

# Torchbearers Trust - Privacy and GDPR Policy

The Torchbearers Trust exists to advance the Christian faith. It operates primarily in Bridgnorth and the surrounding area, but also supports a number of Christian ministries elsewhere in the UK and overseas.

This privacy and GDPR policy explains how the Trust processes any personal information it collects.

## Policy Statement

We are committed to the protection of the rights and freedoms of individuals in accordance with the provisions of the General Data Protection Regulations (GDPR). We will comply fully with the requirements of the GDPR and will follow procedures which aim to ensure that all persons who have access to any personal data held by or on behalf of the Trust are fully aware of, and abide by their duties and responsibilities under the legislation.

In order to operate efficiently, we process information about our staff and about people with whom we work. These may include current, past and prospective employees, service users, volunteers, trustees, donors and other supporters.

We will ensure that all personal information is processed properly however it is collected, retained, used or otherwise processed; on paper, in computer records or recorded by any other means. Accurate, proportionate and up to date records are kept to ensure a good framework of service delivery to users, support and supervision for volunteers and employees, and to comply with employment, charity and any other legal requirements.

## Personal Data

Personal Data is defined within the GDPR as 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 names, addresses, telephone numbers, job titles, date of birth, salary, ID numbers, location data, online identifiers, genetic data or biometric data.

## GDPR Data Protection Principles

The Trust will comply with the data protection principles of the GDPR to ensure all personal data is:

- Processed lawfully, fairly and in a transparent manner;
- Obtained for specified, explicit and legitimate purposes only;
- Only processed in a way that is compatible with the purpose(s) for which it was collected;
- Adequate, relevant and limited to what is necessary for the relevant purpose(s);
- Accurate and up to date;
- Kept for no longer than is necessary for the purpose(s) for which the data is processed;
- Processed in accordance with the data subject's rights under the GDPR;
- Kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage; and
- Not transferred outside of the United Kingdom without appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for data subjects are available.

## Data Held

### Volunteers

Some projects are run with the help of volunteers. Personal data about volunteers is held on spreadsheets to facilitate the successful organisation of each project. Application forms are retained in paper form in a secure filing cabinet.

### Employees

Personal data for job applicants, employees and trainees is processed for a variety of purposes including:

Recruitment, payroll, pension administration, accounting, work allocation and monitoring, performance reviews, diary management and other employment related purposes.

### **Supporters and suppliers**

Mailing lists are maintained of supporters who the Trust keeps informed of its various projects and activities. Data is also held relating to donors and suppliers to satisfy regulations for accounting, tax and other administrative purposes.

### **Service Users**

The details under this heading in regard to service users are different for each project, as follows:

#### **Pastoral and Prayer Support**

Where appropriate contact details are maintained for people being supported by Trust staff.

#### **Financial Support**

Details are stored for recipients of financial support from the Trust, both individual and organisations.

#### **Filling Station**

Monthly meetings are open to anyone. An email list is maintained for mailing purposes and people choose to add their name and email address to this list if they wish to receive emails informing them of meetings.

#### **Catalyst Youth Trust**

This Project exists to encourage and equip existing Christian youth and schools work.

We store contact details for the people we work with.

The Project website has a resource ordering facility and data is stored in relation to people who place orders through this facility.

Records of mentoring and student support sessions with young people are stored securely in a 'cloud' based database.

## **Sharing Information**

We will not normally share any information we hold to others without prior consent, unless one of the following exceptions apply. We may disclose information we hold:

- If it is necessary for law enforcement or similar purposes;
- If it is necessary in a medical emergency
- As a necessary part of providing our service(s) or contacting individuals - for example, by using a third party such as mail-chimp to process our communications;
- As a necessary part of ensuring we comply with our legal obligations

## **Retaining and Deleting Information**

We will take all reasonable steps to ensure that the information we hold is kept secure. We will only hold personal data for as long as it is required for the delivery of our services or to meet our legal obligations in relation to other legislation such as safeguarding, accounting, tax etc. Deleting information may involve either the removal of the data or its anonymisation, meaning that it no longer continues to be identifiable to an individual.

A request for information to be deleted may be sent using the contact details below.

## **Subject Access to Information and Correction**

You have the right to request details of the information we hold about you. To do this, you should write to the address below, enclosing a cheque for £10 made payable to Torchbearers Trust. We are allowed by law to require this fee prior to dealing with your request, to reflect the administrative costs involved. It will help us to process your request if you can be specific about what information you require, otherwise we may need to contact you again to clarify this. We will respond to your request within 40 days of receiving both the written request and the required fee. You have the right to request that we update or correct any information we hold about you. Please contact us using the details below to let us know what needs correcting.

## **Cookies**

Our use of websites is currently very limited but may increase in the future.

Our websites may record some of your personal information, for example, by logging your IP address or the location of your computer or network. It may also record information about you that you enter into online forms.

Other data may be collected anonymously about your use of our site from cookies. Cookies are small text files that are placed on your computer by websites that you visit. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [allaboutcookies.org](http://allaboutcookies.org). We may use cookies:

To establish the needs of visitors and customise the content of our websites;

To process any forms, requests or applications you send;

For internal administration and analysis.

## **Other websites**

Our websites sometimes contain links to other websites. This privacy policy only applies to the Trust's websites so when you link to other websites you should read their own privacy policies.

## **Changes to this Privacy & GDPR Policy**

We keep our privacy policy under regular review and we will publish any updates on our website:

[www.catalystyouthtrust.co.uk](http://www.catalystyouthtrust.co.uk)

This privacy policy was last updated on 8<sup>th</sup> March 2021

## **How to Contact the Trust:**

By email: to [khbowley@gmail.com](mailto:khbowley@gmail.com)

By mail: to the address below

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