



Policy on Data Protection

FiSH Neighbourhood Care (FiSH) uses information relating to FiSH members and other users of its services, its staff and volunteers, and other individuals in the course of its activities.

FiSH complies with the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003, and other relevant applicable law.

FiSH recognises that this legislation:

- identifies information relating to identifiable individuals as personal data, in whatever format (paper, electronic file or other) it is held;
- regulates FiSH's use of that information and all processing of personal data (including collecting, storing, using, sharing and deleting it);
- requires FiSH to meet specific requirements if it processes special categories of personal data (in FiSH's case in particular information on racial or ethnic origin, and data concerning health);
- classifies FiSH as a data controller in relation to the personal data it processes;
- gives individuals rights relating to their personal data (including rights to access their data and to limit its use) which FiSH must respect; and
- authorises the Information Commissioner's Office (ICO) to issue guidance and codes of practice and to regulate compliance with the law relating to privacy and data protection.

FiSH, in complying with relevant data protection law, will:

- apply the data protection principles, ensuring that personal data is processed lawfully, fairly and transparently; collected for specified and legitimate purposes; limited to what is necessary; accurate and kept up to date; retained only for as long as necessary; and kept secure;
- ensure that all processing of personal data has an appropriate lawful basis under the UK GDPR, and that additional conditions are met where special category data is processed;

- implement appropriate technical and organisational measures to protect personal data and to ensure that processing is carried out in accordance with the UK GDPR;
- enhance awareness amongst staff and volunteers of the importance of data protection and confidentiality when handling personal information;
- ensure that personal data is shared with third parties only where it is lawful and necessary to do so;
- respond appropriately to any requests from individuals to exercise their rights under data protection law;
- report and manage any personal data breaches in accordance with legal requirements; and
- explain to members and other users of its services, staff and volunteers and other data subjects in a privacy notice how it uses personal information.

FiSH is registered on the Data Protection Register (no ZA4282720). FiSH is not required to appoint a Data Protection Officer and has decided not to do so voluntarily.

The Trustees have governance responsibility for policy on data protection and for assurance as to FiSH's compliance with applicable law and this policy.

The Director has operational responsibility to ensure, so far as reasonably practicable, and to be able to demonstrate that processing of personal data is performed in accordance with applicable law and FiSH procedures.

All trustees, staff and volunteers who handle personal data in the course of FiSH activities must treat that information as confidential and comply with FiSH data protection procedures.

This statement of policy, together with FiSH's data protection procedures and its privacy notice, form part of FiSH's technical and organisational measures to ensure and to demonstrate that processing is performed in accordance with the UK GDPR.

FiSH's data protection procedures may be updated from time to time by the Director in order to reflect operational needs, guidance from the Information Commissioner's Office, or changes in applicable law.