



**New Hope Global**  
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## **Data Protection Policy**

Last Reviewed: 19/07/2021

# Data Protection Policy

This is the policy statement of New Hope Global.

Last updated	19/07/2021
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New Hope Global needs to collect and use certain types of information about the Data Subjects who come into contact with it in order to carry on our work. This personal information must be collected and dealt with appropriately—whether on paper, recorded digitally or on other material. As well as maintaining that there are safeguards to ensure this under the General Data Protection Regulation May 2018.

## Definitions

<b>Charity</b>	New Hope Global, a registered charity.
<b>GDPR</b>	General Data Protection Regulation.
<b>Responsible Person</b>	Maruf Ahmed, PhD
<b>Register of Systems</b>	A register of all systems or contexts in which personal data is processed by the Charity.
<b>Data Subject/ Service User</b>	The individual whose personal information is being held or processed by New Hope Global (for example: a client, an employee, a supporter).
<b>'Explicit' consent</b>	Consent freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.
<b>Notification</b>	Notifying the Information Commissioner about the data processing activities of New Hope Global as certain activities may be exempt from notification.
<b>Information Commissioner</b>	The UK Information Commissioner ( <a href="https://ico.org.uk/">https://ico.org.uk/</a> ) responsible for implementing and overseeing the General Data Protection Regulation.

<b>Processing</b>	Collecting, amending, handling, storing or disclosing personal information.
<b>Personal Information</b>	Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies only applying to named persons, such as individual volunteers or employees within New Hope Global.

## 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall 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 personal data that are inaccurate, having regard to the purposes for which they are processed, are 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, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

## **2. General provisions**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

## **3. Data Controller**

New Hope Global is the Data Controller under the Act, which means that it determines what purposes personal information held will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

## **4. Disclosure**

New Hope Global may share data with other agencies such as the local authority, funding bodies and other voluntary agencies.

The Data Subject will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows New Hope Global to disclose data (including sensitive data) without the data subject's consent.

These are:

1. Carrying out a legal duty or as authorised by the Secretary of State
2. Protecting vital interests of a Data Subject or other person
3. The Data Subject has already made the information public
4. Conducting any legal proceedings, obtaining legal advice or defending any legal rights
5. Monitoring for equal opportunities purposes – i.e. race, disability or religion
6. Providing a confidential service where the Data Subject's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Data Subjects to provide consent signatures.

New Hope Global regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the

confidence of those with whom we deal.

New Hope Global intends to ensure that personal information is treated lawfully and correctly.

To this end, New Hope Global will adhere to the Principles of Data Protection, as detailed in the GDPR.

Specifically, the Principles require that personal information:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

New Hope Global will, through appropriate management, monitor strict application of criteria and controls:

- Observe fully the conditions regarding the fair collection and use of information,
- Meet its legal obligations to specify the purposes for which information is used,
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements,
- Ensure the quality of information used,
- Ensure that the rights of individual's information is held, and can be fully exercised under the Act. These include:

- The right to be informed that processing is being undertaken,
  - The right of access to one's personal information
  - The right to prevent processing in certain circumstances,
  - The right to correct, rectify, block or erase information which is regarded as wrong information.
- Take appropriate technical and organisational security measures to safeguard personal information,
  - Ensure that personal information is not transferred abroad without suitable safeguards,
  - Treat people justly and fairly regardless of their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,
  - Set out clear procedures for responding to requests for information.

## 5. Data collection

### ***Informed consent***

Informed consent is when:

- A Data Subject clearly understands
- why their information is needed,
- who it will be shared with,
- the possible consequences of them agreeing or refusing the proposed use of the data,
- and then gives their consent.

New Hope Global will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, New Hope Global will ensure that the Data Subject:

- Clearly understands why the information is needed,
- Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing,
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed,
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress,
- Has received sufficient information on why their data is needed and how

it will be used.

## **6. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## **7. Lawful purposes**

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

## **8. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **9. Accuracy**

- a. The Charity shall take reasonable steps to ensure that personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. All Data Subjects have the right to access the information that New Hope Global holds about them. New Hope Global will also take reasonable steps ensure that this information is kept up to date by asking data

subjects whether information held is accurate.

In addition, New Hope Global will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection,
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice,
- Everyone processing personal information is appropriately trained to do so,
- Everyone processing personal information is appropriately supervised,
- Anyone wanting to make enquiries about handling personal information knows what to do,
- Will deal promptly and courteously with any enquiries about handling personal information,
- It describes clearly how it handles personal information,
- It will regularly review and audit the ways it holds, manages and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

## **10. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually and deleted accordingly.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why, and deleted accordingly.

## **11. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software which is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.



- c. When personal data is deleted, it will be done safely so that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 11. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the General Data Protection Regulation May 2018.

In case of any queries or questions in relation to this policy please contact New Hope Global Data Protection Officer:

Signed: \_\_\_\_\_

Full Name: Mohammed Foiz Uddin MBE MInstF

Position: Chairman

Date: 19/07/2021

Review Date: 19/07/2023

Signed: \_\_\_\_\_

Full Name: Maruf Ahmed

Position: Project Coordinator

Date: 19/07/2021

Review Date: 19/07/2023