



# Data Protection Policy

## The Policy

Under the terms of the General Data Protection Regulations (2016) and the Data Protection Act (2018), 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, enquirers, 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 Data Protection Act (2018) - registration no. Z5445662. FSC collects and processes an individual's personal information to fulfil 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 privacy procedures and data-protection training to ensure staff that handle personal and sensitive data, do so in a manner that is compliant with Data Protection law.

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 101 of GDPR. This states that;

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

This policy draws attention to the Data Protection Act (2018) Chapter 2 (sections 34-40) and its six key data protection principles. These are:

1. Processing of personal data must be lawful and fair
2. The purpose for which personal data is collected on any occasion must be specified, explicit, and legitimate.
3. Personal data must be adequate, relevant, and not excessive.
4. Personal data be accurate and kept up to date.
5. Personal data must be kept for no longer than necessary.
6. Personal data must be processed in a secure manner.

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 and privacy statement (including its list of non-exclusive data-processing examples) and its associated data-processing log.
- take appropriate and reasonable steps to ensure the integrity of FSC employees with access to personal data.
- continue to train FSC staff where responsibilities include the processing of personal data, and to ensure awareness of the requirements of the GDPR (2016) and the Data Protection Act (2018), and to 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.



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- report to the ICO within 72 hours of any security breaches that require ICO notification
- handle 'Subject Access Requests' from data subjects within 30 days in accordance with current 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 anonymised/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 non-contracted 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 GDPR (2016) and the Data Protection Act (2018). We have implemented and continue to review/amend 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 Data Protection regulations. 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 a vital component of successful operations and to maintaining the confidence of those with whom we interact. FSC fully embraces the aims of the GDPR(2016) and the DPA (2018). As part of the charity's work in data compliance, FSC regularly audits its data-processing activities and updates its associated records to both manage and demonstrate its commitment to good data housekeeping.

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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