

# Free Cakes for Kids Swindon

## Data Protection Policy

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### Introduction

Although Free Cakes for Kids Swindon (FCFK Swindon) is a very small, not-for-profit organisation, we do handle personal data and it's important that we do this in a way that is confidential and reassuring to our partner agencies and volunteers.

We're described as a Data Controller under the Data Protection Act and the General Directive on Data Protection (GDPR), which means that we determine the purposes for which personal information is used.

We keep certain information about volunteers, referral partners and service users to allow us to monitor our performance, achievements and to operate effectively. We also need to process personal information so that volunteers can be recruited and informed of cake requests to provide the service we offer to families.

To comply with legislation, information must be collected and used fairly, stored securely and not disclosed to any person unlawfully. To do this, we must comply with the principles set out in the Data Protection Act 1998 and the 2018 General Directive on Data Protection (GDPR).

This policy outlines how we do this and it's important that all volunteers read and fully understand any responsibilities they have in handling personal data. Our Privacy Notice should also be read in conjunction with this policy.

It's worth noting that information that's already in the public domain is exempt from the 1998 Act and GDPR.

Any volunteer or service user who considers that this policy has not been followed in respect of personal data about themselves should first raise the matter with Laura Cain, Founder.

## **1. Data protection principles**

Under GDPR, Personal Data we process should be:

- Lawful, fair and transparent
- Collected for specific and legitimate purposes
- Limited to just what is necessary
- Accurate
- Kept only for as long as needed
- Appropriately secure

## **2. General Provisions**

2.1 This policy applies to all personal data processed by FCFK Swindon - volunteer details and cake referrals.

2.2 Laura Cain, Founder of FCFK Swindon will take responsibility for ongoing compliance with this policy.

2.3 This policy will be reviewed at least annually.

## **3. Data Protection Registration**

3.1 FCFK Swindon is exempt from the requirement to register with the Information Commissioner's Office, due to being a not-for-profit organisation. Should the nature of our activities change, and we are required to register with the ICO under the Act, Laura Cain will ensure this registration is completed.

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

4.1 We collect two types of personal information:

- (a) personal data that referrers submit via our online cake request form
- (b) personal data that individuals submit when joining us as a volunteer via our volunteer sign up form

### **4.2 Cake requests**

When a referrer requests a cake from us we collect certain personal information which enables us to provide a birthday cake with the correct name and age on it, to meet any specific dietary requirements and to deliver it to the right person.

This information is stored in a secure, password protected Google Document Sheet via the online Google Form that referrers complete. Only volunteers with admin rights (Laura Cain, Simon Cain and Helen Young) have access to this information.

Information needed to provide our service of a personalised cake is transferred to the volunteer who has signed up to make the cake via WhatsApp, which uses end-to-end encryption.

### **4.3 Volunteer details**

When people join Free Cakes for Kids Swindon as a volunteer we collect: first and last name, telephone number, email address and home address. This enables us to contact volunteers via WhatsApp and our private Facebook Group to make them aware of new cake orders and other information relevant to the group.

This information is stored in a secure, password protected Google Document Sheet via the online Google Form that volunteers complete. Only volunteers with admin rights (Laura Cain, Simon Cain and Helen Young) have access to this information.

This information isn't shared with anyone else.

### **4.4 Requests for Information**

Any service user or volunteer may request details of information which they believe we hold about them.

This can be done via email to Laura Cain at [freecakesforkidsswindon@gmail.com](mailto:freecakesforkidsswindon@gmail.com).

We will provide the requested information within 20 working days. The request may be refused where the disclosure is not in public interest or where it could lead to a breach of the Data Protection Act.

Free Cakes for Kids Swindon will undertake to provide the requested information within 20 working days. The Chair may refuse to disclose information where the disclosure is not in the public interest or where it could lead to a breach of the Data Protection Act.

## **5. Responsibilities of volunteers**

5.1 All volunteers are responsible for:

- Checking that the information they provide to FCFK Swindon is accurate.
- Informing FCFK Swindon of any changes to information, e.g. change of address.
- When, as part of their volunteering, volunteers receive or collect information about others (e.g. referred families, details of personal circumstances), they must comply with this policy, with particular in regard to storage and deletion of personal information.
- Ensuring that personal information is not disclosed in any way to any unauthorised third party. This includes sharing photographs of their cakes outside of the FCFK Swindon Volunteer Facebook Group with names visible (with names hidden is ok).

5.2 It should be noted that any unauthorised disclosure may result in a volunteer being unable to continue to bake for FCFK Swindon.

## **6. Responsibilities of referring organisations**

6.1 Organisations that refer families for a cake from Free Cakes for Kids Swindon are responsible for:

- Checking that all information provided to FCFK Swindon is accurate and up to date
- Ensuring they have consent of an adult responsible for the child they are referring to us
- Informing FCFK Swindon of any changes to information, e.g. change of delivery address or date
- Informing FCFK Swindon of any errors or changes, e.g. incorrect spelling of name, incorrect age. FCFK Swindon cannot be held responsible for any errors that aren't reported

## **7. Collection of information for specific and legitimate purposes**

7.1 Our Privacy Notice outlines the purpose of all data that we request.

## **8. Limiting information collection to just what is necessary**

8.1 Our cake request form is reviewed regularly to ensure all information requested is relevant.

## **9. Accuracy of information**

9.1 Accuracy of information provided by volunteers and referrers is covered in points 5 and 6.

## **10. Keeping information for only as long as necessary**

10.1 Specific cake request details (referrer name, contact telephone number and / or email address, child's name and age, delivery date, address and contact name / telephoned number) are kept centrally for three calendar months after the cake has been delivered. This is to ensure we have full details of the cake in case of any queries after delivery.

10.2 After this time, specific details will be deleted from Google Forms, Google Documents and the Apple iCloud calendar, and only a high-level record of each cake request will be kept.

This record is:

- (a) the referring organisation
- (b) the referrer's name
- (c) the delivery date
- (d) the name of the volunteer who made the cake
- (e) the child's first name

This is to enable us to keep track of how many cakes have been made for different organisations and by which volunteers, and to make them identifiable in case of any queries where multiple orders were made for the same delivery date.

10.3 Volunteers must delete any information they have received about a cake order as soon as it has been delivered.

10.4 Volunteer information is kept as long as volunteers are active. Once they decide to no longer be a volunteer, the records of their personal details are deleted.

## **11. Keeping information appropriately secure**

11.1 Free Cakes for Kids Swindon does not hold any personal information in a non computerised form. Any personal information that may be held in this way in the future must be kept in a locked cabinet or locked drawer.

11.2 Any information completed via our cake request form or volunteer sign up form is encrypted and stored via Google Forms and Google Documents in the Cloud. [Google's Cloud security information](#).

11.3 This information is also stored in an Apple iCloud calendar, which is built with industry-standard security technologies. [Apple's iCloud security details](#).

11.4 All of this information is password protected and only accessible by the three admin volunteers (Laura Cain, Helen Young, Simon Cain).

11.5 Information required for order fulfilment is transferred to the baker via WhatsApp, which has end-to-end encryption, meaning only the admin issuing the details and the baker receiving them can see them. [WhatsApp's security details](#).

11.6 Free Cakes for Kids Swindon does not hold or process any sensitive personal data (as defined in the General Data Protection Regulation) for volunteers, referring organisations or referred families.

## **Appendix A – Glossary of Terms**

To make it easier to understand this policy, technical terms used are listed below:

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Subjects/Service Users – The individual whose personal information is being held or processed by an agency (for example: a client, an employee, a supporter).

Processing – means collecting, amending, handling, storing or disclosing personal information

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about companies and agencies but applies to named persons or employees within an agency.

Sensitive data – means data about:

- ❖ Racial or ethnic origin
- ❖ Political opinions
- ❖ Religious or similar beliefs
- ❖ Trade union membership
- ❖ Physical or mental health
- ❖ Sexual life
- ❖ Criminal record
- ❖ Criminal proceedings relating to subject's offences

GDPR - The General Data Protection Regulation (GDPR) will apply from 25 May 2018. It operates within a common set of rules applying across the (European Union) EU.