Privacy Policy

Approved by the Board on 6 December 2022

Contents

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Privacy Policy

Introduction

This Policy is intended to express Caplor Horizons' commitments on the privacy of personal data in line with its values and in response to current and future data protection laws. It describes the legal position and Caplor Horizons' approach, followed by a section on the Handling of DBS Certificate Information Policy, a specific policy needed for Disclosure and Barring Service (DBS) checks. The Commitment operates within Caplor Horizons. Every requirement of this Policy applies to both The Commitment and the rest of Caplor Horizons.

The Legal Position

The Data Protection Act 2018 controls how personal information is used by organisations, businesses and the government.[1] This Act expresses the UK General Data Protection Regulation (UK GDPR). Everyone responsible for using personal data has to follow strict rules called "data protection principles". They must make sure the information is:

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Under the Act, charity newsletters, fundraising appeals and campaigning material to people using their contact details count as direct marketing. A lawful basis, or "consent", is needed to process an individual's data to send direct marketing. Consent essentially means someone has said "yes".

For consent to be valid it needs to be:

- Freely given, specific, informed and unambiguous
- Given by a statement or clear affirmative action
- Able to be withdrawn as easily as it is given
- Proven by the data controller (the person who determines the purposes for which and the manner in which any personal data are processed)

There are different ways for individuals to give their consent such as choosing a "yes" option on a website, ticking a box on a paper form, orally or through action.

The lawful basis on which Caplor Horizons processes personal data (including special category data such as ethnic origin and political views) is that the individual has explicitly given consent and/or we have a legitimate interest.

[1] www.gov.uk/data-protection

Caplor Horizons' Approach

Caplor Horizons' approach to handling personal data is guided by the legal position and based on the six data protection principles listed above. We have also been guided by legal advice and advice such as that of the Information Commissioner's Office.[2] When seeking to acquire or process personal data, The Commitment makes a pledge as shown in the box below. This privacy statement is specific to The Commitment. The statement also applies to other parts of Caplor Horizons with the words "Caplor Horizons" replacing "The Commitment" and excluding item 2. In the penultimate paragraph the contact email address is replaced by any of ian@caplorhorizons.org, lorna@caplorhorizons.org and rosie@caplorhorizons.org.

The Commitment will respect your privacy as follows in relation to all the personal data we (The Commitment) receive from you:

1. The Commitment will file and process your data for purposes that include sending you newsletters and other information, fundraising and collating data on our supporters.
2. In the case of The Commitment the purposes include showing your local politicians the need for urgent action. When sharing your Commitment with your local politicians we use your first name, written message explaining why you have made The Commitment and uploaded photos (if any). We may also share your postcode along with other postcodes in your area, not linked to your name, to send to a local politician (e.g. your MP) to show the scale of support in your area. We may occasionally send your postcode, linked to your first name and your Commitment, to a local politician on condition that this information is not shared further. We sometimes need to do this with a few names in order to secure a meeting with a politician. We shall only share demographic data in an aggregated and anonymous form
3. The following people will have access to your data if needed: the staff of The Commitment and volunteer advisors working with staff.
4. The data will not be given to anyone else without your permission. For example, if given permission to do so, we may share your Commitment externally with your first name, e.g. on social media
5. The data will be stored securely in a password-protected folder.
6. The data will only be stored by The Commitment as long as they may be needed. They will then be deleted.
7. Any processing of the data will preserve your anonymity in any results shared with people other than the staff and advisors of The Commitment.
8. The data will not be transferred to another country beyond the locations of our servers.
9. You can ask The Commitment to supply to you the personal data that we hold on you at any time and you can ask for it to be corrected.
10. The data can be deleted at any time at your request.

Please let us know if you have any concerns about this by contacting us at the following address: info@thecommitment.uk. We may make reasonable changes to the details of this pledge without consulting you further.

If you have a complaint to make about The Commitment's use of your personal data, and are not satisfied with The Commitment's response to your complaint, you can contact the Information Commissioner's Office (ICO) at: https://ico.org.uk/make-a-complaint/.

[2] ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/

Currently at Caplor Horizons data are collected from individuals for the following purposes:

1. For sending our regular update, we collect name, email address, job title and organisation.
2. For managing contact with Staff, Trustees and Advisors, we collect data such as date of birth, address, next of kin and passport information used for travel logistics.
3. For the purpose of collating Commitments, we collect data from Committers such as gender, year of birth, ethnicity and education level.
4. For fundraising and grants, where we receive donations or we think an individual may be interested in donating to us.
5. For sending newsletters and tracking environmental actions across different parishes, we collect names, email addresses and postcodes for the Great Collaboration Portal.

These data are collected and added to our secure database after consent has been given.

Fundraising

Data may be collected from individuals directly, from trusted partners in the charity sector, or from publicly available sources.

We will process these data on the basis of consent and/or our legitimate interest in receiving fundraising as a charity. We may also use such data for our contractual and/or legal obligations in reporting on our donations.

Information from third parties

We sometimes receive personal data about individuals from third parties. We may use third parties to help us conduct research and analysis on personal data.

Occasionally, we may collect information about certain supporters (e.g. particularly well known or influential people) from public sources. This could include public databases (such as Companies House records), news or other media.

Handling of DBS Certificate Information Policy

1. General principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Caplor Horizons complies fully with the DBS code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

Through its Privacy Policy, Caplor Horizons also complies fully with its obligations under the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

2. Storage and access

Certificate information should be kept securely with access strictly controlled and limited to those who are entitled to see it as part of their duties. In the case of electronic records this means password protection of the folder and any back-up folder. Paper records are kept in lockable, non-portable, storage containers.

3. Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

4. Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

5. Retention

Once a recruitment (or other relevant) decision has been made, or a Trustee or Advisor has been confirmed in their role, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

6. Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by deletion of electronic records and shredding, pulping or burning paper records. While awaiting destruction, certificate information on paper will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the decision taken concerning the individual's role.