



**CUMBRIA**  
COMMUNITY FOUNDATION

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## Data Protection Policy

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## Data Protection Policy

### **1. Introduction**

- 1.1 It is the policy of Cumbria Community Foundation (CCF) to take all necessary steps to ensure that personal data held by CCF about its employees, grant applicants, fund holders, suppliers and all other individuals is processed fairly and lawfully. CCF will take all necessary steps to implement this policy.

### **2. Statutory requirements**

- 2.1 It is the policy of CCF to ensure that all relevant statutory requirements are complied with and that CCF's internal procedures are monitored periodically to ensure compliance.

### **3. Data protection principles**

- 3.1 CCF will implement and comply with the seven Data Protection Principles contained in the UK General Data Protections Regulations (UKGDPR) which promote good conduct in relation to processing personal information. These Principles are:
- (i) Personal data shall be processed fairly, lawfully and in a transparent manner ('lawfulness, fairness and transparency')
  - (ii) Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes. (Purpose limitation)
  - (iii) Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed. ('data minimisation')
  - (iv) Personal data shall be accurate and, where necessary, kept up to date. (accuracy)
  - (v) Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. (storage limitation')
  - (vi) Personal data shall be processed in a manner that ensures appropriate security, including protection against unlawful processing and against damage or loss ('integrity and confidentiality')
  - (vii) Take responsibility for what you do with personal data and how you comply with the other principles ('accountability')

### **4. Rules and procedures**

- 4.1 The attention of all employees is drawn to the data protection rules and procedures laid down by CCF from time to time. Employees have a duty to follow these rules and procedures and to co-operate with CCF to ensure this policy is effective. Disciplinary action may be taken against any employee who fails to comply with these rules and procedures. Employees should also be aware that if they knowingly or recklessly obtain or disclose personal data without CCF's consent, they may be committing a criminal offence.

## **5. Responsibilities**

- 5.1 CCF has a responsibility to ensure that personal data dealt with in the course of CCF's business is handled in accordance with statutory requirements and reasonable steps will be taken by all concerned to ensure this duty is observed.
- 5.2 CCF will consult with its employees periodically to ascertain what measures should be taken to increase awareness of data protection issues and to ensure that all necessary measures are taken to make this policy effective.
- 5.3 CCF will take such measures as may be necessary to ensure the proper training, supervision and instruction of all relevant employees in matters pertaining to data protection and to provide any necessary information.
- 5.4 As well as putting in place required contracts with third party processors of CCF's data, CCF will monitor on an ongoing basis the compliance of those processors with the provisions of the Act.
- 5.5 The person having overall responsibility for data protection will be the Finance Director.
- 5.6 Each manager or supervisor will have immediate responsibility for data protection matters in his/her own area of work.
- 5.7 The Senior Management Team will continually review data security arrangements, monitor the risk of exposure to major threats to data security, review and monitor security incidents, and establish and implement initiatives to enhance data security.
- 5.8 CCF may from time to time amend this policy statement to reflect changes in any applicable legislation.