



Data Protection Policy

March 2026

Last review completed by:

Board of Trustees

Date of last review:

March 2026

Next review due:

March 2027

Document owner:

J Holmes

Distribution list:

Board of Trustees

1. Purpose

Both Sides Foundation is committed to protecting the personal data of everyone we engage with, including beneficiaries, staff, trustees, volunteers, contractors and partners.

This policy explains how we collect, use, store and protect personal data in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

2. Scope

This policy applies to all staff, whether permanent, temporary or agency, Trustees and volunteers and all personal data processed by the Foundation in any format, including digital, paper, audio or visual records.

3. Key Definitions

- **Personal Data** – information relating to an identified or identifiable individual (e.g. name, contact details, photograph)
- **Special Category Data** – sensitive personal data such as health information, ethnicity, religion or sexual orientation, which requires additional protection
- **Processing** – any action carried out on personal data, including collection, storage, use, sharing or deletion
- **Data Subject** – the individual whose personal data is processed

4. Data Protection Principles

Both Sides Foundation processes personal data in accordance with the principles set out in Article 5 of UK GDPR. Personal data must be:

- Processed lawfully, fairly and transparently
- Collected for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Kept secure using appropriate technical and organisational measures

5. Roles and Responsibilities

- **Board of Trustees:** The Board has overall responsibility for data protection compliance and accountability.
- **Data Protection Lead:** The Data Protection Lead is responsible for day-to-day oversight of data protection practices, maintaining records of processing activity, and reporting any significant risks or breaches to the Board.

- **Staff, Trustees and Volunteers:** All individuals working with or on behalf of the Foundation must comply with this policy and report any data protection concerns or incidents promptly.

6. Lawful Bases for Processing

Personal data will only be processed where a lawful basis applies. These may include:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

The lawful basis for each category of processing is documented in the Foundation's records of processing activity. Where consent is relied upon, clear and recorded opt-in consent will be obtained.

7. Data Subject Rights

Individuals have a number of rights under the UK General Data Protection Regulation in relation to their personal data. These include the right to be informed about how their data is used, the right to access their personal data, and the right to request that inaccurate or incomplete data is corrected. In certain circumstances, individuals may also request the erasure of their personal data, restrict how it is processed, or receive a copy of their data in a portable format. Individuals have the right to object to certain types of processing, as well as rights relating to automated decision-making and profiling where these apply.

Requests to exercise these rights should be made in writing to the Data Protection Lead and will normally be responded to within one month.

8. Data Retention

Personal data is retained only for as long as necessary for the purpose for which it was collected, and in line with legal, regulatory or contractual requirements.

The Foundation maintains a data retention schedule which sets out retention periods for different categories of data, including employment, financial and beneficiary records.

9. Data Security

Both Sides Foundation takes appropriate steps to protect personal data, including:

- Secure access controls and password protection
- Appropriate use of encryption and backups

- Secure storage of paper records
- Limiting access to personal data on a need-to-know basis
- Data protection awareness for staff, trustees and volunteers

10. Data Breaches

A personal data breach is any incident resulting in the accidental or unlawful loss, destruction, alteration or unauthorised disclosure of personal data.

- All suspected breaches must be reported immediately to the Data Protection Lead
- Serious breaches will be reported to the **Information Commissioner's Office (ICO)** within 72 hours where required
- A record of breaches will be maintained

11. Data Sharing and Transfers

Personal data will only be shared with third parties where necessary and appropriate, and subject to suitable safeguards or data processing agreements.

- The Foundation does not sell personal data
- Where data is transferred outside the UK, appropriate safeguards will be put in place

12. Training and Awareness

All staff, trustees and volunteers are expected to understand their data protection responsibilities. Guidance and training will be provided as appropriate to support compliance with this policy.

13. Review

This policy is reviewed annually, or sooner if required due to changes in law, regulation or organisational practice.

Signed

Signed

Neil Bolding
Position: Chair of Trustees
Date: March 2026

James Holmes
Position: Trustee and Governance Lead
Date: March 2026