



Data Protection Policy

This policy lays out the data protection policy for Wonder Wards and is therefore not a data protection policy for all. Its Annexes are in place, such as our privacy policy and Appropriate Policy Document, to cover specialist areas. This policy covers the fundamental, practical application of the Data Protection Act (DPA), which is to be complied with by anyone in our organisation who manages, or has responsibility, for personal data.

Data protection principles

Data is to be:

- **Processed lawfully, fairly and in a transparent manner.**
- There are several grounds on which data may be collected, including consent.
- We are clear that our collection of data is legitimate and we have obtained consent to hold an individual's data, where appropriate.

- We are open and honest about how and why we collect data; and individuals have the right to access their data.

- **Collected for specified, explicit and legitimate purposes and not used for any other purpose.**

- We are clear on what data we will collect and the purpose for which it will be used.

- We only collect data that we need.

- When data is collected for a specific purpose, it may not be used for any other purpose, without the consent of the person whose data it is.

- **Adequate, relevant and limited to what is necessary.**

- We collect all the data we need to accomplish our objects; and

- None that we don't need.

- **Accurate and, where necessary, kept up to date.**

- We ensure that what we collect is accurate and have processes and/or checks to ensure that data which needs to be kept up-to-date is, such as beneficiary, staff or volunteer records.

- We correct any mistakes promptly.

- **Kept for no longer than is necessary.** (We understand what data we need to retain, for how long and why).

- We only hold data for as long as we need to.

- That includes both hard copy and electronic data.

- Some data must be kept for specific periods of time (eg accounting, H&SW).

- We have a process that ensures data no longer needed is destroyed.

- **Processed to ensure** appropriate security, not only to protect against

unlawful use, but also loss or damage.

- **Data is held securely**, so that it can only be accessed by those who need to do so. For example, access to online folders in shared drives is restricted to those who need it, IT systems are password protected, and/or sensitive documents that may be shared (eg payroll) are password protected.

- **Data is kept safe.** Our IT systems have adequate anti-virus and firewall protection that is kept up-to-date. Staff understand what they must and must not do to safeguard against cyber-attacks, and that passwords must be strong and not written down or shared.

- **Data is recoverable.** We have adequate data back-up and disaster recovery processes. All data is backed up to the secure server and additional HDD on a monthly basis.

Individual Rights

We recognise that individuals' rights include the right to be informed, to access, to rectification, erasure, restrict processing, data portability and to object to the use of their personal data.

Use of Imagery/Video

In some cases, stock photo's may be used by Wonder Wards for their online presence.

However, all new imagery/video used by Wonder Wards will be protected by copyright and is only used with the consent of the owner and/or from the individuals in the images.

All images & video will be used solely for promotion of the charity objects, such as:

- Recording/reporting fundraising events
- Promoting fundraising campaigns
- Promoting the charity's online presence.

In all cases, individuals will be asked to complete an image consent form. Particularly if/when Wonder Wards wishes to take original images or videos for the

purposes laid out above. When using images of children, we will ensure that these images never place the child at risk. During fundraising events, photographs and videos may be taken by Wonder Wards officials. Attendee will be forewarned on the webpage and have the right to request omission from any media.

Children

People under 13 years of age are not legally able to give consent. Consent must be obtained through a parent or guardian. Please refer to our Privacy Policy at Annex A.

Data Breach

A breach is more than just losing personal data. It is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

We will investigate the circumstances of any loss or breach, to identify if any action needs to be taken. Action might include changes in procedures, where there will help to prevent a re-occurrence; or disciplinary/other action, in the event of negligence.

We will notify the ICO within 72 hours, of a breach, if it is likely to result in a risk to the rights and freedoms of individuals. If unaddressed, such a breach is likely to have a significant detrimental effect on individuals. For example:

- Result in discrimination.

- Damage to reputation.
- Financial loss.
- Loss of confidentiality or any other significant economic or social disadvantage.

1. Special Category Data

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Special category (sensitive) data includes information about an individual's race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation. Wonder Wards will never request the majority of special category data from anyone, as it is not necessary for our purpose.

We may, however, hold data on the health condition of the children we campaign to help. Wonder Wards vows to maintain respect and the upmost discretion with this data; and only holds it with the consent of both the parent/guardian and the child/young person. An Appropriate Policy Document can be found at Annex B.

Privacy and Electronic Communications (PECR)

The PECR works side by side with the DPA if an organisation processes online communications (by phone, fax, email or text) to and from the general public.

The goal of PECR is to provide online users with an equal level of protection when using

Wonder Wards services. For example, it prevents us from collecting online data about our users without consent, and mandates that users be notified whenever their data has been exposed to a third party.

PECR provides all kinds of protections for individuals who are using our online services, including:

- How much information can be collected – We only collect data required for legitimate purposes and under the consent rule.
- Who gets access to it – only those in the organisation with the requirement to access the data will have the permissions to do so; and
- Where it can be stored (in a physical location vs. digital) – All personal data is copied across to digital storage and securely protected in accordance to the DPA.

DPA Responsibilities

The Board of Trustees. Ultimately the charity trustees are responsible for data protection. The chair is currently responsible for data protection, including periodic review of the policy and any breaches.

Executive. There is currently no Data Protection Officer

Specialists. There are currently no nominated individuals with responsibility for areas, where particular data protection expertise is required. For example, IT or fundraising.

Version Control - Approval and Review

Version	Approved By	Approval	Main Changes	Review Period
No		Date		
1.0	Board	March 23	Initial draft approved	Annually

1.

Annex A

Wonder Wards Privacy Policy

Privacy Policy Scope

This Privacy Policy identifies and describes the way we ("Wonder Wards") use and protect the information we collect about employees, volunteers, sponsors and beneficiaries.

When you work for, or donate to Wonder Wards, we may ask you to provide some details such as your name, age, home address and email address. We keep these details so that we can contact you about events, fundraising and updates.

Wonder Wards agrees to store and process all personal information it collects from you in accordance with the latest Data Protection legislation. We are entering a period in which new legislation is taking effect and there will be new legislation in the future. For now we have made adjustments to comply with the new General Data Protection Regulation (GDPR), and we are monitoring the new Data Protection Bill.

Our Privacy Promise

We promise:

- To keep your data safe and private.

- Not to sell your data.
- To only use your data for its intended purpose.
- To allow you to know what data we hold, on request.
- To erase all of your data upon request.

What we collect, how we collect it, and how we use it

All data is collected with consent and for legitimate purposes. The following are the reason how, why and what?

Staff

The data held on employees will be:

- Contact Information, that allows us to communicate with our staff, including name, address, phone number and e-mail address;
- Banking details, that allows Wonder Wards to pay their employees.;

- Imagery/video – On occasion, employees may be included within imagery taken for legitimate charity/fundraising purposes. But will always have the rights to request omission.

Volunteers

- Contact Information, that allows us to communicate with our volunteers, including name, address, phone number and e-mail address;

- Imagery/video – On occasion, volunteers may be included within imagery taken for legitimate charity/fundraising purposes. But will always have the rights to request omission.

Beneficiaries

- Contact Information, that allows us to communicate with our beneficiaries, including name, address, phone number and e-mail address;

- Imagery/video – On rare occasion, beneficiaries may be asked to partake in imagery/video taken for legitimate charity/fundraising/donor update purposes. But a consent form will always be required, in order to protect the beneficiary, whom will also always have the rights to request omission/deletion.

Donors

- Contact Information, such as name, address, phone number and e-mail addresses, that allows us to communicate with our donors, apply for gift aid, and update donors on upcoming events or campaign results;

- Imagery/video – On occasion, donors may be included within imagery/video taken at fundraising events, for legitimate charity/fundraising purposes. But will always have the rights to request omission.

- Online activity tracking (see below) – Those that donate online/electronically, will have their data stored on our Customer Relationship Management system. This allows Wonder Wards to:

- Analyse online usage, in order to generate more funds for our causes;

- Communicate with those donating online in order to thank them; and

- Update donors as to the fantastic results Wonder Wards has been able to achieve thanks to their generosity.

General

We collect information when you give it to us at events, when you register online for an event, donate on our websites, or visit our social media pages. We may use the information we collect in a variety of ways, including:

- Providing you with the best user experience possible;
- Providing the services you use, and to respond to your questions;

- Communicating with you regarding updates and upcoming events;
- Delivering customized content that may be of interest to you;
- Investigating, preventing or taking action regarding illegal activities, violations of our online Terms of Service, or Acceptable Use Policies.

Online Activity Tracking

We collect information about your activity on the Wonder Wards website and social media platforms, for a number of purposes. We use that information to help tailor the content you see on it and to customize the promotion of upcoming events.

Wonder Wards may collect information about your computer, or mobile device, such as your IP address, operating system and browser type, for administrative purposes and to report aggregated anonymous information to our IT team and partners. This is statistical data about the browsing actions and patterns of users, used to improve our service to you. But it will not identify you personally and does not identify any personal details whatsoever.

Information Sharing

With Wonder Wards Website Administrators: Subject to applicable legal restrictions, your online data will be shared with our website administrators. This enables them to:

- Amend web pages in line with what you're interested in;
- Inform us of whom may require contacting;
- Ensuring your experience is as seamless as possible.
- Maintaining and running the system;
- Providing technical support.

Extraordinary Circumstances: We may also be required to provide Personal Information to non-Wonder Wards companies, or other third parties, ONLY for purposes such as:

- Complying with court orders and other legal processes;
- To assist with identity verification, and to prevent fraud and identity theft;
- Enforcing our agreements and property rights.

Safeguarding Your Information

Our Policy on Data Protection and Security

- We **do not share** your Personal Information with anyone for any purpose without your explicit permission. Unless in the extraordinary circumstances identified above.

- We maintain information about you in our records while you are a user, or until 6 months after it is no longer needed for charity, tax, or legal purposes.

- We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by Wonder Wards.

- We require non-Wonder Wards companies/administrators, acting on our behalf, to protect any Personal Information they may receive in a manner consistent with this Policy. We do not allow them to use such information for any purpose other than the original stated purpose for the data.

- The data that we collect from you shall not be transferred to or stored at, a destination outside the European Economic Area ("EEA"). All information you provide to Wonder Wards is stored on secure servers.

- Once Wonder Wards receives your information, it will take operational and technical steps and use security procedures to safeguard and secure it and to try to prevent unauthorised access.

Links to/from Other Web Sites

Wonder Wards is not responsible for the practices employed by websites linked to or from our

website, nor the information or content contained therein. Please remember that when you use a link to go from our website to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before processing your personal information with them.

Changes to Our Privacy Policy

If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are posted on this page.

Complaints and Challenges

Those whose data Wonder Wards holds, have the rights to complain about our processes and/or challenge the accuracy of the data we hold. Wonder Wards by no means wants to hold inaccurate information and therefore encourages challenges.

In the case of a complaint, Wonder Wards will electronically log the complaint and immediately investigate the allegation. If an investigation finds a complaint valid, actions will be taken to rectify the matter. If it breaches the DPA, we will notify the ICO within 72 hours, if it is likely to result in a risk to the rights and freedoms of individuals.

In the case of a challenge, the challenge will be electronically recorded and the data will be updated in line with the individuals request.

Access to Information & Customer Support

The DPA/GDPR gives you the right to access the information that Wonder Wards holds about you. If you want us to send you details that we hold about you, please email us at wonderwards@outlook.com, or write to Wonder Wards, 27 Swaledale Road, Warminster, BA12 8FH.

If you have any other questions or concerns about the Charity, please email us at wonderwards@outlook.com or write to us at the above address.

Wonder Wards is registered in England and Wales No: #####. Registered address: 27 Swaledale Road, Warminster, BA12 8FH.

Last Updated: ## ##### 2023

Annex B

Appropriate Policy Document

The Data Protection Act 2018 (DPA 2018) outlines the requirement for an Appropriate Policy Document (APD) to be in place when processing special category (SC) data under certain specified conditions. This document demonstrates that the processing of SC data is compliant with the requirements of the General Data Protection Regulation (GDPR) Article 5 principles. In particular, it outlines the retention policies with respect to this data.

This APD complements the general record of processing under Article 30 of the GDPR and provides SC data with further protection and accountability. It is kept under review and will be retained until six months after the date Wonder Wards stops the relevant processing. It will always be available to the Commissioner if required.



Wonder Wards may be required to process the health condition of children and young people suffering with life limiting conditions. In order to:

- Best fulfil our objects and improve their quality of life;

- Raise funds for campaigns directly associated with an individual case; and

Update donors on campaigns and the child that they have raised funds/awareness for.



See DPA 18, Schedule 1, Part 1, Paragraph 2(2)(d)

Accountability principle

I. Do we maintain appropriate documentation of our processing activities?

Yes – Wonder Wards Data Protection Policy

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Do we have appropriate data protection policies?

Yes - Data Protection Policy

I. Do we carry out data protection impact assessments (DPIA) for uses of personal data that are likely to result in high risk to individuals' interests?

No – The processing of personal data by Wonder Wards is highly unlikely to result in high risk to individuals' interests. However, a data protection risk assessment can be found [here](#).

Principle (a): lawfulness, fairness and transparency

I. Have we identified an appropriate lawful basis for processing and a further Schedule 1 condition for

Yes, Wonderwards processes its SC data in line with the DPA 18 and GDPR

I. Do we make appropriate privacy information available with respect to the SC data?

Wonder Wards makes available ALL personal data on request by the owner of the information, and/or the parent/guardian (See Annex A – Access to Information & Customer Support.

I. Are we open and honest when we collect the SC data and do we ensure we do not deceive or mislead people?

Yes. Wonder Wards follows its Data Protection Policy and Fundraising Policy in line with the Data Protection Regulator respectively.

Principle (b): purpose limitation

I. Have we clearly identified our purpose(s) for processing the SC data?

Yes, Wonder Wards Data Protection Policy and first box of this annex.

Have we included appropriate details of these purposes in our privacy information for individuals?

Yes, all appropriate details can be found in the Wonder Wards Data Protection Policy.

I. If we plan to use personal data for a new purpose (other than a legal obligation or function set out in law), do we check that this is compatible with our original purpose or get specific consent for the new purpose?

Yes, and change or addition to the purposes would require a proposal and vote to/ from the Wonder Wards Trustees and also made clear to the owner for their approval/ decline.

Principle (c): data minimisation

I. Are we satisfied that we only collect SC personal data we actually need for our specified purposes?

Yes, minimal SC is collected; and only when absolutely necessary to fulfil

the purposes of the charity set out in its Governing Document.

I. Are we satisfied that we have sufficient SC data to properly fulfil those purposes?

As above, only SC data relevant to the purposes set out in the charity constitution is collected and processed.

I. Do we periodically review this particular SC data, and delete anything we don't need?

Yes, all data held is reviewed 6 monthly in order to ensure Wonder Wards is not processing SC data that

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As above, only SC data relevant to the purposes set out in the charity constitution is collected and processed.

I. Do we periodically review this particular SC data, and delete anything we don't need?

Yes, all data held is reviewed 6 monthly in order to ensure Wonder Wards is not processing SC data that

I. Do we have appropriate processes in place to check the accuracy of the SC data we collect, and do

**Yes, Wonder Wards keep in close contact with its beneficiaries and their parents/guardians.
In order to ensure the SC data is correct, up to date, and deleted when no longer required.**

I. Do we have a process in place to identify when we need to keep the SC data updated to properly fu

**Yes, as above. Wonder Wards keeps in close contacts with parents/guardians during any
given SC campaign. We have a 6 month policy after the end of a campaign to delete any SC
data. Or when requested by the owner of the SC data or parent/guardian.**

I.

Do we have a policy or set of procedures which outline how we keep records of mistakes and opinions, how we deal with challenges to the accuracy of data and how we ensure compliance with the individual's right to rectification?

Yes, please see our Data Protection Policy – Data Breach section, and Annex A – Complaints and Challenges.

I. Do we carefully consider how long we keep the SC data and can we justify this amount of time?

Personal Data, including SC, is kept for 6 months after the date it was last used or until its owner or parent/guardian requests its removal. This is in line with the DPA 18 and GDPR.

I. Do we regularly review our SC data and erase it, or make it anonymous when we no longer need it?

Data held by Wonder Wards is reviewed 6 monthly in order to ensure we hold no data that has passed the 6 month holding time specified in this policy.

I. Have we clearly identified any SC data that we need to keep for public interest archiving, scientific or statistical purposes?

Yes, the only SC data Wonder Wards would be required to archive/use for longer term/permanent basis, would be minimal and strictly permitted by the owner and/or parent/guardian.

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Have we analysed the risks presented by our processing and used this to assess the appropriate level of security we need for this data?

Yes, see DPIA at Annex C

I. Do we have an information security policy (or equivalent) regarding this SC data and do we take steps to ensure it is followed?

No (WW InfoSec Policy in production)

I. Have we put other technical measures or controls in place because of the circumstances and the type of SC data we are processing?

The SC data held by Wonder Wards is minimal and the controls laid out in our Data Protection Policy are sufficient to protect the data.





Wonder Wards only holds SC data on the specific health condition limiting the life of the children and young people we aim to help. Nothing more than the condition itself is kept and it is kept for no longer than absolutely necessary to carry out our purposes. As laid out in this document, data will be deleted either, 6 months after it was last used, or when requested by its owner and/or parent/guardian. With the exception of fundraising creative memorabilia. But this will only be authorized via the permission of the owner and/or parent/guardian.

***Creative Memorabilia is a piece of creative art produced by the owner of the SC data, which will be auctioned off to raise money for the charity purposes.**



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March 2024
