



## Data Protection Policy

This policy sets out the obligations of Sea-Change Projects Ltd, known as Sea-Change Sailing Trust regarding data protection and the rights of the young people who sail with the Trust and their families, volunteers and supporters, contractors, stakeholders, donors, staff, and Trustees in respect of their personal data under the General Data Protection Regulation.

The trust is committed to both the law and the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

Last updated	18.8.21
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### Definitions

<b>The Trust</b>	means Sea-Change Projects Ltd known as Sea-Change Sailing Trust, a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Judy Harrison, Assistant Executive Officer.

#### 1. Data protection principles

The Trust is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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 not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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 subject to

implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. 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. General provisions**

- a. This policy applies to all personal data processed by The Trust.
- b. The Responsible Person shall take responsibility for The Trust's ongoing compliance with this policy. Judy Harrison, Assistant Executive Officer is that person responsible for personal information at The Trust.
- c. This policy shall be reviewed at least annually.
- d. The Trust shall register with the Information Commissioner's Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. The Trust shall ensure its processing of data is lawful, fair and transparent.
- b. This policy together with data archives shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to The Trust shall be responded to in a timely manner.

## **4. Lawful purposes**

- a. All data processed by The Trust must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent shall be clearly available and systems should be in place to ensure such revocation is reflected accurately in The Trust's systems.

## **5. Data minimisation**

- a. The Trust shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. The following personal data may be collected and held by the Charity:
  - Name, age, address, and medical data of those joining a voyage with The Trust, together with emergency contact details of their next of kin.
  - Personal information of Donors to process donations and payments.
  - Personal information on Staff for Payroll purposes
  - Personal information on staff, contractors, and volunteers for DBS purposes
  - Personal contact information on staff, volunteers, contractors, and Trustees to ensure the smooth running of the Trust.
  - Any other information in the pursuit of the Trust's charitable aims.

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Trust shall have in place an archiving policy ensuring that no personal data will be retained by The Trust beyond a period of seven years after it has been recorded unless The Trust maintains a current working relationship with that person.

## **8. Security**

- a. The Trust shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security shall be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Trust shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO without delay.