

Imara-Uganda Education Fund
Registered Charity 1142239 (England and Wales)
Risk Management – GDPR Policy

1. The Law and the Charity, Imara-Uganda Education Fund

We can collect and process personal data if:

- We have the consent of the individual
- It is in the interests of the Data Controller – Secretary and/or a nominated Member of the Management Team.
- It is necessary for the contract with the individual – example: for returns to the Charity Commission, circulation of Newsletters, Gift Aid, Education Programmes, Financial Controls.
- It is not necessary to register with the Information Commissioner’s Office (ICO).

2. Personal Data

We undertake never to share Personal Data with any other organisation.

Definition. “Any information relating to an identified or identifiable natural person (referred to as the Data Subject”. For our organisation this will be the information we gather on membership application forms, declarations such as Gift Aid information, Training Records and mandates for donations made by bank Standing Orders.

In this document all individuals who work with our charity will be called volunteers.

We will hold the Personal Data for our Uganda scholars and volunteers to the same standard of UK volunteers.

Personal Data will be securely held as follows:

- Membership Application Forms – Hon. Secretary
- Gift Aid Declarations – Hon Chairman
- Bank details including Standing Order details – Hon Treasurer.
- Uganda financial transactions – Hon Treasurer
- Scholarship Children/families – Hon Chairman
- Training Records – Hon Secretary

For the purposes GDPR, Trustees and Officers will be called volunteers.

Action.

1. Any holdings of Personal Data by others than those stated to be destroyed by shredding or other secure means. Automated notifications such as Group Emails must be personal data non-specific.
2. GDPR Consent Forms have been sent to all who have previously provided Personal Data.
3. A signed and dated Consent Form will be required of all future applicants to be a volunteer.

3. Processing Personal Data is defined as: “Any operation or set of operations which is performed on personal data whether or not by automated means”. This includes manuscript or computer “Processing”.

Introducing GDPR requires we know:

- What personal data we hold?
- Do we really need it? All unwanted to be securely disposed of.
- Where it came from and the basis on which it was collected?
- What do we do with it and what we plan to do with it?
- Where and how do we store it?

This information must be documented.

4. Consent. We must create and maintain a standard wording for all appropriate documents such as a signed Consent Form for all new volunteers. Under GDPR, consent must be:

Unbundled - separate from general terms and conditions


Active opt-in - no pre-ticked boxes

Named - clear who has given consent.

Easy to unsubscribe – Simply write to the Registered Office of our charity stating your wish to have your personal data removed from our data base. Please note that all processing of your personal data will cease once you have withdrawn consent, other than where this is required by law. It will not affect any personal

data that has already been processed prior to this point. Cancellation may take a few days. Our Policy is as soon as possible and within 14 days.

5. General. Our Charity Policy is that GDPR is an evolution, not revolution. We aim to comply fully with the Regulations. We have taken it as the opportunity to review previously set standards (Data Protection Act) and upgrade in compliance with new requirements. This Policy will be reviewed within one year (prior to 25th May 2019) and thereafter every three years.

6. Registered Office. Imara-Uganda Education Fund
Registered Charity 1142239 (England and Wales)
Registered Office: The Dower House, Durrington Hill,
Worthing, BN13 2PX
 - 01903 369523 Email normanhorsley@btinternet.com

7. Complaints. If you think your data has been misused or that our organisation hasn't kept it secure, we hope you will first contact us and tell us what you feel. We undertake to deal with a complaint within the timescale: 1. To acknowledge as soon as possible and within 14 days and 2. provide a written response as soon as possible and within 28 days.

If you're unhappy with our response or if you need any advice you could contact the Information Commissioner's Office ICO - Helpline - Telephone: 0303 123 1113.