be permitted to Process the Personal Data as the Processing is carried out in the course of RNCSF's legitimate interests and with appropriate safeguards as a not-for-profit body with philosophical aims and only relates to the someone in regular contact with RNCSF in connection with its purposes and the Personal Data are not disclosed outside of RNCSF without the consent of the Data Subjects. A legitimate interests assessment has been undertaken to confirm that this is an appropriate basis on which the Processing of Personal Data can be undertaken.

3.3.2 Fairness

3.3.2.1 RNCSF ensures that it operates fairly with consultants by providing the consultants the following information in its consultant Data Subject Information Statement under Article 13 or 14 of the UK GDPR:

- (a) the name of RNCSF as Data Controller;
- (b) the purposes/s for which the data are intended to be processed;

- (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
- (d) all other information relevant to the Processing.

3.3.3 Transparent

- 3.3.3.1 RNCSF has developed this policy and the consultant Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to consultants.
- 3.3.3.2 Information in the Policy is also included in the Employee Handbook and the information is reviewed regularly to ensure that it remains consistent. The CEO shall ensure that a review is undertaken of this Policy and the Employee Handbook on an annual basis to ensure that the information contained within is complementary and complete.
- 3.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for consultants.

3.3.4 Processing Purposes and Ancillary Use

- 3.3.4.1 The consultant's Personal Data are Processed for the following purposes:
 - (a) determining whether or not you will become a contractor of the Charity;
 - (b) performing the contract for services between you and the Charity;
 - (c) administration in relation to the services that you provide for the Charity;
 - (d) statutory and regulatory compliance;
 - (e) providing you with information about the activities of the Charity and its partners; and
 - (f) processing any enquiries or complaints raised by or about you and responding to any communications from you;
 - (g) where RNCSF are required to do so, confirming the consultant's suitability and continued suitability for the work that they carry out, including any checks and updates that are required to be made by RNCSF or any other body:
 - with the Disclosure and Barring Service which may result in RNCSF retaining information about criminal convictions;

- in connection with your health including screening and making decisions based on any health records which may be collected by, or transferred to, RNCSF;
- (h) RNCSF may transfer the consultant's Personal Data to the following organisations or category of organisations:
- HMRC;
 - our sub-contractors providing services to us, for example payroll, pension providers, professional advisors, providers of consultant benefits;
 - central and local government and their agencies;
 - the Disclosure and Barring Service if we are required to undertake checks in relation to your suitability to undertake a designated role.
- 3.3.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all consultants.
- 3.3.4.3 The consultant Data Subject Information Statement is provided to the consultants with their employment contract. It is not part of their employment contract, and can be updated within the scope of the DPL, but is provided so that the consultant is aware of the Processing at the same time they are reviewing their contract of employment.
- 3.3.4.4 RNCSF may undertake Processing of Personal Data relating to consultants which is not included in the Data Subject Information Statement for consultants, however, this is only permitted where it is ancillary to one of the purposes specified.
- 3.3.4.5 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the consultant Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.
- 3.3.4.6 Disclosures other than specified in this Policy should be referred for legal advice, for example, police requests in relation to court proceedings or witness evidence.
- 3.3.4.7 RNCSF may Process consultant Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes.

- 3.3.5 Adequate, relevant and limited to what is necessary
- 3.3.5.1 RNCSF shall ensure that all consultant Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - 3.3.5.2 RNCSF shall collect Personal Data from the consultant and any relevant referee and other third parties, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the consultant – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the consultant or the relevant third party.
 - 3.3.5.3 RNCSF shall only collect Personal Data which are relevant to the role that the consultant is undertaking.
 - 3.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to a consultant, such Personal Data shall be removed from the files and destroyed in a confidential manner or returned to the consultant.
- 3.3.6 Accurate and, where necessary, kept up to date
- 3.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 3.3.6.2 RNCSF shall ensure that Personal Data added to any contract management system or spreadsheet is correctly entered and audited following entry and any errors corrected.
 - 3.3.6.3 RNCSF shall ask consultants on a regular basis with intervals of not less than 12 months and not more than 24 months to review all PersonalData held about them and to provide corrections.
 - 3.3.6.4 RNCSF shall in its contract with the consultant request all consultants to provide updated information to RNCSF as soon as any Personal Datachanges, for example, the consultant moves home.
 - 3.3.6.5 Where a consultant has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 3.3.7 Storage
- 3.3.7.1 RNCSF shall keep all consultant Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.

- 3.3.7.2 Personal Data relating to consultants may be stored by RNCSF for longer periods than is strictly necessary insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the UK GDPR .
- 3.3.7.3 An Employee's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
- 3.3.7.4 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.
- 3.3.7.5 Employees may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court.
- 3.3.8 Security
- 3.3.8.1 RNCSF shall ensure that all consultant Personal Data are 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.
- 3.3.8.2 Any paper files will be kept:
- (a) by the CEO;
 - (b) in locked cabinets that are only accessible by the authorised staff.
- 3.3.8.3 Any files held by managers outside of the CEO will be kept in locked cabinets and the CEO shall be informed of all such files and their location.
- 3.3.8.4 Any Personal Data that is stored within RNCSF's computer system is password protected.
- 3.3.8.5 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
- 3.3.8.6 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
- 3.3.8.7 No files shall be retained by RNCSF consultants on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

3.3.9 Monitoring

3.3.9.1 There are two main types of monitoring for consultants of RNCSF:

- (a) monitoring to ensure that RNCSF's equipment is not being misused; and
- (b) statutory monitoring to ensure that a consultant is not abusing someone in their care.

3.3.9.2 RNCSF when monitoring the charity email, telephone and internet usage ensures that it is compliant with the Regulation of Investigatory Powers Act 2000 (**RIPA**) and Telecommunications (Lawful Business Practice) Regulations 2000 (**LBP Regs**).

3.3.9.3 All consultants' charity email and internet usage may be monitored to ensure that a consultant's personal use of email and internet remains at a minimum and does not interfere with the charity of RNCSF. For more information please see the Email and Internet Policy.

3.3.9.4 Employees are also provided with notice of such monitoring in their subject information statements.

3.3.9.5 Any monitoring of consultants using CCTV shall be undertaken in accordance with the RNCSF CCTV monitoring policy.

3.3.10 Overseas Issues

3.3.10.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to the consultants. RNCSF works hard to ensure that this does not happen and draws the attention of the consultants to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the consultant being aware of the issues.

4 Applicants

4.1 General

- 4.1.1 RNCSF makes bursaries available to a number of children in each year. The children are either referred from a school, a partner organisation or result as a direct application.
- 4.1.2 Prior to an award being made, the child and the child's parents or guardians are applicants. If they are successful, the child will become a supported child and the parents will be the parents of a supported child and their Personal Data shall be Processed under those categories. Until a determination is made the child and the parents/guardians Personal Data will be Processed collectively as "Applicants".
- 4.1.3 Where an application is made by a social worker or a person at a school on behalf of the child, the application will be considered to be a "Virtual School Application". A virtual school application shall be in the same form as an application, however, the communications from RNCSF are slightly different. When referring to an applicant in this section it shall include a virtual school application and a reference to applicant shall also include the referring person.

4.2 Personal Data Held

- 4.2.1 Each applicant will have a file maintained by RNCSF under the control of the Deputy CEO.
- 4.2.2 This file is held as either a hard copy or an electronic file and may include:
- Name and Date of Birth of the Child and parents/guardians or the referrer;
 - Medical information of the child and parents/guardians;
 - Contact details;
 - Address;
 - Racial or ethnic origin;
 - Religious belief;
 - Biographical information;
 - Trade Union membership;
 - Sexual orientation.

4.3 Meeting the Requirements of Each Principle

- 4.3.1 Lawful
- 4.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the UK GDPR one of the Principles set out in Article 9 of the GDPR also applies.

- 4.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to applicant Personal Data as a matter of law separate to the DPL.
- 4.3.1.3 The legal basis on which the Processing of applicant Personal Data takes place is the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing is necessary for an applicant to be assessed as to whether a bursary award can be made and the Processing which is undertaken by RNCSF fulfils its legitimate interest and the applicant's interests are not overridden by the interests and freedoms afforded to the applicants – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.
- 4.3.1.4 RNCSF also obtains the consent of the applicants to send some materials to the applicants by electronic means, using information about RNCSF and to those applicants that have signed up to receive update information.
- 4.3.1.5 RNCSF also Processes Special Categories of Data in relation to applicants. Without the Special Categories of Personal Data being provided RNCSF will not be able to assess the application and make a decision in relation to the award of a bursary. Therefore, consent will not be able to be freely given. However, RNCSF will be permitted to Process the Personal Data as the Processing is carried out in the course of RNCSF's legitimate interests and with appropriate safeguards as a not-for-profit body with philosophical aims. The applicants are in regular contact with RNCSF in connection with its purposes from the point of application and the Personal Data are not disclosed outside of RNCSF without the consent of the Data Subjects. A legitimate interests assessment has been undertaken to confirm that this is an appropriate basis on which the Processing of Personal Data can be undertaken.
- 4.3.1.6 Where consents are sought, they are requested in the relevant application forms for bursaries. However, please note that if they are not provided the application cannot proceed. Therefore, consent is only used where information is not required for the purposes of making a decision on the application.
- 4.3.2 Fairness
- 4.3.2.1 RNCSF ensures that it operates fairly with applicants by providing the applicants the following information in its applicant Data Subject Information Statement under Article 13 or 14 of the UK GDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;

(c) information on the rights and freedoms granted to the Data Subject by the DPL; and

(d) all other information relevant to the Processing.

4.3.2.2 The template statement for applicants including parents and guardian is provided at Schedule 8 and the template statement for virtual school applications is provided at Schedule 11.

4.3.2.3 The statement must be sent to applicants, either as part of the application pack or in response to the receipt of an application.

4.3.2.4 The statement will also be added to the RNCSF website so that applicants can review online should they need any update. Any applicant may request a copy from RNCSF and RNCSF shall either provide a copy or direct them to the appropriate statement on the RNCSF website.

4.3.3 Transparent

4.3.3.1 RNCSF has developed this policy and the applicant Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to applicants.

4.3.3.2 Information on how Personal Data relating to applicant's is processed is included in the notes supporting the application for a bursary.

4.3.3.3 Where the child seeking a bursary is under the age of 13, the statement is only provided to their parents/guardians. However, where the child seeking a bursary is 13 or older, the statement is provided to the child and their parents / guardians.

4.3.3.4 The CEO will consider not less than every 24 months that this policy remains transparent for applicants.

4.3.4 Processing Purposes and Ancillary Use

4.3.4.1 The applicant's Personal Data are Processed for the following purposes:

- reviewing your application to evaluate whether you meet the criteria for support;
- managing the application process;
- working with schools and other organisations providing support to see if it is possible to provide you with support;
- providing schools with information to evaluate whether you will be able to attend the school if funding is provided;

- providing you with information about the activities of the Charity and its partners;
- statutory and regulatory compliance;
- managing any enquiries or complaints raised by you and responding to any communications from you; and
- (if permitted) sending electronic marketing communications to you keeping you informed about the activities falling into any of the above categories.

4.3.4.2 It may also be necessary for RNCSF to transfer Personal Data relating to the applicants to third parties, specifically the schools that will be educating the child if the application is successful. If consent is refused the applicant cannot progress providing additional support for the application

4.3.4.3 The purposes are set out in the Data Subject Information Statement which is issued to all applicants.

4.3.4.4 The applicant Data Subject Information Statement is provided to the applicants with the application pack.

4.3.4.5 RNCSF may undertake Processing of Personal Data relating to applicants which is not included in the Data Subject Information Statement for applicants, however, this is only permitted where it is ancillary to one of the purposes specified.

4.3.4.6 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the applicant Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.

4.3.4.7 RNCSF may Process applicant Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes. Generally maintaining a record of those supported by RNCSF will fall within the historical research purposes in accordance with Article 89.

4.3.5 Adequate, relevant and limited to what is necessary

4.3.5.1 RNCSF shall ensure that all applicant Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that is to make a decision on the award of a bursary.

- 4.3.5.2 RNCSF shall collect Personal Data from the applicant, the supporting partner organisation and any relevant referee and other third parties, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the applicant – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the applicant or the relevant third party.
 - 4.3.5.3 RNCSF shall only collect Personal Data which are relevant to the application for a bursary award.
 - 4.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to an applicant, such Personal Data shall be removed from the files and destroyed in a confidential manner or returned to the applicant.
- 4.3.6 Accurate and, where necessary, kept up to date
- 4.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 4.3.6.2 RNCSF shall ensure that Personal Data added to any database or spreadsheet of applicants is correctly entered and audited following entry and any errors corrected.
 - 4.3.6.3 Where an award is not made, the application will be kept for at least seven years. The applicant will be asked to keep information up to date. However, RNCSF will not take active steps to contact the applicants to check the information is still up to date.
 - 4.3.6.4 RNCSF will be required to keep applicants Personal Data to ensure that such applications are available for future applications from the same applicants or in relation to different children of the same parents/guardians. Therefore, the right of erasure will not be available.
 - 4.3.6.5 Where an applicant has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 4.3.7 Storage
- 4.3.7.1 RNCSF shall keep all applicant Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.

- 4.3.7.2 Personal Data relating to applicants may be stored by RNCSF for longer periods than is strictly necessary insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR .
- 4.3.7.3 An applicant's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
- 4.3.7.4 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data. Unless the Personal Data is being retained for historical reasons.
- 4.3.7.5 Applicants may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court.
- 4.3.8 Security
- 4.3.8.1 RNCSF shall ensure that all applicant Personal Data are 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.
- 4.3.8.2 Any paper files will be kept:
- (a) by the Deputy CEO;
 - (b) in locked cabinets that are only accessible by the authorised staff.
- 4.3.8.3 Any files held by other members of staff will be kept in locked cabinets and the Deputy CEO shall be informed of all such files and their location.
- 4.3.8.4 Any Personal Data that is stored within RNCSF's computer system is password protected.
- 4.3.8.5 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
- 4.3.8.6 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
- 4.3.8.7 No files shall be retained by RNCSF applicants on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

4.3.9 Overseas Issues

- 4.3.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to the applicants. RNCSF works hard to ensure that this does not happen and draws the attention of the applicants to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the applicants being aware of the issues.

5 Supported Young People

5.1 General

5.1.1 Supported young people are those who have applied for and been awarded a bursary to attend a boarding school as an RNCSF pupil.

5.1.2 Where a supported young person is under the age of 13, all data protection matters will be arranged between their parents/guardians and RNCSF. Where the supported young person is aged 13 or over data protection matters will be arranged with them directly.

5.2 Personal Data Held

5.2.1 Each supported young person will have a file maintained by RNCSF under the control of the Deputy CEO.

5.2.2 This file is held as either a hard copy or an electronic file and may include:

- Name and Date of Birth of the child;
- Medical information of the child;
- Contact details;
- Address;
- Racial or ethnic origin;
- Religious belief;
- Biographical information;
- Sexual orientation.

5.3 Meeting the Requirements of Each Principle

5.3.1 Lawful

5.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the GDPR one of the Principles set out in Article 9 of the GDPR also applies.

5.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to supported young people Personal Data as a matter of law separate to the DPL.

- 5.3.1.3 The legal basis on which the Processing of supported young people Personal Data takes place is the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing is necessary for the supported young person to receive the bursary and the Processing which is undertaken by RNCSF fulfils its legitimate interest and the supported young person's interests are not overridden by the interests and freedoms afforded to the supported young person – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.
- 5.3.1.4 RNCSF also obtains the consent of the supported young person to send some materials to the supported young people by electronic means, using information about RNCSF and to those supported young people that have signed up to receive update information.
- 5.3.1.5 RNCSF also Processes Special Categories of Data in relation to supported young people. Without the Special Categories of Personal Data being provided RNCSF will not be able to support the young person and provide the bursary. RNCSF always uses Explicit Consent or an exemption according to the DPA to process such information. RNCSFRNCSFRNCSFRNCSF
- 5.3.1.6 Where consents are sought, they are requested in the relevant acceptance for the bursaries.
- 5.3.2 Fairness
- 5.3.2.1 RNCSF ensures that it operates fairly with the supported young persons by providing the supported young persons the following information in its supported young person Data Subject Information Statement under Article 13 or 14 of the GDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;

- (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
- (d) all other information relevant to the Processing.

5.3.2.2 The template statement for supported young persons is provided at Schedule 5.

5.3.3 Transparent

5.3.3.1 RNCSF has developed this policy and the supported young person DataSubject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to the supported young persons.

5.3.3.2 Information on how Personal Data relating to the supported young person's is processed is set out in the supported young person data subject information statement.

5.3.3.3 Where the supported young person is under the age of 13, the statement is only provided to their parents/guardians. However, where the supported young person is 13 or older, the statement is provided only to the supported young person.

5.3.3.4 The CEO will consider not less than every 24 months that this policy remains transparent for supported young people.

5.3.4 Processing Purposes and Ancillary Use

5.3.4.1 The supported young person's Personal Data are Processed for the following purposes:

- providing the supported young person with a bursary and assistance with their schooling, pastoral care and associated activities;
- providing the school which the supported young person is attending with information about the supported young person and the support being provided in order to maintain their place at the school;
- where applicable, providing the partner charity or organisation which also supports the supported young person with information about you;
- providing the supported young person with information about the activities of the Charity and its partners;
- administration in relation to the support provided by the Charity;

- statutory and regulatory compliance;
- managing any enquiries or complaints raised by the supported young person u and responding to any communications from the supported young person;
- providing an alumni group which the supported young person can access; and
- (if permitted as set out in Paragraph 2.3 below) sending electronic marketing communications to you keeping you informed about the Data Protection Act 2018 activities falling into any of the above categories.

5.3.4.2 It may also be necessary for RNCSF to transfer Personal Data relating to the supported young persons to third parties, specifically the schools that will be educating the child if the application is successful. If consent is refused the supported young person cannot progress providing additional support for the application

5.3.4.3 The purposes are set out in the Data Subject Information Statement which is issued to all supported young persons.

5.3.4.4 The supported young person Data Subject Information Statement is provided to the supported young persons with the award information.

5.3.4.5 RNCSF may undertake Processing of Personal Data relating to a supported young person which is not included in the Data Subject Information Statement for supported young persons, however, this is only permitted where it is ancillary to one of the purposes specified.

5.3.4.6 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the supported young person Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.

5.3.4.7 RNCSF may Process supported young person Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes. Generally maintaining a record of those supported by RNCSF will fall within the historical research purposes in accordance with Article 89.

- 5.3.5 Adequate, relevant and limited to what is necessary
- 5.3.5.1 RNCSF shall ensure that all supported young person Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that is to support the operation of the bursary.
 - 5.3.5.2 RNCSF shall collect Personal Data from the supported young person, the supporting partner organisation and any relevant referee and other third parties, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the supported young person – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the supported young person or the relevant third party.
 - 5.3.5.3 RNCSF shall only collect Personal Data which are relevant to the operation of the bursary award and the support of the supported young person.
 - 5.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to a supported young person, such Personal Data shall be removed from the files and destroyed in a confidential manner or returned to the supported young person.
- 5.3.6 Accurate and, where necessary, kept up to date
- 5.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 5.3.6.2 RNCSF shall ensure that Personal Data added to any database or spreadsheet of supported young persons is correctly entered and audited following entry and any errors corrected.
 - 5.3.6.3 RNCSF will continue to Process Personal Data relating to supported young people at least until they reach the age of 25. Processing may continue to the supported young person remains part of the alumni association within RNCSF. The supported young person will be asked to keep information up to date. However, RNCSF will also regularly take steps each to confirm that the Personal Data that is holds is accurate, usually by requesting a review on an annual basis.
 - 5.3.6.4 Where a supported young person has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.

- 5.3.7 Storage
- 5.3.7.1 RNCSF shall keep all supported young person Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.
- 5.3.7.2 Personal Data relating to supported young persons may be stored by RNCSF for longer periods where this is necessary insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR .
- 5.3.7.3 A supported young person's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
- 5.3.7.4 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data. Unless the Personal Data is being retained for historical reasons.
- 5.3.7.5 Supported young people may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court.
- 5.3.8 Security
- 5.3.8.1 RNCSF shall ensure that all supported young person Personal Data are 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.
- 5.3.8.2 Any paper files will be kept:
- (a) by the Deputy CEO;
 - (b) in locked cabinets that are only accessible by the authorised staff.
- 5.3.8.3 Any files held by other members of staff will be kept in locked cabinets and the Deputy CEO shall be informed of all such files and their location.
- 5.3.8.4 Any Personal Data that is stored within RNCSF's computer system is password protected.

- 5.3.8.5 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
 - 5.3.8.6 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
 - 5.3.8.7 No files shall be retained by RNCSF relating to supported young people on home computers or in hard copy at home or otherwise outside of RNCSF's premises.
- 5.3.9 Overseas Issues
- 5.3.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to employees. RNCSF works hard to ensure that this does not happen and draws the attention of the supported young people to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the supported young person being aware of the issues.

6 Supported Parents and Guardians

6.1 General

6.1.1 Supported parents and/or guardians and the parents or guardians of the supported young people, i.e. those responsible for the children receiving a bursary to attend a boarding school as an RNCSF pupil.

6.2 Personal Data Held

6.2.1 Each supported young person will have a file maintained by RNCSF under the control of the Deputy CEO. The supported parent and/or guardian information will remain in that file.

6.2.2 This file is held as either a hard copy or an electronic file and may include:

- Name and Date of Birth of the child;
- Medical information of the child;
- Contact details;
- Address;
- Racial or ethnic origin;
- Religious belief;
- Biographical information;
- Trade Union membership;
- Sexual orientation.

6.3 Meeting the Requirements of Each Principle

6.3.1 Lawful

6.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the GDPR one of the Principles set out in Article 9 of the GDPR also applies.

6.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to parent and guardian Personal Data as a matter of law separate to the DPL.

6.3.1.3 The legal basis on which the Processing of parents and guardians Personal Data takes place is the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing is necessary for the parents and guardians to receive the bursary for their children and the Processing which is undertaken by RNCSF fulfils its legitimate interest and the interests of the parents and guardians are not overridden by the interests and freedoms afforded to the parents and guardians
– a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.

- 6.3.1.4 RNCSF may also obtains the consent of the parents and guardians to send some materials to the parents and guardians by electronic means, using information about RNCSF and to those parents and guardians that have signed up to receive update information.
- 6.3.1.5 RNCSF also Processes Special Categories of Data in relation to parents and guardians. Without the Special Categories of Personal Data being provided RNCSF will not be able to support the parents and guardians and provide the bursary. Therefore, consent will not be able to be freely given. However, RNCSF will be permitted to Process the Personal Data as the Processing is carried out in the course of RNCSF's legitimate interests and with appropriate safeguards as a not-for-profit body with philosophical aims. The parents and guardians are in regular contact with RNCSF in connection with its purposes as the child is receiving the bursary benefits and the Personal Data are not disclosed outside of RNCSF without the consent of the Data Subjects. As data may need to be shared with the school and in some cases the partner organisation proposing the supported young person consent is obtained from the parents and guardians – if the data are not shared the school and the partner organisation will need to seek the Personal Data directly from the parents and guardians. A legitimate interests assessment has been undertaken to confirm that this is an appropriate basis on which the Processing of Personal Data can be undertaken.
- 6.3.1.6 Where consents are sought, they are requested in the relevant acceptance for the bursaries.
- 6.3.2 Fairness
- 6.3.2.1 RNCSF ensures that it operates fairly with the parents and guardians by providing the parents and guardians the following information in its parent and guardian Data Subject Information Statement under Article 13 or 14 of the GDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;
 - (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
 - (d) all other information relevant to the Processing.
- 6.3.2.2 The template statement for parents and guardians is provided at Schedule 10.

6.3.3 Transparent

6.3.3.1 RNCSF has developed this policy and the parents and guardians Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to the parents and guardians.

6.3.3.2 Information on how Personal Data relating to the parents and guardians is processed is set out in the supported parents and guardians data subject information statement.

6.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for parents and guardians.

6.3.4 Processing Purposes and Ancillary Use

6.3.4.1 The parent and guardian's Personal Data are Processed for the following purposes:

- providing the parents and guardians with a bursary and assistance with their child's schooling, pastoral care and associated activities;
- providing the school which the parents and guardians child is attending with information about the parents and guardians and the support being provided in order to maintain their child's place at the school;
- providing the parents and guardians with information about the activities of the Charity and its partners;
- administration in relation to the support provided by the Charity;
- statutory and regulatory compliance;
- managing any enquiries or complaints raised by the parents and guardians and responding to any communications from the parents and guardians;
- providing an alumni group which the parents and guardians can access; and
- sending electronic marketing communications to the parents and guardians keeping them informed about the Data Protection Act 2018 activities falling into any of the above categories.

- 6.3.4.2 It may also be necessary for RNCSF to transfer Personal Data relating to the parents and guardians to third parties, specifically the schools that will be educating the child if the application is successful. If consent is refused the supported young person cannot progress providing additional support for the application
 - 6.3.4.3 The purposes are set out in the Data Subject Information Statement which is issued to all parents and guardians.
 - 6.3.4.4 The parents and guardians Data Subject Information Statement is provided to the parents and guardians with the award information this replaces the statement provided to applicants.
 - 6.3.4.5 RNCSF may undertake Processing of Personal Data relating to a parents and guardians which is not included in the Data Subject Information Statement for parents and guardians, however, this is only permitted where it is ancillary to one of the purposes specified.
 - 6.3.4.6 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the parents and guardians Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.
 - 6.3.4.7 RNCSF may Process parent and guardian Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes. Generally maintaining a record of those supported by RNCSF will fall within the historical research purposes in accordance with Article 89.
- 6.3.5 Adequate, relevant and limited to what is necessary
- 6.3.5.1 RNCSF shall ensure that all parent and guardian Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that is to support the operation of the bursary.
 - 6.3.5.2 RNCSF shall collect Personal Data from the parent or guardian, the supported young person, the supporting partner organisation and any relevant referee and other third parties, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the supported young person – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the parent or guardian or the relevant third party.

- 6.3.5.3 RNCSF shall only collect Personal Data which are relevant to the operation of the bursary award and the support of the supported young person as far as this relates to the parent and guardian.
 - 6.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to parents and guardians, such Personal Data shall be removed from the files and destroyed in a confidential manner or returned to the parents and guardians.
- 6.3.6 Accurate and, where necessary, kept up to date
- 6.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 6.3.6.2 RNCSF shall ensure that Personal Data added to any database or spreadsheet of parents and guardians is correctly entered and audited following entry and any errors corrected.
 - 6.3.6.3 The parents and guardians will be asked to keep information up to date. However, RNCSF will also take steps each to confirm that the Personal Data that it holds is accurate, usually by requesting a review on an annual basis. Updates will stop once the child has reached the age of 18 when references to the parents and guardians will no longer be required. Their Personal Data may be retained for up to 7 years following this date and may be retained in historical form for longer without being updated.
 - 6.3.6.4 Where a parent or guardian has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 6.3.7 Storage
- 6.3.7.1 RNCSF shall keep all parent and guardian Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data. The parent and guardian information will be stored in a manner which makes it accessible should it be requested by the parent or guardian, but will most likely be associated to the supported young person and will not be a separate file.
 - 6.3.7.2 Personal Data relating to parents and guardians may be stored by RNCSF for longer periods than is strictly necessary insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR.

- 6.3.7.3 Parent and guardian's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
- 6.3.7.4 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data. Unless the Personal Data is being retained for historical reasons.
- 6.3.7.5 Parents and guardians may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court.
- 6.3.8 Security
- 6.3.8.1 RNCSF shall ensure that all parent and guardian Personal Data are 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.
- 6.3.8.2 Any paper files will be kept:
- (a) by the Deputy CEO;
 - (b) in locked cabinets that are only accessible by the authorised staff.
- 6.3.8.3 Any files held by other members of staff will be kept in locked cabinets and the Deputy CEO shall be informed of all such files and their location.
- 6.3.8.4 Any Personal Data that is stored within RNCSF's computer system is password protected.
- 6.3.8.5 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
- 6.3.8.6 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
- 6.3.8.7 No files shall be retained by RNCSF on parents or guardians on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

6.3.9 Overseas Issues

- 6.3.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to parents and guardians. RNCSF works hard to ensure that this does not happen and draws the attention of the parents and guardians to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the parents and guardians being aware of the issues.

7 Supporters and Donors

7.1 General

7.1.1 RNCSF Processes Personal Data of its supporters and donors; these will include Personal Data relating to those individuals who donate to RNCSF or who otherwise support RNCSF.

7.2 Description of Data

7.2.1 The Personal Data Processed in relation to supporters and donors may include:

- Name;
- Contact details;
- Address;
- Date of Birth;
- Biographical information;
- Next of Kin;
- Complaints and enquiries.

7.3 Personal Data Held

7.3.1 RNCSF Processes Personal Data on all donors and supporters. It only holds electronic files on donors and supporters and each electronic file and may include:

- Name and Date of Birth;
- Contact details;
- Address;
- Racial or ethnic origin;
- Biographical information.

7.4 Meeting the Requirements of Each Principle

7.4.1 Lawful

7.4.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the GDPR one of the Principles set out in Article 9 of the GDPR also applies.

7.4.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to supporter and donor Personal Data as a matter of law separate to the DPL.

- 7.4.1.3 The legal basis on which the Processing of supporter and donor Personal Data to be undertaken is the legitimate interests of RNCSF (Article 6(1)(f)) in that it is necessary for RNCSF to raise funds to support its charitable purposes and the Processing which is undertaken by RNCSF fulfils its legitimate interest and the interests of the supporters and donors are not overridden by the interests and freedoms afforded to the supporters and donors – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.
- 7.4.1.4 RNCSF also obtains the consent of the supporters and donors to send some materials to the supporters and donors by electronic means, using information about RNCSF and to those supporters and donors that have signed up to receive update information.
- 7.4.1.5 RNCSF also Processes Special Categories of Data in relation to supporters and donors. It seeks the explicit consent of supporters and donors to Process Special Categories of Data about supporters and donors and does not transfer the Personal Data which is Processed to third parties
- 7.4.1.6 Where consents are sought, they are requested in writing by the fundraising team.
- 7.4.2 Fairness
- 7.4.2.1 RNCSF ensures that it operates fairly with the supporters and donors by providing the supporters and donors the following information in its supporters and donors Data Subject Information Statement under Article 13 or 14 of the UK GDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;
 - (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
 - (d) all other information relevant to the Processing.
- 7.4.2.2 The template statement for supporters and donors is provided at Schedule 12.
- 7.4.3 Transparent
- 7.4.3.1 RNCSF has developed this policy and the supporters and donors Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to the supporters and donors.

7.4.3.2 Information on how Personal Data relating to the supporters and donors is processed is set out in the supported supporters and donors data subject information statement.

7.4.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for supporters and donors.

7.4.4 Processing Purposes and Ancillary Use

7.4.4.1 The supporters and donor's Personal Data are Processed for the following purposes:

- acknowledging and processing any financial or other donations provided by supporters and donors;
- future fundraising;
- providing supporters and donors with information about the activities of the Charity and its partners;
- administration in relation to the support that supporters and donors provide to the Charity;
- statutory and regulatory compliance;
- processing any enquiries or complaints raised by supporters and donors and responding to any communications from supporters and donors;
- transferring to third parties with whom we have a relationship in respect of our fundraising activities, such as service providers;
- transferring supporters and donors Personal Data to HMRC in respect of any Gift Aid claims; and
- sending electronic marketing communications to donors and supporters keeping them informed about data protection activities falling into any of the above categories.

7.4.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all donors and supporters.

7.4.4.3 The donors and supporters Data Subject Information Statement is provided to the donors and supporters as a result of first contact or as a result of a donation being made whichever arises first.

7.4.4.4 RNCSF may undertake Processing of Personal Data relating to a donors and supporters which is not included in the Data Subject Information Statement for donors and supporters, however, this is only permitted where it is ancillary to one of the purposes specified.

- 7.4.4.5 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the donors and supporters Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.
- 7.4.4.6 It is unlikely that RNCSF will be able to continue to Process donor and supporter Personal Data for historical research purposes or statistical purposes, in accordance with Article 89(1) of the GDPR following the end of the relationship and the period from which there is no legal requirement to retain the data.
- 7.4.5 Adequate, relevant and limited to what is necessary
- 7.4.5.1 RNCSF shall ensure that all donor and supporter Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that is to support the operation of RNCSF and to raise funds and support.
- 7.4.5.2 RNCSF shall collect Personal Data from the donors and supporters and any referring party, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the donors and supporters – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the donor or supporter.
- 7.4.5.3 RNCSF shall only collect Personal Data which are relevant to the operation of the fundraising and support programme.
- 7.4.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to donors and supporters, such Personal Data shall be removed from the files and destroyed in a confidential manner.
- 7.4.6 Accurate and, where necessary, kept up to date
- 7.4.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
- 7.4.6.2 RNCSF shall ensure that Personal Data added to any fundraising database is correctly entered and audited following entry and any errors corrected.
- 7.4.6.3 The donors and supporters will be asked to keep information up to date. However, RNCSF will also take steps each to confirm that the Personal Data that it holds is accurate, usually by requesting a review on a triannual basis.

- 7.4.6.4 Personal Data of donors and supporters will be retained for up to 7 years following the final donation as this is required for the financial records of RNCSF.
- 7.4.6.5 Where a donor and supporter has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 7.4.7 Storage
 - 7.4.7.1 RNCSF shall keep all donor and supporter Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.
 - 7.4.7.2 Supporter and donor's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
 - 7.4.7.3 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.
 - 7.4.7.4 Donors and supporters may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court. For example, whilst RNCSF may cease to Process Personal Data for marketing purposes on request, it will need to hold Personal Data in respect of donations for at least 7 years following the donation in case of a Gift Aid audit or queries from HMRC.
- 7.4.8 Security
 - 7.4.8.1 RNCSF shall ensure that all donors and supporters Personal Data are 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.
 - 7.4.8.2 RNCSF shall not keep paper files on donors.
 - 7.4.8.3 All Personal Data that is stored within RNCSF's computer system is password protected.
 - 7.4.8.4 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.

- 7.4.8.5 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.

7.4.8.6 No files shall be retained by RNCSF on supports and donors on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

7.4.9 Overseas Issues

7.4.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to donors and supporters.

7.4.9.2 RNCSF works hard to ensure that this does not happen and draws the attention of the donors and supporters to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the donors and supporters being aware of the issues and consenting where necessary.

7.5 Electronic Marketing

7.5.1 Under the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003, it is a requirement that consent is obtained prior to sending electronic marketing information to individuals.

7.5.2 Therefore, whenever RNCSF collects email addresses it seeks to obtain the necessary consent to send electronic marketing emails. The consent text is as follows:

“By providing Royal National Children's SpringBoard Foundation (**RNCSF**) with your email address you are consenting to RNCSF sending you information about RNCSF and its activities, including for the purposes of fundraising and marketing.”

8 Individuals Associated with Partner Organisations

8.1 General

- 8.1.1 RNCSF Processes Personal Data of employees and volunteers of its partner organisations, these individuals support children and families through the application process for a bursary and then through their time at school.
- 8.1.2 RNCSF also Processes Personal Data of employees at schools where pupils are placed following receipt of an RNCSF bursary. RNCSF ensures that there are trained key contacts at each school to ensure that pupils are properly supported, and that the pupil is able to properly benefit from the bursary experience.
- 8.1.3 Together these individuals are referred to as Partner Workers in this section of this policy.

8.2 Description of Data

- 8.2.1 The Personal Data Processed in relation to partner workers may include:
- Name;
 - Contact details;
 - Address;
 - Date of Birth;
 - Biographical information;
 - Next of Kin;
 - Complaints and enquiries.

8.3 Meeting the Requirements of Each Principle

- 8.3.1 Lawful
- 8.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the UK GDPR one of the Principles set out in Article 9 of the GDPR also applies.
- 8.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to partner workers Personal Data as a matter of law separate to the DPL.
- 8.3.1.3 The legal basis on which the Processing of partner workers Personal Data to be undertaken is the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing which is undertaken by RNCSF fulfils its legitimate interest and the interests of the partner workers are not overridden by the interests and freedoms afforded to the partner workers – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.

- 8.3.1.4 Specifically, RNCSF is Processing partner worker Personal Data to ensure that the children in supports through bursaries are supported in both their community and at school, consent is not an appropriate principle on which to basis the Processing as if consent is not provided to Process the Personal Data RNCSF will not be able to appoint the partner worker. The Processing which is undertaken usually relates to the operation of the partner worker in the professional life and the Processing of their Personal Data is limited to ensuring that they are suitable to undertake the role to which they have been appointed.
- 8.3.1.5 The legal basis on which the Processing of partner worker Special Categories of Personal Data is the Processing is carried out in the course of RNCSF's legitimate interests and with appropriate safeguards as a not-for-profit body with philosophical aims and only relates to the trustees as members of RNCSF and to volunteers as persons who have regular contact with RNCSF in connection with its purposes and the Personal Data are not disclosed outside of RNCSF without the consent of the Data Subjects. A legitimate interests assessment has been undertaken to confirm that this is an appropriate basis on which the Processing of Personal Data can be undertaken.
- 8.3.1.6 Specifically, the partner workers are involved with the delivery of the RNCSF bursary aim and are closely connected to RNCSF. If consent is not provided to the Processing of their Special Categories of Data, they cannot undertake their role, so consent is not freely given and the legitimate interests principle applies.
- 8.3.1.7 RNCSF also obtains the consent of the partner workers to send some materials to the partner workers by electronic means, using information about RNCSF and to those partner workers that have signed up to receive update information.
- 8.3.1.8 Where consents are sought, they are requested in writing by the bursary team.
- 8.3.2 Fairness
- 8.3.2.1 RNCSF ensures that it operates fairly with the partner workers by providing the partner workers the following information in its partner workers Data Subject Information Statement under Article 13 or 14 of the UK GDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;
 - (c) information on the rights and freedoms granted to the Data Subject by the DPL; and

(d) all other information relevant to the Processing.

8.3.2.2 The template statement for partner workers is provided at Schedule 14.

8.3.3 Transparent

8.3.3.1 RNCSF has developed this policy and the partner workers Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to the partner workers.

8.3.3.2 Information on how Personal Data relating to the partner workers is processed is set out in the partner workers data subject information statement.

8.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for partner workers.

8.3.4 Processing Purposes and Ancillary Use

8.3.4.1 The partner worker's Personal Data are Processed for the following purposes:

- the management of the relationship between RNCSF and the Partner Organisation;
- the support of children receiving bursaries from the Charity;
- the support of families applying to the Charity for a bursary;
- keeping the partner worker informed about the activities of the Charity;
- regulatory and statutory compliance;
- fundraising;
- information about the donation and the activities of the Partner Organisation.

8.3.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all partner workers.

8.3.4.3 The partner worker Data Subject Information Statement is provided to the partner worker as a result of first contact or their appointment as a partner worker whichever arises first.

8.3.4.4 RNCSF may undertake Processing of Personal Data relating to partner workers which is not included in the Data Subject Information Statement for partner workers, however, this is only permitted where it is ancillary to one of the purposes specified.

- 8.3.4.5 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the partner workers Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.
 - 8.3.4.6 RNCSF may Process partner worker Personal Data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the GDPR, provided that such Processing is not be considered to be incompatible with the initial purposes. Generally maintaining a record of those supporting people through RNCSF will fall within the historical research purposes in accordance with Article 89.
- 8.3.5 Adequate, relevant and limited to what is necessary
- 8.3.5.1 RNCSF shall ensure that all partner worker Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that is to support the operation of RNCSF through the effective management of the bursary process.
 - 8.3.5.2 RNCSF shall collect Personal Data from the partner workers and any referring party, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the partner workers – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the partner worker.
 - 8.3.5.3 RNCSF shall only collect Personal Data which are relevant to the operation of the bursary programme.
 - 8.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to partner workers, such Personal Data shall be removed from the files and destroyed in a confidential manner.
- 8.3.6 Accurate and, where necessary, kept up to date
- 8.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 8.3.6.2 RNCSF shall ensure that Personal Data added to any partner worker database is correctly entered and audited following entry and any errors corrected.

- 8.3.6.3 The partner workers will be asked to keep information up to date. However, RNCSF will also take steps each to confirm that the Personal Data that is holds is accurate, usually by requesting a review on an annual basis.
- 8.3.6.4 Personal Data of partner workers will be retained for at least 7 years following their final contact with RNCSF or the final child they supported leaving the bursary programme, whichever is the later.
- 8.3.6.5 Where a partner worker has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 8.3.7 Storage
- 8.3.7.1 RNCSF shall keep all partner worker Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.
- 8.3.7.2 Partner worker's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
- 8.3.7.3 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.
- 8.3.7.4 Partner workers may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court. For example, whilst RNCSF may cease to Process Personal Data for marketing purposes on request, it will need to hold Personal Data in respect of partnership working for at least 7 years following the last child supported to leave the bursary programme and case of queries or claims.
- 8.3.8 Security
- 8.3.8.1 RNCSF shall ensure that all partner worker's Personal Data are 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.
- 8.3.8.2 RNCSF shall not keep paper files on partner workers.

- 8.3.8.3 All Personal Data that is stored within RNCSF's computer system is password protected.

8.3.8.4 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.

8.3.8.5 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.

8.3.8.6 No files shall be retained by RNCSF on partner workers on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

8.3.9 Overseas Issues

8.3.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to partner workers.

8.3.9.2 RNCSF works hard to ensure that this does not happen and draws the attention of the partner workers to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the partner workers being aware of the issues and consenting where necessary.

8.4 Electronic Marketing

8.4.1 Under the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003, it is a requirement that consent is obtained prior to sending electronic marketing information to individuals.

8.4.2 Therefore, whenever RNCSF collects email addresses it seeks to obtain the necessary consent to send electronic marketing emails. The consent text is as follows:

“By providing Royal National Children’s SpringBoard Foundation (**RNCSF**) with your email address you are consenting to RNCSF sending you information about RNCSF and its activities, including for the purposes of fundraising and marketing.”

9 Suppliers

9.1 General

9.1.1 RNCSF Processes Personal Data of individual suppliers and employees and volunteers of its suppliers.

9.2 Description of Data

9.2.1 The Personal Data Processed in relation to suppliers may include:

- Name;
- Contact details;
- Address;
- Complaints and enquiries.

9.3 Meeting the Requirements of Each Principle

9.3.1 Lawful

9.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the UK GDPR one of the Principles set out in Article 9 of the GDPR also applies.

9.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to supplier's Personal Data as a matter of law separate to the DPL.

9.3.1.3 The legal basis on which the Processing of suppliers' Personal Data is

- (a) the contract between them; or
- (b) when the contract is with the employer of the supplier and RNCSF holds Personal Data rather than simply data relating to a working relationship that such Processing is undertaken as a result of the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing which is undertaken by RNCSF fulfils its legitimate interest and the interests of the suppliers are not overridden by the interests and freedoms afforded to the suppliers – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.

9.3.1.4 No special categories of Data shall be processed by RNCSF in relation to suppliers.

- 9.3.2 Fairness
- 9.3.2.1 RNCSF ensures that it operates fairly with the suppliers by providing the suppliers the following information in its suppliers Data Subject Information Statement under Article 13 or 14 of the UK GDPR:
- (a) the name of RNCSF as Data Controller;
 - (b) the purposes/s for which the data are intended to be processed;
 - (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
 - (d) all other information relevant to the Processing.
- 9.3.2.2 The template statement for suppliers is provided at Schedule 9.
- 9.3.3 Transparent
- 9.3.3.1 RNCSF has developed this policy and the suppliers Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to the suppliers.
- 9.3.3.2 Information on how Personal Data relating to the suppliers is processed is set out in the supplier's data subject information statement.
- 9.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for suppliers.
- 9.3.4 Processing Purposes and Ancillary Use
- 9.3.4.1 The supplier's Personal Data are Processed for the following purposes:
- determining whether or not a person will become a supplier to the Charity;
 - performing the contract for the supply of goods or services between the supplier and the Charity;
 - administration in relation to the supply of goods or services that the supplier provides to the Charity;
 - statutory and regulatory compliance;
 - providing the supplier with information about the activities of the Charity and its partners; and

- processing any enquiries or complaints raised by or about the supplier and responding to any communications from the supplier.

9.3.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all suppliers.

9.3.4.3 The supplier Data Subject Information Statement is provided to the supplier as a result of first contact or their appointment as a supplier whichever arises first.

9.3.4.4 RNCSF may undertake Processing of Personal Data relating to suppliers which is not included in the Data Subject Information Statement for suppliers, however, this is only permitted where it is ancillary to one of the purposes specified.

9.3.4.5 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the suppliers Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.

9.3.5 Adequate, relevant and limited to what is necessary

9.3.5.1 RNCSF shall ensure that all supplier Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that the supply of goods and services to RNCSF.

9.3.5.2 RNCSF shall collect Personal Data from the suppliers and any referring party, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the suppliers – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the supplier.

9.3.5.3 RNCSF shall only collect Personal Data which are relevant to the supplier relationship.

9.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to suppliers, such Personal Data shall be removed from the files and destroyed in a confidential manner.

9.3.6 Accurate and, where necessary, kept up to date

9.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.

- 9.3.6.2 RNCSF shall ensure that Personal Data added to any supplier database is correctly entered and audited following entry and any errors corrected.
- 9.3.6.3 The suppliers will be asked to keep information up to date. However, RNCSF will also take steps each to confirm that the Personal Data that is holds is accurate, usually by requesting a review on a triannual basis.
- 9.3.6.4 Personal Data of suppliers will be retained for at least 7 years following their final contact with RNCSF so as to ensure full records in accordance with HMRC and general business rules.
- 9.3.6.5 Where a supplier has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 9.3.7 Storage
- 9.3.7.1 RNCSF shall keep all supplier Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.
- 9.3.7.2 Supplier's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
- 9.3.7.3 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.
- 9.3.7.4 Suppliers may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing this Personal Data without instruction from a court. For example, whilst RNCSF may cease to Process Personal Data for marketing purposes onrequest, it will need to hold Personal Data in respect the supply of services for 7 years as required for standard business records.
- 9.3.8 Security
- 9.3.8.1 RNCSF shall ensure that all supplier's Personal Data are 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.
- 9.3.8.2 RNCSF shall not keep paper files on suppliers.

- 9.3.8.3 All Personal Data that is stored within RNCSF's computer system is password protected.
- 9.3.8.4 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.
- 9.3.8.5 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.
- 9.3.8.6 No files shall be retained by RNCSF in relation to suppliers on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

9.3.9 Overseas Issues

- 9.3.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to suppliers.
- 9.3.9.2 RNCSF works hard to ensure that this does not happen and draws the attention of the suppliers to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the suppliers being aware of the issues and consenting where necessary.

9.4 Electronic Marketing

- 9.4.1 Under the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003, it is a requirement that consent is obtained prior to sending electronic marketing information to individuals.
- 9.4.2 Therefore, whenever RNCSF collects email addresses it seeks to obtain the necessary consent to send electronic marketing emails. The consent text is as follows:

“By providing Royal National Children's SpringBoard Foundation (**RNCSF**) with your email address you are consenting to RNCSF sending you information about RNCSF and its activities, including for the purposes of fundraising and marketing.”

10 Contacts

10.1 General

10.1.1 This category includes all those categories of individuals other than those specified above. This category includes those signing up through the RNCSF website to receive updates on products and other activities and those signing up on RNCSF's premises for information about RNCSF and its services and key individuals who are contacted by RNCSF directly without seeking to register.

10.1.2 In relation to general contract there is no contract between them and RNCSF, therefore, it will be necessary to obtain their consent to Process their Personal Data for the purposes of marketing RNCSF's products and services to such people.

10.2 Description of Data

10.2.1 All data that is gathered from Contacts of RNCSF can potentially be Personal Data. This information will include:

- any of the Contacts contact details for instance, street address, email address, landline and mobile telephone numbers;
- marketing records and reports;
- information that is gathered as part of surveys conducted by RNCSF;
- information gathered through registration for services provided to contacts; and
- information that is obtained lawfully from other partners;
- complaints and enquiries.

10.3 Meeting the Requirements of Each Principle

10.3.1 Lawful

10.3.1.1 The Processing of Personal Data is lawful provided that at least one of the Principles set out in Article 5 of the UK GDPR applies to the Processing of Personal Data and where the Personal Data is a special category of Personal Data that in addition to a Principle set out in Article 5 of the UK GDPR one of the Principles set out in Article 9 of the GDPR also applies.

10.3.1.2 RNCSF ensures that there is no restriction preventing the Processing it undertakes in relation to contact's Personal Data as a matter of law separate to the DPL.

10.3.1.3 The legal basis on which the Processing of contacts' Personal Data is:

- (a) consent; or

- (b) that such Processing is undertaken as a result of the legitimate interests of RNCSF (Article 6(1)(f)) in that the Processing which is undertaken by RNCSF fulfils its legitimate interest and the interests of the contacts are not overridden by the interests and freedoms afforded to the contacts – a legitimate interests assessment has been carried out to confirm the appropriateness of the use of this principle.
- 10.3.1.4 No special categories of Data shall be processed by RNCSF in relation to contacts.
- 10.3.2 Fairness
- 10.3.2.1 RNCSF ensures that it operates fairly with the contacts by providing the contacts the following information in its contacts Data Subject Information Statement under Article 13 or 14 of the UK GDPR:
- (a) the name of RNCSF as Data Controller;
- (b) the purposes/s for which the data are intended to be processed;
- (c) information on the rights and freedoms granted to the Data Subject by the DPL; and
- (d) all other information relevant to the Processing.
- 10.3.2.2 The template statement for contacts is provided at Schedule 6.
- 10.3.3 Transparent
- 10.3.3.1 RNCSF has developed this policy and the contacts Data Subject Information Statement in such a way as to ensure that all Processing and the application of this Policy is transparent to the contacts.
- 10.3.3.2 Information on how Personal Data relating to the contacts is processed is set out in the contact's data subject information statement.
- 10.3.3.3 The CEO will consider not less than every 24 months that this policy remains transparent for contacts.
- 10.3.4 Processing Purposes and Ancillary Use
- 10.3.4.1 The contact's Personal Data are Processed for the following purposes:
- marketing to you its goods and services;
 - marketing to you the goods and services of any companies within the same group as the Charity or any third parties;

- administration and archiving;
- keeping you informed about the Charity's activities along with our sub-culture music activities and the sporting activities and people that we sponsor;
- Processing information relating to our competitions and other promotional activity;
- Processing any enquiries or complaints raised by you and responding to any communications from you;
- transferring to third parties with whom we have a business relationship;
- providing information to credit reference agencies;
- (if you explicitly consent) sending electronic marketing communications to you keeping you informed about the activities falling into any of the above categories.

10.3.4.2 The purposes are set out in the Data Subject Information Statement which is issued to all contacts.

10.3.4.3 The contact Data Subject Information Statement is provided to the contact when RNCSF first processes the contacts Personal Data.

10.3.4.4 RNCSF may undertake Processing of Personal Data relating to contacts which is not included in the Data Subject Information Statement for contacts, however, this is only permitted where it is ancillary to one of the purposes specified.

10.3.4.5 If RNCSF wishes through necessity to Process Personal Data for a purposes not specified in the contacts Data Subject Information Statement, this is only permissible where the purposes are not incompatible with the specified purposes, if any additional Processing is required a new Data Subject Information Statement setting out the Processing, the basis behind it and the reasons why such Processing is needed and permitted.

10.3.5 Adequate, relevant and limited to what is necessary

10.3.5.1 RNCSF shall ensure that all contact Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, that the supply of goods and services to RNCSF.

- 10.3.5.2 RNCSF shall collect Personal Data from the contacts and any referring party, to ensure that it has adequate Personal Data to allow it to make all relevant decisions in relation to the contacts – should RNCSF identify that it does not have adequate Personal Data to undertake all Processing, it shall request the missing Personal Data from the contact.
 - 10.3.5.3 RNCSF shall only collect Personal Data which are relevant to the contact relationship.
 - 10.3.5.4 Where RNCSF identifies that it is no longer necessary to continue to hold Personal Data relating to contacts, such Personal Data shall be removed from the files and destroyed in a confidential manner.
- 10.3.6 Accurate and, where necessary, kept up to date
- 10.3.6.1 RNCSF shall take every reasonable step to ensure that any inaccurate Personal Data, having regard to the purposes for which they are Processed, are erased or rectified without delay.
 - 10.3.6.2 RNCSF shall ensure that Personal Data added to any contact database is correctly entered and audited following entry and any errors corrected.
 - 10.3.6.3 The contacts will be asked to keep information up to date. However, RNCSF will also take steps each to confirm that the Personal Data that is holds is accurate, usually by requesting a review on a triannual basis.
 - 10.3.6.4 Personal Data of contacts will be retained for at least 7 years following their final contact with RNCSF so as to ensure full records in accordance with HMRC and general business rules.
 - 10.3.6.5 Where a contact has concerns about the accuracy of their Personal Data RNCSF will take such reasonable action as is necessary to ensure the accuracy of the information.
- 10.3.7 Storage
- 10.3.7.1 RNCSF shall keep all contact Personal Data kept in a form which permits identification of Data Subjects and ensure that Personal Data is stored in a manner which allows specific Personal Data to be removed should it no longer be necessary to RNCSF to Process the Personal Data.
 - 10.3.7.2 Contact's Personal Data will be kept in accordance with the type of data outlined in the Retention of Records – Schedule 17.
 - 10.3.7.3 Where the period of time outlined in the Retention of Records has expired, RNCSF will within 12 months of the recommended retention time remove and destroy the Personal Data.

10.3.7.4 Contacts may in some circumstances request that RNCSF no longer continue to Process their Personal Data. RNCSF will consider such request on a case by case basis and may not stop Processing. For example, whilst RNCSF may cease to Process Personal Data for marketing purposes on request, it will need to hold Personal Data in respect the supply of services for 7 years as required for standard business records.

10.3.8 Security

10.3.8.1 RNCSF shall ensure that all contact's Personal Data are 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.

10.3.8.2 RNCSF shall not keep paper files on contacts.

10.3.8.3 All Personal Data that is stored within RNCSF's computer system is password protected.

10.3.8.4 Any laptops and data sticks that may be used to access Personal Data at RNCSF will be password protected and the Personal Data will be encrypted.

10.3.8.5 RNCSF shall ensure that the servers on which Personal Data are stored remain secure.

10.3.8.6 No files shall be retained by RNCSF in relation to contacts on home computers or in hard copy at home or otherwise outside of RNCSF's premises.

10.3.9 Overseas Issues

10.3.9.1 Due to the nature of the Internet it is possible that some Personal Data controlled by RNCSF may be transferred outside of the EEA and this issue is highlighted to contacts.

10.3.9.2 RNCSF works hard to ensure that this does not happen and draws the attention of the contacts to circumstances where this can happen. RNCSF shall take all reasonable steps to ensure that Personal Data are not transferred outside of the EEA without the contacts being aware of the issues and consenting where necessary.

10.4 Electronic Marketing

10.4.1 Under the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003, it is a requirement that consent is obtained prior to sending electronic marketing information to individuals.

10.4.2 Therefore, whenever RNCSF collects email addresses it seeks to obtain the necessary consent to send electronic marketing emails. The consent text is as follows:

“By providing Royal National Children’s SpringBoard Foundation (**RNCSF**) with your email address you are consenting to RNCSF sending you information about RNCSF and its activities, including for the purposes of fundraising and marketing.”

10.4.3 RNCSF will ensure that all marketing to potential contacts is undertaken in the same manner as for contacts. In summary:

10.4.3.1 whenever Personal Data are collected a subject information statement will be provided;

10.4.3.2 RNCSF will see to obtain the consent of all individuals that receive marketing from RNCSF; and

10.4.3.3 RNCSF will ensure that any electronic marketing is undertaken in accordance with the requirements of the Privacy and Electronic (EC Directive) Regulations 2003.

SECTION 6 – CONCLUSION

- 1 RNCSF is committed to:
 - (a) protecting Personal Data;
 - (b) Processing Personal Data in accordance with the DPL;
 - (c) ensuring that it is transparent in its dealings with Personal Data.

- 2 Employees and Contractors that breach this Policy or fail to adhere to this Policy when Processing Personal Data may be committing a disciplinary offence which may lead to dismissal from employment after consideration by RNCSF of the seriousness of the breach of policy. In addition to disciplinary matters any disclosure of Personal Data otherwise than in accordance with this Policy or the DPL may also expose the Employee or Contractor to personal criminal liability under the DPL.

- 3 The CEO has overall responsibility for this Policy. Should any Employee or Contractor have any questions regarding this Policy please direct them to your line manager in the first instance.

- 4 RNCSF shall review this Policy every three years, the CEO shall be responsible for any changes after approval by the Trustees.

SCHEDULE 1 – EMPLOYEES (1)

DATA SUBJECT INFORMATION STATEMENT – EMPLOYEES

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) Processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. You are employed by the Charity.
- 1.2. The Charity is Processing your Personal Data in relation to your employment.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. the administration of your employment with the Charity;
 - 2.1.2. where we are required to do so, confirming your suitability and your continued suitability for the work that you carry out, including any checks and updates that are required by the Charity or any other body to be made:
 - 2.1.2.1. with the Disclosure and Barring Service which may result in the Charity retaining information about criminal convictions;
 - 2.1.2.2. in connection with your health including screening and making decisions based on any health records which may be collected by, or transferred to, the Charity;
 - 2.1.3. any statutory requirements relating to you, or any application or submission made by you in relation to your employment;
 - 2.1.4. managing and administering any employment processes relating to you; and
 - 2.1.5. retention of your Personal Data following the end of your employment to ensure that sufficient information is maintained for the purposes of confirming your employment, maintaining our records and areas of responsibility and the provision of references.
- 2.2. The legal basis on which the above Processing takes place is:
 - 2.2.1. the contract between us;
 - 2.2.2. the employment condition set out in Article 9(2)(b) of the UK GDPR which permits the Processing of Special Categories of Personal Data for the purpose of employment to comply with our employment law and associated obligations;

- 2.2.3. the protection of your vital interests, specifically in relation to health and safety and the protection of your health in accordance with Articles 6(1)(d) and 9(2)(c).
- 2.3. As we process your personal data for the purposes of the contract between us and for under the specific employment condition, we do not need to obtain your consent for the Processing we undertake of your Personal Data.

3. Source

- 3.1. Whilst you have provided some of the Personal Data, which is Processed by the Charity, we have also obtained Personal Data, from your referees, former employers, employment agencies, HM Revenue and Customs (**HMRC**).

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. HMRC;
 - 4.1.2. our sub-contractors providing services to us, for example payroll, pension providers, providers of employee benefits;
 - 4.1.3. central and local government and their agencies;
 - 4.1.4. the Disclosure and Barring Service if we are required to undertake checks in relation to your suitability to undertake a designated role.
- 4.2. Please be aware that certain information about your role will be publicly available and will also be made available to third parties with which the Charity works, for example, donors, beneficiaries and third parties supporting the work of the Charity. Please note that this will not include confidential information relating to your employment, but will include contact information and information about your role.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) including Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws, where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.

5.2.4. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or

5.2.5. we have obtained your explicit consent.

6. Storage

6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends. This is because we generally need to keep information that may be relevant to the services we provide for up to seven years.

7. Your Rights

7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and for the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.

7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is completed to have the information completed. To obtain rectification or completion you will need to provide the correct information to the Charity, an explanation of why you believe the information is inaccurate or incorrect would also be of assistance.

7.3. Where certain grounds, as set out in Article 17(1) of the GDPR, apply you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.

7.4. Where certain grounds, as set out in Article 12(1) of the GDPR, apply you will be entitled to have the Charity restrict the Process of certain Personal Data relating to you. Where you wish to exercise your right to restrict processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.

7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is "consent" you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability please contact admin@royalspringboard.org.uk.

8. Complaints

8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.

8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner's Office.

- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to personal data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:

- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- 9.1.4. **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- 9.1.5. **Special Categories of Personal Data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Data Protection Team can be contacted:

- 10.1.1. in writing at RNCSF,7 Grosvenor Gardens, London, SW1W 0BD;
- 10.1.2. by email at admin@royalspringboard.org.uk; or
- 10.1.3. by telephone by calling 01932 868622.

11. Further Information

- 11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this statement. However, if this position does change the Charity will provide you with further information.
- 11.2. This statement was last updated on 7th June 2021.

SCHEDULE 2 – EMPLOYEES (2)**Data Capture Statements for RNCSF Employee Medical Declarations Form**

“RNCSF having undertaken to Process the Personal Data (as defined by the UK General Data Protection Regulation (the UK **GDPR**)) provided to it in accordance with the requirements of the UK GDPR, I hereby give my explicit consent for the Special Categories of Personal Data I have disclosed in this form to be processed by Royal National Children’s SpringBoard Foundation (**RNCSF**) for the purposes of:

- 1 my employment with RNCSF; and
- 2 any statutory requirements relating to me or my employment; and
- 3 transferring to other organisations that provide RNCSF with employee benefit support and services.

By signing below, I give explicit consent to RNCSF to process the Special Categories of Personal Data I have disclosed or which RNCSF acquire from any agency or third party to which we have applied for information.

Signature

Date

Print Full Name”

SCHEDULE 3 – CONTRACTORS (1)

DATA SUBJECT INFORMATION STATEMENT – CONTRACTORS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity during the course of their working relationship with the Charity. As a contractor, you may provide services to the Charity as, for example, a sole trader, or as an individual through a personal services company, other limited company or partnership.
- 1.3. This statement applies to all prospective, current and former contractors.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. determining whether or not you will become a contractor of the Charity;
 - 2.1.2. performing the contract for services between you and the Charity;
 - 2.1.3. administration in relation to the services that you provide for the Charity;
 - 2.1.4. statutory and regulatory compliance;
 - 2.1.5. providing you with information about the activities of the Charity and its partners; and
 - 2.1.6. processing any enquiries or complaints raised by or about you and responding to any communications from you.
- 2.2. The legal basis on which the above Processing takes place is:
 - 2.2.1. it is necessary for the performance of the contract between us and you; or
 - 2.2.2. the legitimate interests shared by RNCSF and you as set out below.
- 2.3. The legitimate interests which permit the above Processing to take place are:

- 2.3.1. that the Processing is reasonable in relation to the activities to which it relates;
- 2.3.2. the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of the performance of your contract with the Charity;
- 2.3.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
- 2.3.4. that if you or we sought to terminate your contract with the Charity, we would still be required to retain information relating to the contract for services between us for at least seven years.

3. Source

- 3.1. The Personal Data which is Processed by the Charity is provided:
 - 3.1.1. directly by you; and
 - 3.1.2. by third parties in the course of your becoming a contractor (for example, references, credit checks).

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. HMRC;
 - 4.1.2. our sub-contractors providing services to us; and
 - 4.1.3. central and local government and their agencies.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) and countries where the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.

- 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or

5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is "consent", you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner's Office.
- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

9.1. The following terms have the following meaning in this Statement:

9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

10.1. The Charity can be contacted:

10.1.1. in writing at RNCSE, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

11.2. This Statement was last updated on 7th June 2021.

SCHEDULE 4 – CONTRACTORS (2)**Data Capture Statements for RNCSF Contractors Medical Declarations Form**

“RNCSF having undertaken to Process the Personal Data (as defined by the UK General Data Protection Regulation (the UK **GDPR**)) provided to it in accordance with the requirements of the UK GDPR, I hereby give my explicit consent for the Special Categories of I have disclosed in this form to be processed by Royal National Children’s SpringBoard Foundation (**RNCSF**) for the purposes of:

- 1 my contract with RNCSF; and
- 2 any statutory requirements relating to me or my contract with RNCSF;
- 3 transferring to other organisations that provide RNCSF with insurance in relation to my not being in a position to fulfil my contract as a result of the medical information I have disclosed.

By signing below, I give explicit consent to RNCSF to process the Special Categories of Personal Data I have disclosed or which RNCSF acquire from any agency or third party to which we have applied for information.

Signature

Date

Print Full Name”

SCHEDULE 5 – SUPPORTED YOUNG PEOPLE

DATA SUBJECT INFORMATION STATEMENT – SUPPORTED YOUNG PEOPLE

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) Processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and Processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity so that they can be kept informed about the Charity’s activities.
- 1.3. You are provided with this statement as you are a young person being supported by the Charity.
- 1.4. As you are aged under the age of 18, this information will also be provided to your parent and/or guardian. Where a word is capitalised, this means that it is a “defined term” and you will find the definition in Paragraph 9 below.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. providing you with a bursary and assistance with your schooling, pastoral care and associated activities;
 - 2.1.2. providing the school which you are attending with information about you and the support being provided in order to maintain your place at the school;
 - 2.1.3. where applicable, providing the partner charity or organisation which also supports you with information about you;
 - 2.1.4. providing you with information about the activities of the Charity and its partners;
 - 2.1.5. administration in relation to the support provided by the Charity;
 - 2.1.6. statutory and regulatory compliance;
 - 2.1.7. managing any enquiries or complaints raised by you and responding to any communications from you;
 - 2.1.8. providing an alumni group which you can access; and

- 2.1.9. (if permitted as set out in Paragraph 2.3 below) sending electronic marketing communications to you keeping you informed about the Data Protection Act 2018 activities falling into any of the above categories.
- 2.2. The legal basis that we use to Process your Personal Data is the agreement between us, and legitimate interests shared by the Charity and you as set out below.
- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information the rules are different, and we are permitted to contact you electronically, because:
 - 2.3.1. of the relationship between us;
 - 2.3.2. you have been provided support from the Charity which is similar to that about which we are contacting you;
 - 2.3.3. you have provided consent to receive electronic information;
 - 2.3.4. consent is not required, and legitimate interests apply permitting the Processing set out in the Statement; or
 - 2.3.5. you have signed up for update information from the Charity.
- 2.4. Where the legal basis of the Processing the Charity undertakes in respect of your electronic marketing is obtaining your consent, you may withdraw consent at any time. Should you withdraw your consent, the Charity shall cease to Process your Personal Data for marketing purposes. You may revoke your consent to receive such updates by changing your preferences by contacting the Charity using the contact details provided in this Statement or by using the unsubscribe function included in each update. Please note that this will not stop the Charity from Processing your Personal Data for other purposes where such Processing is permitted.
- 2.5. There is an agreement between you and the Charity under which the Charity is providing you with funding for your education and related activities and costs. In order for this agreement to operate, it is necessary that the Charity Processes your Personal Data for the purposes set out in this statement.
- 2.6. The legitimate interests which permit the above Processing to take place are:
 - 2.6.1. that the Processing is reasonable in relation to the activities to which it relates;
 - 2.6.2. that the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of the provision of support and related activities;
 - 2.6.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.6.4. that if you sought to terminate your consent to the Charity Processing your Personal Data, we may still be required to retain information about you for legal reasons.

3. Source

- 3.1. You have provided the Personal Data which is Processed by the Charity. Other Personal Data is provided by the school which you are attending, your parents and/or guardians, where applicable, such partner charity or organisation which also supports you and other referees.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
- 4.1.1. the school which you are attending;
 - 4.1.2. any other charity or organisation which is also providing support and/or funding in respect of your education, pastoral care or related activities;
 - 4.1.3. central and local government and their agencies;
 - 4.1.4. the police and related agencies;
 - 4.1.5. HM Revenue and Customs;
 - 4.1.6. third party suppliers to the Charity.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) including Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
- 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends. Please note that

following the end of the Charity's support of your education, our relationship will continue through you being a member of our alumni until this relationship is terminated by you or the Charity.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the UK GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:

- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:
- 10.1.1. in writing at RNCSEF, 7 Grosvenor Gardens, London, SW1W 0BD;
- 10.1.2. by email at admin@royalspringboard.org.uk; or
- 10.1.3. by telephone by calling 01932 868622.

11. Further Information

- 11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.
- 11.2. This Statement was last updated on 7th June 2021.

SCHEDULE 6 – GENERAL CONTACTS

General Contacts

Short Form

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) Processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information provided on the subject information statement provided at www.royalspringboard.org.uk/policies.

Long Form

DATA SUBJECT INFORMATION STATEMENT – GENERAL CONTACTS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity as a general contact.
- 1.3. This statement applies to all general contacts were a specific subject information statement does not apply.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. marketing to you its goods and services;
 - 2.1.2. marketing to you the goods and services of any companies within the same group as the Charity or any third parties;
 - 2.1.3. administration and archiving;
 - 2.1.4. keeping you informed about the Charity’s activities along with our sub-culture music activities and the sporting activities and people that we sponsor;

- 2.1.5. Processing information relating to our competitions and other promotional activity;
 - 2.1.6. Processing any enquiries or complaints raised by you and responding to any communications from you;
 - 2.1.7. transferring to third parties with whom we have a business relationship;
 - 2.1.8. providing information to credit reference agencies;
 - 2.1.9. (if you explicitly consent) sending electronic marketing communications to you keeping you informed about the activities falling into any of the above categories.
- 2.2. The legal basis on which the above Processing takes place is:
- 2.2.1. it is necessary for the performance of the contract between us and you; or
 - 2.2.2. the legitimate interests shared by RNCSF and you as set out below.
- 2.3. The legitimate interests which permit the above Processing to take place are:
- 2.3.1. that the Processing is reasonable in relation to the activities to which it relates;
 - 2.3.2. the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of your links to the Charity;
 - 2.3.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.3.4. that if you sought or we to terminate your contract with the Charity, we would still be required to retain information relating to the contract between us for at least seven years.

3. Source

- 3.1. The Personal Data which is Processed by the Charity is provided:
- 3.1.1. directly by you; and
 - 3.1.2. by third parties in the course of your becoming a supplier to the Charity (for example, references, credit checks).

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
- 4.1.1. our sub-contractors providing services to us; and
 - 4.1.2. central and local government and their agencies.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) including Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.

- 7.4. Where certain grounds, as set out in Article 12(1) of the GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:
- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:

10.1.1. in writing at RNCSF, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

This Statement was last updated on 7th June 2021.

SCHEDULE 7 – TRUSTEES

Subject Information Statement for Trustees

DATA SUBJECT INFORMATION STATEMENT – TRUSTEES

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity prior to, during and following the course of their engagement with the Charity as Trustees and as members of the Charity’s Advisory Board.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. engaging with you as a prospective, current and former volunteer for RNCSF, which includes maintaining effective governance of RNCSF and complying with RNCSF’s safer recruitment policy;
 - 2.1.2. administration in relation to the volunteering role that you undertake for RNCSF;
 - 2.1.3. in respect of Trustees and members of the Advisory Board, publishing information about you on RNCSF’s website and in relevant documentation produced by RNCSF;
 - 2.1.4. providing you with information about the activities of RNCSF and its partners;
 - 2.1.5. statutory and regulatory compliance;
 - 2.1.6. processing any enquiries or complaints raised by or about you and responding to any communications from you;
 - 2.1.7. transferring to third parties with whom we have a relationship; and

- 2.1.8. (if you explicitly consent) sending electronic marketing communications to you keeping you informed about data protection activities falling into any of the above categories.
- 2.2. The legal basis on which the above Processing takes place is:
 - 2.2.1. the legitimate interests shared by RNCSF and you as set out below; or
 - 2.2.2. where it is necessary for compliance with a legal obligation to which RNCSF is subject.
- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information we are required to obtain your consent. Where you have already provided that consent, no further action is taken. If you have not provided such consent, please register to receive information by contacting us at admin@royalspringboard.org.uk and confirming that you wish to receive electronic updates.
- 2.4. Where the legal basis of the Processing RNCSF undertakes is obtaining your consent, please note that you may withdraw consent at any time. Should you withdraw your consent, RNCSF shall cease to Process your Personal Data. You may revoke your consent to receive such updates by changing your preferences by contacting the Charity using the contact details provided in this Statement or by using the unsubscribe function included in each update.
- 2.5. The legitimate interests which permit the above Processing to take place are:
 - 2.5.1. the need to comply with regulatory requirements in relation to your role as a volunteer, for example, the need to provide some of your Personal Data to the Charity Commission and Companies House;
 - 2.5.2. that the Processing is reasonable in relation to the activities to which it relates;
 - 2.5.3. the Processing is such as you would reasonably expect to be undertaken by RNCSF in respect of your role as a volunteer;
 - 2.5.4. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of RNCSF and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.5.5. that if you sought to terminate your consent to RNCSF Processing your Personal Data, we would still be required to retain information on your role as a volunteer for at least six years.

3. Source

- 3.1. You have provided the Personal Data which is Processed by the Charity.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. HMRC;
 - 4.1.2. organisations from which we seek to attract funding;
 - 4.1.3. our sub-contractors providing services to us; and
 - 4.1.4. central and local government and their agencies.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.

- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:
 - 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
 - 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:

10.1.1. in writing at RNCSF, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

- 11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

This Statement was last updated on 7th June 2021.

SCHEDULE 8 – APPLICANTS

DATA SUBJECT INFORMATION STATEMENT – APPLICANTS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) Processes your Personal Data in accordance with the UK General Data Protection Regulation (the UK **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and Processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity so that they can be kept informed about the Charity’s activities.
- 1.3. You are provided with this statement as you are applying to receive support from us either as a young person or a parent and/or guardian of a young person. At the point of application, we treat the data of both the young people and their parent and/or guardian in the same way.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. reviewing your application to evaluate whether you meet the criteria for support;
 - 2.1.2. managing the application process;
 - 2.1.3. working with schools and other organisations providing support to see if it is possible to provide you with support;
 - 2.1.4. providing schools with information to evaluate whether you will be able to attend the school if funding is provided;
 - 2.1.5. providing you with information about the activities of the Charity and its partners;
 - 2.1.6. statutory and regulatory compliance;
 - 2.1.7. managing any enquiries or complaints raised by you and responding to any communications from you; and
 - 2.1.8. (if permitted as set out in Paragraph 2.3 above) sending electronic marketing communications to you keeping you informed about the activities falling into any of the above categories.

- 2.2. The legal basis that we use to Process your Personal Data is the legitimate interests shared by you and the Charity to assess your application.
- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information the rules are different and we are permitted to contact you electronically, because:
 - 2.3.1. of the relationship between us;
 - 2.3.2. you have provided consent to receive electronic information;
 - 2.3.3. consent is not required and legitimate interests apply permitting the Processing set out in the Statement; or
 - 2.3.4. you have signed up for update information from the Charity.
- 2.4. Where the legal basis of the Processing the Charity undertakes in respect of your electronic marketing is obtaining your consent, you may withdraw consent at any time. Should you withdraw your consent, the Charity shall cease to Process your Personal Data for marketing purposes. You may revoke your consent to receive such updates by changing your preferences by contacting the Charity using the contact details provided in this Statement or by using the unsubscribe function included in each update. Please note that this will not stop the Charity from Processing your Personal Data for other purposes where such Processing is permitted.
- 2.5. The legitimate interests which permit the above Processing to take place are:
 - 2.5.1. that the Processing is reasonable in relation to the activities to which it relates, that is to assess your application and to keep you informed about the activities of the Charity;
 - 2.5.2. that the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of the provision of assessing your application and related activities;
 - 2.5.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.5.4. that if you sought to terminate your consent to the Charity Processing your Personal Data, we may still be required to retain information on your application for legal reasons.

3. Source

- 3.1. You have provided the Personal Data which is Processed by the Charity. Other Personal Data is provided by schools, referees and other individuals and organisations supporting your application.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. the schools that you may attend;
 - 4.1.2. any other charity or organisation which may also provide support and/or funding in respect of your application;
 - 4.1.3. central and local government and their agencies;
 - 4.1.4. the police and related agencies;
 - 4.1.5. HM Revenue and Customs;
 - 4.1.6. medical agencies;
 - 4.1.7. third party suppliers to the Charity.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) and Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of the application process. We will also hold the information for seven years following your application if unsuccessful. We will keep a record of your name and other key identification data as an unsuccessful applicant, whilst deleting other information, at the end of seven years. If you are successful, your Personal Data will be held in a different way and we will notify you of this through an additional statement.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the UK GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:

- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:
- 10.1.1. in writing at RNCSE, 7 Grosvenor Gardens, London, SW1W 0BD;
- 10.1.2. by email at admin@royalspringboard.org.uk; or
- 10.1.3. by telephone by calling 01932 868622.

11. Further Information

- 11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.
- 11.2. This Statement was last updated on 7th June 2021.

SCHEDULE 9 – SUPPLIERS

DATA SUBJECT INFORMATION STATEMENT – SUPPLIERS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the UK General Data Protection Regulation (the UK **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity during the course of their supplying goods or services to the Charity.
- 1.3. This statement applies to all prospective, current and former suppliers.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. determining whether or not you will become a supplier to the Charity;
 - 2.1.2. performing the contract for the supply of goods or services between you and the Charity;
 - 2.1.3. administration in relation to the supply of goods or services that you provide to the Charity;
 - 2.1.4. statutory and regulatory compliance;
 - 2.1.5. providing you with information about the activities of the Charity and its partners; and
 - 2.1.6. processing any enquiries or complaints raised by or about you and responding to any communications from you.
- 2.2. The legal basis on which the above Processing takes place is:
 - 2.2.1. it is necessary for the performance of the contract between us and you; or
 - 2.2.2. the legitimate interests shared by RNCSF and you as set out below.
- 2.3. The legitimate interests which permit the above Processing to take place are:
 - 2.3.1. that the Processing is reasonable in relation to the activities to which it relates;

- 2.3.2. the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of the performance of your contract to supply goods or services to the Charity;
- 2.3.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
- 2.3.4. that if you sought or we to terminate your contract with the Charity, we would still be required to retain information relating to the contract between us for at least seven years.

3. Source

- 3.1. The Personal Data which is Processed by the Charity is provided:
 - 3.1.1. directly by you; and
 - 3.1.2. by third parties in the course of your becoming a supplier to the Charity (for example, references, credit checks).

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. our sub-contractors providing services to us; and
 - 4.1.2. central and local government and their agencies.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or

5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

9.1. The following terms have the following meaning in this Statement:

9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

10.1. The Charity can be contacted:

10.1.1. in writing at RNCSE, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

11.2. This Statement was last updated on 31 May 2019.

SCHEDULE 10 – SUPPORTED PARENTS / GUARDIANS

DATA SUBJECT INFORMATION STATEMENT – SUPPORTED PARENTS AND/OR GUARDIANS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) Processes your Personal Data in accordance with the UK General Data Protection Regulation (the UK **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and Processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity so that they can be kept informed about the Charity’s activities.
- 1.3. You are provided with this statement as you are the parent and/or guardian of a young person being supported by the Charity.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. providing you with a bursary and assistance with your child’s schooling, pastoral care and associated activities;
 - 2.1.2. providing the school which you child is attending with information about you and the support being provided in order to maintain your child’s place at the school;
 - 2.1.3. providing you with information about the activities of the Charity and its partners;
 - 2.1.4. administration in relation to the support provided by the Charity;
 - 2.1.5. statutory and regulatory compliance;
 - 2.1.6. managing any enquiries or complaints raised by you and responding to any communications from you;
 - 2.1.7. providing an alumni group which you can access; and
 - 2.1.8. (if permitted as set out in Paragraph 2.3 above) sending electronic marketing communications to you keeping you informed about the Data Protection Act 2018 activities falling into any of the above categories.
- 2.2. The legal basis that we use to Process your Personal Data is the agreement between us, and legitimate interests shared by the Charity and you as set out below.

- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information the rules are different, and we are permitted to contact you electronically, because:
- 2.3.1. of the relationship between us;
 - 2.3.2. you have been provided support from the Charity which is similar to that about which we are contacting you;
 - 2.3.3. you have provided consent to receive electronic information;
 - 2.3.4. consent is not required and legitimate interests apply permitting the Processing set out in the Statement; or
 - 2.3.5. you have signed up for update information from the Charity.
- 2.4. Where the legal basis of the Processing the Charity undertakes in respect of your electronic marketing is obtaining your consent, you may withdraw consent at any time. Should you withdraw your consent, the Charity shall cease to Process your Personal Data for marketing purposes. You may revoke your consent to receive such updates by changing your preferences by contacting the Charity using the contact details provided in this Statement or by using the unsubscribe function included in each update. Please note that this will not stop the Charity from Processing your Personal Data for other purposes where such Processing is permitted.
- 2.5. There is an agreement between you and the Charity under which the Charity is providing you with, or has arranged for the provision of, funding for your child's education and related activities and costs. In order for this agreement to operate, it is necessary that the Charity Processes your Personal Data for the purposes set out in this statement.
- 2.6. The legitimate interests which permit the above Processing to take place are:
- 2.6.1. that the Processing is reasonable in relation to the activities to which it relates;
 - 2.6.2. the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of the provision of support and related activities;
 - 2.6.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.6.4. that if you sought to terminate your consent to the Charity Processing your Personal Data, we may still be required to retain information about you for legal reasons.

3. Source

- 3.1. You have provided the Personal Data which is Processed by the Charity. Other Personal Data may be provided by supporting partner charities or other organisations, the school your child is attending and other referees.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. the school which your child is attending;
 - 4.1.2. any other charity or organisation which is also providing support and/or funding in respect of your child's education, pastoral care or related activities;
 - 4.1.3. central and local government and their agencies;
 - 4.1.4. the police and related agencies;
 - 4.1.5. HM Revenue and Customs;
 - 4.1.6. third party suppliers to the Charity.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends. Please note that following the end of the Charity's support of your child's education the Charity will continue to keep you informed of its activities unless you notify the Charity that you wish contact to end.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:

- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:
- 10.1.1. in writing at RNCSE, 7 Grosvenor Gardens, London, SW1W 0BD;
- 10.1.2. by email at admin@royalspringboard.org.uk; or
- 10.1.3. by telephone by calling 01932 868622.

11. Further Information

- 11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.
- 11.2. This Statement was last updated on 7th June 2021.

SCHEDULE 11 – VIRTUAL SCHOOL APPLICANTS

DATA SUBJECT INFORMATION STATEMENT – VIRTUAL SCHOOL APPLICANTS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) Processes your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and Processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity so that they can be kept informed about the Charity’s activities.
- 1.3. You are provided with this statement as you are applying to receive support from us either as a young person or a Head of the Virtual School, a social worker or foster carer who supports a young person. At the point of application we treat the data of both the young person and the Head of the Virtual School, social worker or foster carer in the same way.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. reviewing your application to evaluate whether you meet the criteria for support;
 - 2.1.2. managing the application process;
 - 2.1.3. working with schools and other organisations providing support to see if it is possible to provide you with support;
 - 2.1.4. providing schools with information to evaluate whether you will be able to attend the school if funding is provided;
 - 2.1.5. providing you with information about the activities of the Charity and its partners;
 - 2.1.6. statutory and regulatory compliance;
 - 2.1.7. managing any enquiries or complaints raised by you and responding to any communications from you; and
 - 2.1.8. (if permitted as set out in Paragraph 2.3 above) sending electronic marketing communications to you keeping you informed about the Data Protection Act 2018 activities falling into any of the above categories.

- 2.2. The legal basis that we use to Process your Personal Data is the legitimate interests shared by you and the Charity to assess your application.
- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information the rules are different and we are permitted to contact you electronically, because:
 - 2.3.1. of the relationship between us;
 - 2.3.2. you have provided consent to receive electronic information;
 - 2.3.3. consent is not required and legitimate interests apply permitting the Processing set out in the Statement; or
 - 2.3.4. you have signed up for update information from the Charity.
- 2.4. Where the legal basis of the Processing the Charity undertakes in respect of your electronic marketing is obtaining your consent, you may withdraw consent at any time. Should you withdraw your consent, the Charity shall cease to Process your Personal Data for marketing purposes. You may revoke your consent to receive such updates by changing your preferences by contacting the Charity using the contact details provided in this Statement or by using the unsubscribe function included in each update. Please note that this will not stop the Charity from Processing your Personal Data for other purposes where such Processing is permitted.
- 2.5. The legitimate interests which permit the above Processing to take place are:
 - 2.5.1. that the Processing is reasonable in relation to the activities to which it relates, that is to assess your application and to keep you informed about the activities of the Charity;
 - 2.5.2. that the Processing is such as you would reasonably expect to be undertaken by the Charity in respect of the provision of assessing your application and related activities;
 - 2.5.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.5.4. that if you sought to terminate your consent to the Charity Processing your Personal Data, we may still be required to retain information on your application for legal reasons.

3. Source

- 3.1. You have provided the Personal Data which is Processed by the Charity. Other Personal Data is provided by schools, referees and other individuals and organisations supporting your application.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. the schools that you may attend;
 - 4.1.2. any other charity or organisation which may also provide support and/or funding in respect of your application;
 - 4.1.3. central and local government and their agencies;
 - 4.1.4. the police and related agencies;
 - 4.1.5. HM Revenue and Customs;
 - 4.1.6. medical agencies;
 - 4.1.7. third party suppliers to the Charity.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of the application process. We will also hold the information for seven years following your application if unsuccessful. We will keep a record of your name and other key identification data as an unsuccessful applicant, whilst deleting other information, at the end of seven years. If you are successful, your Personal Data will be held in a different way and we will notify you of this through an additional statement.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the UK GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:

- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

10.1. The Charity can be contacted:

10.1.1. in writing at RNCSEF, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

This Statement was last updated on 7th June 2021.

SCHEDULE 12 – SUPPORTERS AND DONORS

Supporter and Donor Subject Access Statement

DATA SUBJECT INFORMATION STATEMENT – DONORS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the UK General Data Protection Regulation (the UK **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity during the course of their making donations to or otherwise supporting the Charity.
- 1.3. This statement applies to all prospective, current and former donors and supporters.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. acknowledging and processing any financial or other donations provided by you;
 - 2.1.2. future fundraising;
 - 2.1.3. providing you with information about the activities of the Charity and its partners;
 - 2.1.4. administration in relation to the support that you provide to the Charity;
 - 2.1.5. statutory and regulatory compliance;
 - 2.1.6. processing any enquiries or complaints raised by you and responding to any communications from you;
 - 2.1.7. transferring to third parties with whom we have a relationship in respect of our fundraising activities, such as service providers;
 - 2.1.8. transferring your Personal Data to HMRC in respect of any Gift Aid claims; and
 - 2.1.9. (if you explicitly consent) sending electronic marketing communications to you keeping you informed about data protection activities falling into any of the above categories.

- 2.2. The legal basis on which the above Processing takes place is legitimate interests.
- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information we are required to obtain your consent. Where you have already provided that consent, no further action is taken, if you have not provided such consent, please register to receive information by entering your email address at www.royalspringboard.org.uk and choosing the option to receive electronic update.
- 2.4. As the legal basis of some of the Processing the Group undertakes is obtaining your consent, please note that you may withdraw consent at any time. Should you withdraw your consent the Group shall cease to Process your Personal Data. You may revoke your consent to receive such updates by changing your preferences at www.royalspringboard.org.uk or by using the unsubscribe function included in each update.
- 2.5. The legitimate interests which permit the Processing set out above to take place are:
- 2.5.1. the need to comply with regulatory requirements in relation to your donation, for example, the need to keep donation records for a minimum of seven years for accounting purposes;
 - 2.5.2. that the Processing is reasonable in relation to the activities to which they relate;
 - 2.5.3. the Processing is such as you would reasonably expect to be undertaken by the Group in respect of the management of your donation;
 - 2.5.4. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Group and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR and/or the Data PA;
 - 2.5.5. that if you sought to terminate your consent to the Group Processing your Personal Data, we would still be required to retain information on your donation for at least seven years.

3. Source

- 3.1. Whilst you have provided some of the Personal Data which is Processed by the Charity, we have also obtained Personal Data from public information sources.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
- 4.1.1. our sub-contractors engaged in supporting the delivery of the aims of the Charity;
 - 4.1.2. where necessary, donors of the goods distributed by the Charity or recipients of goods and services distributed by the Charity;
 - 4.1.3. our regulators, including, but not limited to the Charity Commission and HMRC; and

- 4.1.4. affiliate organisations with which we work, in order to deliver the aims of the Charity.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise

your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.

- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the UK GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:
- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:

10.1.1. in writing at RNCSF, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

11.2. This Statement was last updated on 7th June 2021.

SCHEDULE 13 – VOLUNTEERS

Volunteer Subject Access Statement

DATA SUBJECT INFORMATION STATEMENT – VOLUNTEERS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the UK General Data Protection Regulation (the UK **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity prior to, during and following the course of their engagement with the Charity as volunteers.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. engaging with you as a prospective, current and former volunteer for RNCSF, and complying with RNCSF’s safer recruitment policy;
 - 2.1.2. administration in relation to the volunteering role that you undertake for RNCSF;
 - 2.1.3. providing you with information about the activities of RNCSF and its partners;
 - 2.1.4. statutory and regulatory compliance;
 - 2.1.5. processing any enquiries or complaints raised by or about you and responding to any communications from you;
 - 2.1.6. transferring to third parties with whom we have a relationship; and
 - 2.1.7. (if you explicitly consent) sending electronic marketing communications to you keeping you informed about data protection activities falling into any of the above categories.
- 2.2. The legal basis on which the above Processing takes place is:
 - 2.2.1. the legitimate interests shared by RNCSF and you as set out below; or

- 2.2.2. where it is necessary for compliance with a legal obligation to which RNCSF is subject.
- 2.3. In order to Process your Personal Data for the purpose of providing you with electronic information we are required to obtain your consent. Where you have already provided that consent, no further action is taken. If you have not provided such consent, please register to receive information by contacting us at admin@royalspringboard.org.uk and confirming that you wish to receive electronic updates.
- 2.4. Where the legal basis of the Processing RNCSF undertakes is obtaining your consent, please note that you may withdraw consent at any time. Should you withdraw your consent, RNCSF shall cease to Process your Personal Data. You may revoke your consent to receive such updates by changing your preferences by contacting the Charity using the contact details provided in this Statement or by using the unsubscribe function included in each update.
- 2.5. The legitimate interests which permit the above Processing to take place are:
 - 2.5.1. the need to comply with regulatory requirements in relation to your role as a volunteer, for example, the need to ensure that volunteers working with children are not on any registers preventing those registered working with children;
 - 2.5.2. that the Processing is reasonable in relation to the activities to which it relates;
 - 2.5.3. the Processing is such as you would reasonably expect to be undertaken by RNCSF in respect of your role as a volunteer;
 - 2.5.4. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of RNCSF and certain third parties and does not limit your interests or fundamental freedoms guaranteed by the GDPR; and
 - 2.5.5. that if you sought to terminate your consent to RNCSF Processing your Personal Data, we would still be required to retain information on your role as a volunteer for at least six years.

3. Source

- 3.1. You have provided the Personal Data which is Processed by the Charity.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. our sub-contractors providing services to us; and
 - 4.1.2. central and local government and their agencies.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other safeguard deemed suitable.
 - 5.2.4.
 - 5.2.5. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
 - 5.2.6. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.

- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is “consent”, you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner’s Office.
- 8.3. The Charity is not required to have a data protection officer under the UK GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:
- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:

10.1.1. in writing at RNCSF, 7 Grosvenor Gardens, London, SW1W 0BD;

10.1.2. by email at admin@royalspringboard.org.uk; or

10.1.3. by telephone by calling 01932 868622.

11. Further Information

11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.

This Statement was last updated on 7th June 2021.

SCHEDULE 14 – INDIVIDUALS AT PARTNER ORGANISATIONS

DATA SUBJECT INFORMATION STATEMENT – INDIVIDUALS WORKING AT PARTNER ORGANISATIONS

Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity**) processes your Personal Data in accordance with the UK General Data Protection Regulation (the UK **GDPR**) and the information set out in this Subject Information Statement.

1. Background

- 1.1. The Charity secures educational bursaries for disadvantaged young people and processes your Personal Data in order to achieve its objectives.
- 1.2. The purpose of this Subject Information Statement is to provide information to individuals whose Personal Data are Processed by the Charity during the course of their making donations to or otherwise supporting the Charity.
- 1.3. This statement applies to all prospective, current and former Partner Organisations and supporters.
- 1.4. The organisation for which you work (the **Partner Organisation**) works with the Charity to support children receiving educational bursaries from the Charity.

2. Purposes and Legal Basis

- 2.1. The Charity Processes your Personal Data and, where you have provided it, your Special Categories of Personal Data, for the following purposes:
 - 2.1.1. the management of the relationship between RNCSF and the Partner Organisation;
 - 2.1.2. the support of children receiving bursaries from the Charity;
 - 2.1.3. the support of families applying to the Charity for a bursary;
 - 2.1.4. keeping you informed about the activities of the Charity;
 - 2.1.5. regulatory and statutory compliance;
 - 2.1.6. fundraising;
 - 2.1.7. information about the donation and the activities of the Partner Organisation.
- 2.2. The legal basis on which the above Processing takes place is legitimate interests.
- 2.3. The legitimate interests which permit the Processing set out above to take place are:
 - 2.3.1. that the Processing is reasonable in relation to the activities to which they relate;

- 2.3.2. the Processing is such as you would reasonably expect to be undertaken by the Charity in relation to the provision of goods and services by the Partner Organisation;
- 2.3.3. that the Processing is necessary in respect of the activities that are undertaken and is in the interests of the Charity and the Partner Organisation and does not limit your interests or fundamental freedoms guaranteed by the GDPR and/or the Data Protection Act 2018;
- 2.3.4. that it is not possible to use the consent option as the legal basis for Processing as if this was refused, we would not necessarily have a person to contact at the Partner Organisation, which is necessary in order to manage our relationship;
- 2.3.5. it is in your legitimate interests to know about the activities of the Charity in order for the Partner Organisation to work with the Charity.

3. Source

- 3.1. Whilst you have provided some of the Personal Data which is Processed by the Charity, we may also obtain Personal Data relating to you from the Partner Organisation.

4. Recipients

- 4.1. The Charity may transfer your Personal Data to the following organisations or category of organisations:
 - 4.1.1. other partner organisations supporting the bursaries awarded by the Charity and supporting families seeking bursaries;
 - 4.1.2. where necessary, beneficiaries of the bursary awards provided by the Charity;
 - 4.1.3. our regulators and government agencies, including but not limited to HMRC and the Charity Commission; and
 - 4.1.4. affiliate organisations with which we work, in order to provide bursaries and support children and their families.

5. International Transfers

- 5.1. It is the intention of the Charity that your Personal Data will remain within the countries forming the European Economic Area (the **EEA**) or Switzerland and countries where the UK or the European Union has decided that the country has adequate data protection laws in line with those in the European Union.
- 5.2. Your Personal Data will only be transferred outside of the EEA or a country which has been declared as having adequate data protection laws where:
 - 5.2.1. the transfer is necessary for the performance of any contract with you;
 - 5.2.2. you have entered the information into our Website and the information has been transmitted from your server to our server using systems based outside of the EEA;
 - 5.2.3. Where appropriate safeguards are in place which may be the EU standard contractual clauses or the UK standard contractual clauses or any other

safeguard deemed suitable.

- 5.2.4. we have entered into an appropriate contract protecting your rights and freedoms, which is enforceable by you or the data protection authorities; or
- 5.2.5. we have obtained your explicit consent.

6. Storage

- 6.1. We will generally store the Personal Data that we hold in relation to you for the duration of our relationship with you and for seven years after that relationship ends.

7. Your Rights

- 7.1. You have a right to obtain from the Charity confirmation as to whether or not your Personal Data are being Processed and, if your Personal Data are being Processed by the Charity, to access the Personal Data and the specific information set out in Article 15 of the UK GDPR. To access your Personal Data please contact admin@royalspringboard.org.uk. Please note that we will not provide any Personal Data to you until you have provided evidence to us to establish your identity. This may include a copy of your passport or other identification document. We will only provide information to you at an address which we have verified as belonging to you.
- 7.2. You have a right to rectification of any inaccurate Personal Data which we Process about you, or where Personal Data is incomplete to have the information completed. To obtain rectification or completion, you will need to provide the correct information to the Charity. An explanation of why you believe the information is inaccurate or incomplete would also be of assistance.
- 7.3. Where certain grounds, as set out in Article 17(1) of the UK GDPR, apply, you will be entitled to have the Charity erase certain Personal Data relating to you. Where you wish to exercise your right of erasure, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you erased.
- 7.4. Where certain grounds, as set out in Article 12(1) of the UK GDPR, apply, you will be entitled to have the Charity restrict the Processing of certain Personal Data relating to you. Where you wish to exercise your right to restrict Processing, please contact admin@royalspringboard.org.uk setting out the grounds under which you would like the Personal Data the Charity holds about you restricted.
- 7.5. In certain circumstances, where the legal basis of the Processing undertaken by the Charity is "consent", you have a right to request the Charity transfers your Personal Data to a third party. If you wish to exercise your right to data portability, please contact admin@royalspringboard.org.uk.

8. Complaints

- 8.1. If you have any complaint about the Processing of your Personal Data undertaken by the Charity, please contact admin@royalspringboard.org.uk.
- 8.2. Please note that you have a right to lodge any complaint about the Processing of your Personal Data by the Charity by contacting the Information Commissioner's Office.

- 8.3. The Charity is not required to have a data protection officer under the GDPR and one has not been appointed, therefore please address all communications in relation to Personal Data to admin@royalspringboard.org.uk.

9. Definitions

- 9.1. The following terms have the following meaning in this Statement:

- 9.1.1. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 9.1.2. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 9.1.3. **Special Categories of Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

10. Contact

- 10.1. The Charity can be contacted:

- 10.1.1. in writing at RNCSE, 7 Grosvenor Gardens, London, SW1W 0BD;
- 10.1.2. by email at admin@royalspringboard.org.uk; or
- 10.1.3. by telephone by calling 01932 868622.

11. Further Information

- 11.1. It is not intended that the Charity will undertake any further Processing of your Personal Data other than that which is set out in this Statement. However, if this position does change, the Charity will provide you with further information.
- 11.2. This Statement was last updated on 7th June 2021.

SCHEDULE 15 – LEGITIMATE INTERESTS ASSESSMENT FORM**RNCSF Data Protection Legitimate Interests Assessment Form****Part 1: Purpose test**

You need to assess whether there is a legitimate interest behind the Processing.

- Why do you want to Process the data?
- What benefit do you expect to get from the Processing?
- Do any third parties benefit from the Processing?
- Are there any wider public benefits to the Processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the Processing?
- Are you complying with any specific data protection rules that apply to your Processing (e.g. profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the Processing?

Part 2: Necessity test

You need to assess whether the Processing is necessary for the purpose you have identified.

- Will this Processing actually help you achieve your purpose?
- Is the Processing proportionate to that purpose?
- Can you achieve the same purpose without the Processing?
- Can you achieve the same purpose by Processing less data, or by Processing the data in another more obvious or less intrusive way?

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

Nature of the personal data
<ul style="list-style-type: none"> • Is it special category data or criminal offence data? • Is it data which people are likely to consider particularly 'private'? • Are you Processing children's data or data relating to other vulnerable people? • Is the data about people in their personal or professional capacity?
Reasonable expectations
<ul style="list-style-type: none"> • Do you have an existing relationship with the individual? • What's the nature of the relationship and how have you used data in the past? • Did you collect the data directly from the individual? What did you tell them at the time? • If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you? • How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations? • Is your intended purpose and method widely understood? • Are you intending to do anything new or innovative? • Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation? • Are there any other factors in the particular circumstances that mean they would or would not expect the Processing?

Likely impact	
<ul style="list-style-type: none"> • What are the possible impacts of the Processing on people? • Will individuals lose any control over the use of their personal data? • What is the likelihood and severity of any potential impact? • Are some people likely to object to the Processing or find it intrusive? • Would you be happy to explain the Processing to individuals? • Can you adopt any safeguards to minimise the impact? 	
Can you offer individuals an opt-out?	Yes / No

Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this Processing?	Yes / No
Do you have any comments to justify your answer? (optional)	
LIA completed by	
Date	

What's next?

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.

Include details of your purposes and lawful basis for Processing in your privacy information, including an outline of your legitimate interests.

SCHEDULE 16 – TEMPLATE DATA SUBJECT ACCESS REQUEST RESPONSE

Template Data Subject Access Request Response

[Date]

Private and Confidential

[Insert Name]

[Insert Address]

[Insert Address]

Dear [insert name]

Data Protection Act 2018 - Subject Access Request

Following your request for information under the UK General Data Protection Regulation (the UK **GDPR**) we are writing to confirm that Royal National Children's Springboard Foundation (**RNCSF** or **we**) does process your personal data.

As required by the UK GDPR we have set out in this letter and the attached Schedule:

- the classes of personal data which we process in relation to you (e.g. your name and your contact details);
- a description of the personal data of which you are the data subject in respect of each class;
- the purposes for which each class of your personal data are processed;
- where known, the source of any personal data; and
- the recipients and classes of recipients to whom they are disclosed.

You made the following request to RNCSF (**your Request**):

- [Insert request]

We can confirm that we have not undertaken any automated processing in relation to your Personal Data (as defined by the UK GDPR). Therefore, we have not included in this letter any information as to how automated decision would be taken or the logic involved in any automated decisions.

As you may be aware there is no statutory right for you to have a copy of any documents held by RNCSF which relate to you. The rights granted by the UK GDPR are to be given a description of the personal data processed by and a copy of the information in permanent form.

As the UK GDPR does not require us to provide copies of documents in which personal data are contained, we are not prepared to disclose such documents in response to your request, although we will provide the personal data contained within such documents. If you wish to obtain access you will have to apply to the Court for disclosure of such documents.

We have reviewed all electronic systems and established that the personal data processed by RNCSF are limited to the information specified in the Schedule. This information has been collected from:

- you;
- [insert]; and
- [insert].

We have specified in the Schedule:

- a description of the personal data which we process in relation to you;
- the personal data themselves;
- the purposes for which those personal data are processed by RNCSF; and
- the recipients of any of those personal data which are processed by RNCSF.

Further, whilst RNCSF has conducted a number of searches to establish all of the personal data relating to you that it processes, due to the number of different areas in which RNCSF operates and without anymore specific guidance from you as to where all such data may be located, it is possible that there are data processed in respect of you which RNCSF has not been able to locate. It is likely that such personal data would be held in a manual format which is not part of a relevant filing system and this is the reason why it has not been able to be located. However, we do consider this to be unlikely.

Please refer any queries you may have in respect of this reply to your Request to the Head of Human Resources.

Yours [faithfully] [truly]

[simply sign using the company name as a signature, no need for a person to sign]

Royal National Children's Springboard Foundation

Royal National Children’s Springboard Foundation [Data Subject’s name] Data Subject Access Request – [Date of request]		
<u>Personal Data</u>	<u>Purposes</u>	<u>Recipients of information</u>
<u>Name:</u> [insert] -	Internal administration	Clients Suppliers Consultants Providers of employee services and benefits [Professional regulators] Professional advisors
<u>Address:</u> [insert]	Internal administration	Providers of employee services and benefits [Professional regulators] Professional advisors
<u>Contact numbers:</u> [insert]	Internal administration	Providers of employee services and benefits Professional advisors
<u>E-mail address:</u> [insert]	Internal administration	Providers of employee services and benefits Professional advisors
<u>Qualifications:</u> [insert]	Internal administration	Professional Regulators Professional advisors

<u>Profession:</u> [insert]	Internal administration	Professional regulators Clients Suppliers Consultants Professional advisors
Medical Information [insert]	Internal administration Sickness records	Professional advisors Professional regulators Providers of employee services and benefits [Occupational health consultant]
<u>National Insurance Number:</u> [insert]	Employment administration Statutory compliance Confirmation of permission to work in the UK	HM Revenue and Customs Payroll Pensions Professional advisors
<u>Nationality:</u> [insert]	Internal administration	Professional advisors
<u>Education</u> [insert]	Internal administration Confirmation of relevant details provided for job application Decision to offer conditional employment	Professional advisors
<u>Current and Former Employers:</u> [insert]	Internal administration	H M Revenue and Customs Professional advisors Institutions themselves to obtain references.

<u>Photograph:</u> [insert] OR [Contained within copy of passport]	Internal Administration Identification Procedures for confirmation of identity	Professional advisors
<u>Passport Number:</u> [insert]	Identification purposes for confirmation of identity	UKPA – confirmation that passport genuine Professional advisors
<u>Next of Kin Details:</u> [insert]	Employment administration and emergency planning	Professional advisors Next of kin (if required) Emergency Services (if required)
<u>Ethnic Origin:</u> [insert]	Equal Opportunities	Professional advisors
<u>Bank Details:</u> [insert]	Internal administration Payment for employment	Payroll HM Revenue & Customs Professional advisors
<u>Medical Report:</u> [insert]	[Confirmation of fitness for work in respect of offer of Employment]	Professional advisors
<u>Interview Comments:</u> [insert] OR [Destroyed in line with HR Document Management Procedure – 1 year after vacancy completed and closed.]	Decision on offering position	Professional advisors
<u>Observations:</u> [insert] OR [Destroyed in line with HR Document Management Procedure – 1 year after vacancy completed and closed.]	Internal consideration	Professional advisors

<u>References:</u> [insert]	Internal consideration Compliance with condition of offer of employment Internal administration	Professional advisors Third parties seeking a reference
<u>Opinions</u> [insert]	Internal administration	Professional advisors [Professional regulators]

[Please insert any other headings and personal data identified as the result of the search. Purposes and recipients are only a guide. If others are identified, they should be included].

SCHEDULE 17 – RETENTION OF RECORDS RECOMMENDATIONS

RETENTION OF RECORDS

TYPE OF RECORD	RECOMMENDED RETENTION TIME
HUMAN RESOURCES	
Unsuccessful applicants' details, application Forms, CV's and other selection records.	Maximum of 6 months after applicants notified of outcome
Application Form	Duration of employment
Health & Safety surveillance and assessment records	40 years from time of assessment
Details of Injuries or Accidents Reports/Records	12 years from time of accident occurring unless a case is involved in a legal Process
Summary of employment records/details of terms and conditions	6 years after employee has left employment
Appraisal records/objectives/performance reviews or targets agreed/Individual Grievance records	6 months after employee has left employment
Disciplinary records	Reprimand -2 years Severe Reprimand – 4 years Suspension – 6 years Transfer or downgraded – 6 years Final warning – duration of attached punishment Summary Details of Disciplinary Hearings – duration of employment
Pay, Tax & N.I. benefits information (Inland Revenue requirements)	6 years after employee has left employment
Development/training needs and records of completed activities	6 years after the Employee has left the Employment of RNCSF
Annual Leave/Working Hours	2 years
Initial Competence Assessments/ Psychometric Tests	12 months -
References	3 years
Sickness Records	Duration of employment and up to 6 years after employee has left employment
Unpaid/Special Leave	3 years
Parental Leave	5 years

Adoption Leave	5 years
Closed Circuit Television	31 days or 6 years if required for Criminal or Civil Litigation or until the conclusion of any associated litigation, which would include up to the conclusion of the appeal Process.
Investigation files for breach of data protection	7 years
OTHER AREAS	
Supporters and Donor Data <ul style="list-style-type: none"> - contact details - donation details - marketing records and reports 	Supporters often take a break from their support and return to RNCSF therefore, supporters details will be retained for ten years from their last contact with RNCSF.
Contacts Data <ul style="list-style-type: none"> - contact details - marketing records and reports - sales notes and records - accountancy database containing Transactions of sales and purchases - information gathered as part of surveys conducted by RNCSF - information lawfully obtained from other partners 	7 years from last contact.
Applicants	7 years from last contact
Supported Children	Supported children will be alumni or RNCSF and it is hoped that they will remain in contact for life. A record of all supported children shall be kept permanently. Records will be reviewed 7 years from the point at which the supported child reaches 18 and records which are no longer relevant shall be removed, after which there shall be a three year review mechanism to ensure all data is relevant and up to date.
Parents/Guardians of Supported Children	Records relating to the parents shall be reviewed at 7 years and non-relevant information shall be deleted or otherwise destroyed. The review shall continue every three years thereafter. The names of supported parents / guardians shall remain on file for a minimum of 50 years to cover additional applications and to be able to link applications from other family members.

Donors	7 years from last contact, unless reasons remain to keep the donor on records, for example a 10 year donation cycle or naming rights.
Medical Records	In accordance with the Medical Records Act 1988
Any information held will be destroyed within 12 months after the stated retention period	

Privacy Policy

SCHEDULE 18 – WEBSITE PRIVACY POLICY

Royal National Children’s SpringBoard Foundation This is the privacy policy of Royal National Children’s SpringBoard Foundation, a company limited by guarantee registered in England and Wales under number 10180187 which is also a charity registered with the Charity Commission for England and Wales under number 1167491, whose registered address is at 6th Floor, Minster House, 42 Mincing Lane, London, EC3R 7AE (the **Charity** or **We**).

The Charity processes personal data as defined by the UK General Data Protection Regulation (the UK **GDPR**). Personal data are collected on this site through forms and 020 Cookies. The Charity processes your personal data to achieve its objectives. In order to carry out these activities, the Charity collects and holds necessary information.

The Charity recognises your right to privacy and wants you to be informed about the way in which we may hold information about you. When we refer to “You” or “Your” in this policy we are referring to a user of this Website (www.royalspringboard.org.uk).

Information Which May Be Held About You

Depending on your relationship with the Charity, we may hold personal data about you. We use the same terms in this Policy as in the UK GDPR and words defined in the UK GDPR have the same meaning in this Policy. Should you not understand any terms, please contact the Charity using the contact information below.

Under the UK GDPR we are required to provide you with certain information. The requirement to provide you with the information is set out in Article 13 of the UK GDPR – we refer to the statement in which the information is provided as a “privacy notice”.

We provided you with a relevant privacy notice either when you provided your data (or as soon as possible after collection) or the last time we made a change when it would have been sent to you.

Security and Restrictions on Sharing Information about You

The Charity takes your privacy seriously. We will never sell your personal data to any third party and we take precautions to keep it secure. Your data may be transferred by us to third parties in accordance with the privacy notice.

Use of Cookies

The Charity has cookie policies in place on their respective websites. Use of Cookies complies with the Privacy and Electronic Communications Regulation and full details can be found in our [Cookie Policy](#).

European Economic Area (‘EEA’)

Monitoring of Telephone Calls and E-Mails

Your telephone calls and e-mails to us may be recorded and monitored for quality control purposes and to provide a record of communications with the Charity. We may also intercept communications made to individual members of staff or consultants at the Charity when this is required for business purposes.

Other Websites

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The Website contains links to other websites. The Charity is not responsible for the privacy policies and practices or the content of any websites which are linked to the Website. The Charity encourages parents and guardians to use the parental control tools available from online services and software manufacturers to help supervise their child's online activities. The Charity shall only obtain the data of individuals if it is permitted by the laws of the United Kingdom and shall take steps to ensure that children from jurisdictions other than the United Kingdom cannot use the Website.

Updates

Please check this page periodically for changes as the Charity reserves the right, at its discretion, to change, modify, add, or remove portions of the Privacy Policy and the Website at any time. Your continued use of the Website following the posting of any changes to this Policy will mean that you accept such changes.

Privacy Notices

We are required to provide you with information as to how we hold and process your personal data. We do this through a privacy notice or information statement under Article 13 of the UK GDPR. We currently have notices for the following groups, please click on the most appropriate description to you:

- Supported Young People;
- Supported Parents and Guardians;
- Applicants;
- Employees;
- Volunteers and Trustees;
- Contractors, Consultants and Agency Workers;
- Supporters and Donors
- Individuals working with partner organisations;
- Suppliers
- General Contacts.

Please remember that if you fall into more than one category more than one Privacy Notice may apply to you. To ensure that the personal data that the Charity holds about you is up to date, please let us know if there are any changes to your personal data.

Contact Us

If you have any queries relating to this Policy, please feel free to contact us by clicking on the link [link to Contact Us] or emailing us at admin@royalspringboard.org.uk or by telephone on 01932 868622.

This Policy was last updated on 7th June 2021.