



The Pilgrim Shelter

Data Protection Policy

1. The Pilgrim Shelter holds four types of information which are covered by this policy:
 - **Organisational information** – publicly available information about organisations and some confidential information
 - **Personal information** – information about individuals such as names, addresses, job titles
 - **Sensitive personal information** – in general this kind of information is only held about employees. There are, however, instances where sensitive information is held about other people. For example, information about dietary requirements at training sessions might allow a person's religion to be deduced
 - **CCTV** – recordings from video cameras used for security monitoring
2. Information about organisations is not covered by the General Data Protection Regulation (GDPR) 2018. However, there is sometimes ambiguity about whether certain information is personal or organisational. For instance, the contact details for a developing group may be someone's home address. Also The Pilgrim Shelter should strive for best practice as regards organisational information. For these reasons, organisational information is covered by this policy.
3. The organisations and people about which The Pilgrim Shelter holds information are referred to in this policy as data subjects.
4. Personal information
 - 4.1 The Pilgrim Shelter will not hold personal or sensitive information about individuals without their knowledge and consent.
 - 4.2 The Pilgrim Shelter will only hold information for specific purposes. It will inform data subjects what those purposes are. It will also inform them if those purposes change. The only exception to this is that The Pilgrim Shelter will make it clear to members that it is a condition of their membership that The Pilgrim Shelter will decide what should happen to information supplied about the organisation (but not about individuals within the organisation, other than post holder names)
 - 4.3 The Pilgrim Shelter will seek to maintain accurate information by creating ways in which data subjects can update the information held.
 - 4.4 Data subjects will be given the option not to receive marketing mailings from The Pilgrim Shelter or other organisations (but see 3 above)

- 4.5 The Pilgrim Shelter has procedures for ensuring the security of all personal data. Paper records containing confidential personal data are disposed of in a secure way.
5. CCTV
- 5.1 The public will always be informed through well placed notices that they are being monitored on CCTV. Signs should:
- Be clearly visible
 - Contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact about the scheme (where these things are not obvious to those being monitored)
 - Include basic contact details such as a simple website address, telephone number or email contact
- 5.2 In exceptional circumstances, where audio recording is being used, this should be stated explicitly and prominently. It should also be clearly stated if audio recording is used for a different or further purpose than visual recording.
6. Information about data subjects will not be disclosed to other organisations or to individuals who are working on behalf of The Pilgrim Shelter under contract or Trustee Board except in circumstances where this is a legal requirement such as may be set out in the Trust's policies on Safeguarding Children and/or Vulnerable Adults, or where there is an explicit or implied consent, or where the information is publicly available elsewhere.
7. Data subject will be entitled to have access to information held about them by The Pilgrim Shelter
8. Information will not be retained once it is no longer required
9. The Pilgrim Shelter has a set of procedures covering all areas of its work which it follows to ensure that it achieves the aims set out above
10. The Trust Secretary (or person acting with those responsibilities) has been designated as the Data Protection Compliance Officer for The Pilgrim Shelter
11. At the beginning of any new type of project or activity, the committee member managing it will consult the Trust Compliance Officer about any data protection implications.
12. There may be situations where The Pilgrim Shelter works in partnership with other organisations on projects which require data sharing. The Pilgrim Shelter will clarify which organisation is to be the Data Controller and will ensure that the Data Controller deals correctly with any data that The Pilgrim Shelter has collected.
13. All new volunteers and staff will be given training on the data protection policy and procedures.
14. This Data Protection Policy will be reviewed by the Trustees annually at the Annual General Meeting.