



# Data Protection Policy

## The Policy

Under the terms of the General Data Protection Regulations (2016), the Field Studies Council (to be known as FSC within this policy) has designed and implemented this Data Protection Policy to establish good data protection practices in view of its responsibilities as data processor and data controller, and to ensure FSC protects the personal data and privacy of the individuals with whom it interacts.

Those individuals include members and supporters, course attendees, students and their parents and guardians, recipients of FSC scholarships, school contacts, customers, donors (existing and potential), legators, employees (past, present and prospective), our associate tutors, volunteers, trustees, suppliers, consultants and contractors.

FSC is registered as a data controller under the General Data Protection Regulations (2016) - registration no. Z5445662. FSC collects and processes individual's personal information in order to carry out the work of the charity and its responsibilities as an employer and as a supplier of products and services. The nature of this information is sometimes sensitive, for example when it may include medical or ethnicity details; so in its duty of care, FSC has in place data-processing and data privacy procedures and a rolling programme of data-protection training to ensure staff that handle personal and sensitive data, do so in a manner that is compliant with the General Data Protection Regulations.

This policy exists to ensure sufficient emphasis is placed on data protection, so that any processing of personal data carried out by FSC and any necessary third-party data-processors complies with FSC's data protection obligations as data controller as set out in Article 5(2) of GDPR, that states;

"the controller shall be responsible for, and be able to demonstrate, compliance with the principles."

This policy draws attention to the General Data Protection Regulations (2016) and the key principles which state that personal data must be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest,

and in particular:

- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."



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In complying with the terms of this policy, FSC will therefore:

- only use the personal data provided/obtained for purposes as stated in the FSC data-processing statement
- take appropriate and reasonable steps to ensure the integrity of FSC employees with access to personal data
- continue to train those members of FSC staff who carry out processing of personal data, to ensure awareness of the requirements of the GDPR (2016), and provide the necessary data protection training/guidance as appropriate to their role to ensure compliance.
- take reasonable steps to ensure the security of the personal data, protecting it against unauthorised processing, accidental loss, damage or destruction.
- report to the ICO within 72 hours of any security breaches that require ICO notification
- handle 'Subject Access Requests' from data subject within 30 days in accordance with the General Data Protection regulations and under our obligations to provide the "Right to Access".
- only maintain/store personal data for the retention periods as stated in our data-processing log. Beyond this time frame personal data will be securely removed/erased.
- provide full cooperation in relation to any data-processing complaint from data subjects, and if applicable, remove personal data upon request in accordance with our obligations to provide the "Right to be forgotten".
- not disclose personal data to third-parties unless we are required to so by law, or where doing so is a necessary part of providing a service or fulfilling customer/employee expectation, for example; banking services, mailing/courier services, use of freelance tutors, disclosures to HMRC and pensions providers. FSC will not pass on personal data to other organisations where there is not a necessity/requirement to do so.

FSC fully endorses and adheres to the principles of the General Data Protection Regulations (GDPR). We have implemented and continue to review/develop data protection policies and procedures to help ensure that we manage and process personal information lawfully and correctly. We are committed to ensuring that our employees who manage and handle personal information are appropriately trained to do so and that data handling processes and procedures are regularly reviewed and audited for compliance.

All FSC employees who handle personal data are responsible for complying with the GDPR. All managers are responsible for supervising their staff and overseeing compliance. We also have a Data Protection Officer who is responsible for providing advice on best practice.

FSC regards the lawful and compliant handling of personal information as important to successful operations and to maintaining the confidence of those with whom we interact, and FSC fully embraces the aims of the GDPR. As part of the charity's work in complying with the GDPR, FSC has conducted an audit of its data-processing activities and produced associated "good-housekeeping" records in the form of a data-processing log, and data-processing/data-privacy statements.

Please contact FSC's Data Protection Officer at FSC Head Office ([dataprotection@field-studies-council.org](mailto:dataprotection@field-studies-council.org)), if you have any questions or comments in respect of this data protection policy.

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