

Data Protection Policy

Friends – Play for Disabled Children

Last updated	20 th October 2020
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Definitions

Charity	means Friends – Play for Disabled Children, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Paula Jones.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity 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.”

How and why we will collect your data.

1) The following data will be captured about yourself and family upon registration with Friends, Play for Disabled Children.

- Email address
- Name, address and contact details of parents/carers/guardians
- Emergency contact details
- Whether you are requiring transport to events
- Childs details including age and any diagnosis/medical issues.
- Whether the child is wheelchair dependent
- Permissions for photographs
- For funding information, whether you belong to a certain housing association.

When booking onto an event, we will be asking for the following information;

- Email address
- Names of those wishing to attend the event
- Number of places required
- For certain events we may request for age and names of children in order to appropriately allocate extras e.g. for presents from Santa.
- Permissions for photographs
- Accessibility/mobility issues, if required.

2) By joining the charity Friends, Play for Disabled Children you are opting in to belong to the Facebook group 'Friends, Play for Disabled Children Events' where you will be able to see the events being organised by the charity. An email will also be sent out each time an event is organised and is ready to be booked onto.

3) If you wish to opt out of receiving emails then please opt out on the registration form. If you wish to op-out after this point, then please email events@friendsplay.org.uk or use the opt out link on the emails sent out to you.

4) Information is stored by the Charity so that we can custom book events that are suitable to the families that are using the services of the charity. The details of the family will also be used within funding applications however this will be overview information and no identifiable information about any family will be used.

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to

the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

5. Data minimisation

- a. The Charity 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 charity will annually email the details we store about yourself and your family so that you are able to add, amend or delete any information as required.

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.
- c. The charity will annually email the details we store about yourself and your family so that you are able to add, amend or delete any information as required.

7. Archiving / removal

- a. Personal data will be kept for as long as you are a member of the charity and for up to seven years after the date of leaving.
- b. Event booking data will be held for period of seven years. After this time, the data of that event will be deleted.
- c. The charity will annually email the details we store about yourself and your family so that you are able to add, amend or delete any information as required.
- d. If you wish to leave the charity and be removed from all records, then please email friendsplaybooking@gmail.com

8. Security

- a. The Charity 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 should 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.
- e. The registration form and booking forms for events will all be completed through Google Forms and all information will be saved on their servers. This information will only be accessed through secure login details which only Paula Jones, Melanie Battye and

Emma Roberts will have the details for. We will be using Gmail accounts in order to email you and also the Gmail add-on GMASS in order to set up automated emails.

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 Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY