



DATA PROTECTION AND INFORMATION GOVERNANCE POLICY

Registered Charity No: 1212284

Organisation type: Charitable Incorporated Organisation (CIO)

Approved by the Trustees: 03/09/2026

Policy owner: Board of Trustees

Data Protection Lead: Malcolm Hamilton

Next review: 01/09/27

1. Purpose

The Okehampton Foodbank needs to collect and use personal information in order to provide food bank services, manage referrals, communicate with beneficiaries, manage volunteers and staff, meet safeguarding responsibilities, administer the charity and comply with its legal obligations.

The purpose of this policy is to ensure that personal information is collected, used, stored, shared and disposed of lawfully, fairly, securely and transparently.

This policy applies to trustees, employees, volunteers and anyone processing personal information on behalf of The Okehampton Foodbank.

The charity will comply with:

the UK General Data Protection Regulation (UK GDPR);

the Data Protection Act 2018;

the Privacy and Electronic Communications Regulations 2003 (PECR), where applicable; and
other relevant UK legislation and regulatory guidance.

2. Data Controller

For the personal information covered by this policy, the data controller is:

THE OKEHAMPTON FOODBANK
Registered Charity No. 1212284
The Ockment Centre
31 North Street
Okehampton
EX20 1AR

Telephone: 07585 300537

Email: contact@okehamptonfoodbank.co.uk

The Board of Trustees has overall responsibility for ensuring that the charity complies with data protection law.

The Trustees may appoint a Data Protection Lead to oversee day-to-day compliance.

The charity will periodically assess and record whether it is legally required to appoint a statutory Data Protection Officer (DPO). The title “Data Protection Officer” will only be used where the statutory requirements of that role are applicable or the Trustees have formally chosen to appoint a DPO on that basis.

3. Data Protection Principles

The Okehampton Foodbank will ensure that personal information is:

Lawful, fair and transparent

We will have a valid lawful basis for processing personal information and will explain clearly to individuals how their information is used.

Collected for specified purposes

Personal information will only be collected for specified, explicit and legitimate purposes and will not normally be used for an incompatible purpose.

Adequate, relevant and limited

We will only collect the information reasonably necessary for the purpose for which it is required.

Accurate

Reasonable steps will be taken to ensure personal information is accurate and, where necessary, kept up to date.

Kept only as long as necessary

Personal information will not be retained for longer than is reasonably necessary for the purpose for which it was collected, unless there is a legal or regulatory reason to retain it for longer.

Secure

Appropriate technical and organisational measures will be used to protect information against unauthorised or unlawful use, accidental loss, destruction, alteration or disclosure.

Accountable

The charity will maintain appropriate records and procedures to demonstrate compliance with data protection law.

4. Personal Information We May Process

Depending upon the individual's relationship with the charity, information may include:

- name;

- address;
- telephone number;
- email address;
- household size;
- number of adults and children within a household;
- information supplied by a referral agency;
- dates on which food bank support is provided;
- relevant contact and communication records;
- dietary requirements;
- allergy information;
- information about pets where relevant to the support being provided;
- volunteer and staff information;
- emergency contact or next-of-kin information;
- safeguarding information;
- financial or administrative information where necessary; and
- other information reasonably required for the charity's legitimate activities.

The charity will avoid collecting information simply because it may be useful at some future date.

Where statistical information is required for monitoring demand, reporting to trustees, funders or evaluating the service, information should be anonymised or aggregated wherever practicable.

5. Children's Information

The Foodbank supports families and may therefore receive information relating to children.

Only the minimum information necessary will be collected.

Where the Foodbank only needs to know the number or age range of children within a household, it will not collect children's names or other identifying information unnecessarily.

Information concerning children will receive particular protection and will only be accessed by people who need it for their role.

6. Special Category Personal Information

Some information may constitute special category personal data under UK GDPR and requires additional protection.

For the Foodbank this may include, for example:

- health information;
- food allergy information where it reveals a health condition;
- disability information;
- religious information revealed through particular dietary requirements; or
- other particularly sensitive information.
- Before processing special category information, the Foodbank must identify and document:
 - an appropriate lawful basis under UK GDPR; and
 - an appropriate special category condition.

Where explicit consent is relied upon, that consent must be freely given, specific, informed and capable of being withdrawn.

Where another legal condition applies, such as safeguarding, legal claims or another condition under the Data Protection Act 2018, the charity will document that condition.

The charity will not collect special category information unless there is a genuine and proportionate need for it.

7. Lawful Bases for Processing

Consent is not required for every use of personal information.

Before processing personal information, The Okehampton Foodbank will identify and document an appropriate lawful basis.

Depending upon the circumstances this may include:

- legitimate interests, where processing is necessary for the proper administration and delivery of the charity's activities and those interests are not overridden by an individual's rights and freedoms;
- legal obligation, where information must be processed to comply with the law;
- contract, where processing is necessary in connection with a contract;
- vital interests, where processing is necessary to protect someone's life;
- consent, where an individual has a genuine choice about the processing; or
- another lawful basis available under UK data protection legislation where appropriate.

Where legitimate interests are relied upon, the charity will assess and document those interests where appropriate.

Receiving food bank support will not be made conditional upon giving consent to unrelated or optional uses of personal information.

8. Food Bank Beneficiary Information

Information concerning people receiving Foodbank support will only be collected where it is reasonably necessary to:

- administer a referral;
- establish and manage food bank support;
- ensure that appropriate food or other assistance is supplied;
- communicate about the person's support;
- protect beneficiaries, volunteers and staff;
- prevent or investigate serious misuse of the service where appropriate;
- maintain necessary administrative records; or
- meet legal, safeguarding or regulatory requirements.

Information will not be used for unrelated purposes without an appropriate lawful basis.

9. Information Received From Referral Agencies

The Foodbank may receive personal information from authorised referral organisations such as advice agencies and other partner organisations.

Referral organisations remain responsible for ensuring they have a lawful basis for collecting and transferring information to the Foodbank.

On receiving information, the Foodbank becomes responsible for ensuring that its own subsequent processing is lawful.

Individuals will be provided with appropriate privacy information explaining how the Foodbank uses their information.

Where practicable this information will be provided at the first contact with the Foodbank.

10. Privacy Information

Individuals must be given clear information about how their personal information is used.

The Foodbank will maintain a Privacy Notice which explains, as applicable:

- the identity and contact details of the charity;
- what personal information is collected;
- why it is collected;
- the lawful bases relied upon;
- where information is obtained from;
- who information may be shared with;
- how long information is normally retained;
- relevant international transfers, where applicable;
- the individual's data protection rights;
- how consent can be withdrawn where consent is relied upon;
- how to complain; and
- the right to complain to the Information Commissioner's Office.

Privacy information will be concise, understandable and easily accessible.

The charity may use a layered approach, for example providing a short privacy statement or QR code on a beneficiary card with access to the full Privacy Notice online or in paper form.

11. Consent

Where consent is the appropriate lawful basis, it must:

- be freely given;
- be specific;
- be informed;
- involve a positive opt-in;
- be separate from unnecessary terms or conditions;
- clearly identify what the person is agreeing to;
- be recorded so the charity can demonstrate when and how consent was obtained; and
- be as easy to withdraw as it was to give.
- Pre-ticked boxes, silence or inactivity will not be treated as consent.

Consent will not be requested where the charity actually intends to process the information regardless of whether the individual agrees.

12. Communication and Optional Updates

Operational messages necessary to administer someone's Foodbank support are different from promotional or fundraising communications.

Where the Foodbank asks beneficiaries whether they would like to receive optional newsletters, fundraising messages or other promotional information, this choice must be separate from receiving Foodbank assistance.

Where consent is relied upon for electronic marketing, separate and clear opt-in choices should be provided as necessary for email, text or other relevant communication methods.

Every marketing communication must provide an appropriate and straightforward method of opting out.

The charity will comply with UK GDPR and PECR requirements applying to direct marketing.

13. Sharing Personal Information

Personal information will not automatically require written consent before it can be shared.

Information may be shared where there is an appropriate lawful basis and where sharing is necessary and proportionate.

Potential recipients may include:

- referral organisations;
- organisations directly involved in providing agreed support;
- professional advisers;
- IT, email, website or other service providers acting as processors;
- safeguarding authorities;
- emergency services;
- law enforcement agencies;
- courts or regulatory bodies;
- the Charity Commission;
- the Information Commissioner's Office; or
- other organisations where disclosure is required or permitted by law.

Where consent is the appropriate basis for a particular disclosure, valid consent will be obtained.

Information will not be sold.

Information supplied to funders or used for statistics should normally be anonymised or aggregated so that individual beneficiaries cannot be identified.

14. Safeguarding

Confidentiality and data protection do not prevent the Foodbank from taking appropriate safeguarding action.

Where there is a safeguarding concern involving a child or adult at risk, relevant information may be shared with an appropriate authority where there is a lawful basis for doing so.

Only information necessary and proportionate to the safeguarding concern should be disclosed.

The reasons for significant safeguarding disclosures should be recorded.

15. Data Processors and External Services

Where another organisation processes personal information on behalf of The Okehampton Foodbank, the charity will:

- assess whether the provider offers appropriate data protection and security safeguards;
- establish the respective controller and processor roles;
- put an appropriate written data-processing agreement or contractual terms in place;
- ensure the processor only acts on documented instructions;
- consider the use of sub-processors;
- consider the location in which information is stored or processed; and
- review the arrangement periodically.

This applies, where relevant, to services such as email, cloud storage, payroll, website hosting, databases and other IT services.

16. International Transfers

The charity will not assume that information stored electronically remains physically within the Foodbank or within the UK.

Where a supplier stores or accesses personal information outside the UK, the charity will establish whether the transfer is permitted under UK data protection legislation and ensure that any required safeguards are in place.

17. Information Security

The charity will apply security measures appropriate to the nature and sensitivity of the information processed.

These should include, where appropriate:

- access restricted to those who need information for their role;
- strong passwords;
- multi-factor authentication where available;
- secure email and cloud systems;
- appropriate device security;
- locked storage for paper records;
- secure disposal of confidential paper;
- secure deletion of electronic records;
- regular software and security updates;
- appropriate backup arrangements;
- restrictions on downloading or copying sensitive information;

- confidentiality obligations for trustees, staff and volunteers; and
- prompt reporting of suspected security incidents.

Personal information must not be stored permanently on personal devices or private accounts unless specifically authorised and appropriately secured.

Personal data should not be discussed where conversations can unnecessarily be overheard.

18. Paper Records

The Foodbank will minimise the use of paper records where digital systems provide a secure and proportionate alternative.

Where paper records are required they must:

- contain only necessary information;
 - be stored securely;
 - only be accessible to authorised people; and
 - be confidentially destroyed when the retention period expires.
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19. Retention and Disposal

Personal information will only be retained for as long as necessary.

The charity will maintain a Data Retention Schedule setting out standard retention periods for different categories of records.

Records will be reviewed periodically and securely deleted, destroyed or anonymised when no longer required.

As the Foodbank currently operates a short-term emergency support model, identifiable beneficiary service records should normally be deleted after the approved beneficiary retention period once support has ended, unless there is a documented reason to retain particular information longer.

Examples of reasons for longer retention may include:

- an unresolved safeguarding matter;
- a complaint;
- a legal claim or anticipated legal claim;
- fraud or serious misuse investigation;
- a statutory requirement; or
- another documented legal or regulatory purpose.

Where information is retained for statistical purposes, it should be anonymised wherever possible.

The retention schedule must also separately address staff, volunteer, safeguarding, financial, Gift Aid, DBS and other administrative records because different retention requirements may apply.

20. Accuracy

Reasonable steps will be taken to ensure personal information is accurate.

Individuals should be encouraged to advise the charity if important information changes.

Inaccurate information will be corrected or deleted without undue delay where appropriate.

21. Individual Rights

Subject to the provisions and exemptions contained in data protection legislation, individuals may have the:

- right to be informed;
- right of access;
- right to rectification;
- right to erasure;
- right to restriction of processing;
- right to data portability where applicable;
- right to object to processing; and
- rights relating to certain automated decision-making and profiling.

Where processing is based on consent, individuals also have the right to withdraw that consent.

The charity will not automatically treat every request for deletion as requiring immediate deletion. The request will be considered against the lawful basis, purpose of processing and any legal requirement or other lawful reason to retain the information.

22. Subject Access Requests

An individual may ask for confirmation that the Foodbank processes their personal information and may request a copy of that information.

A subject access request does not have to use any particular wording and does not normally need to be made on a specific form.

Requests must be forwarded promptly to the Data Protection Lead.

The Foodbank will normally respond without undue delay and within one month of receiving a valid request.

Where legislation allows an extension because a request is complex or because a number of requests have been received, the individual will be informed within the initial one-month period.

Identity may be verified where reasonably necessary before personal information is disclosed.

Information concerning another person will not be disclosed merely because it appears within the requester's records; third-party rights and applicable exemptions will be considered.

23. Personal Data Breaches

A personal data breach includes accidental or unlawful:

- loss;
- destruction;
- alteration;
- unauthorised disclosure; or
- unauthorised access to personal information.

Examples include losing paperwork containing beneficiary details, sending an email to the wrong recipient, loss of an unsecured device, inappropriate access to records or disclosure of confidential information.

All suspected personal data breaches must be reported immediately to the Data Protection Lead.

The charity will:

- contain and investigate the incident;
- assess the potential effect upon individuals;
- maintain an internal breach record;
- take appropriate remedial action;
- determine whether the ICO must be notified; and
- determine whether affected individuals must be informed.

Where a breach is likely to result in a risk to people's rights and freedoms, the charity will notify the Information Commissioner's Office without undue delay and, where feasible, within 72 hours of becoming aware of the breach.

Where a breach is likely to result in a high risk to an individual, the affected person will also be informed without undue delay unless an applicable exception applies.

24. Data Protection by Design and Default

Data protection will be considered when developing new systems, forms, referral arrangements and ways of working.

The charity will seek to:

- collect less information where possible;
- avoid unnecessary duplication;
- use anonymised data where identification is unnecessary;
- limit access;
- establish appropriate retention periods at the outset; and
- choose systems with appropriate privacy and security controls.

25. Data Protection Impact Assessments

Before beginning processing which may be likely to result in a high risk to individuals, the charity will assess whether a Data Protection Impact Assessment (DPIA) is required.

A DPIA should be considered particularly where there is:

- a significant new digital system;
- large-scale processing of sensitive information;
- systematic monitoring;
- extensive profiling;
- new technology;
- significant data matching; or
- another form of processing presenting an increased privacy risk.

The outcome and decisions arising from a DPIA will be documented.

26. Records of Processing Activities

The charity will maintain appropriate documentation describing its processing activities.

This will include, where applicable:

- categories of individuals;
- categories of personal information;
- purposes of processing;
- lawful bases;
- special-category conditions;
- recipients;
- processors;
- retention periods;
- information security arrangements;
- international transfers; and
- other information required by law.

The record will be reviewed when processing activities change.

27. Volunteers, Staff and Trustees

Trustees, employees and volunteers with access to personal information must:

- read and comply with this policy;
- maintain confidentiality;
- only access information necessary for their role;
- not use information for personal purposes;
- follow approved security procedures;
- immediately report loss, inappropriate disclosure or suspected breaches; and
- complete appropriate data protection training.

A volunteer's access to personal data should end when that access is no longer required.

28. Training

Appropriate data protection and confidentiality training will be provided to those handling personal information.

Training should be refreshed periodically and following material changes in the law, policy or systems.

Trustees should receive sufficient information to enable them to exercise appropriate oversight of the charity's data protection responsibilities.

29. Complaints

Anyone concerned about how their personal information has been handled should contact:

The Data Protection Lead
The Okehampton Foodbank
The Ockment Centre
31 North Street
Okehampton
EX20 1AR

Email: contact@okehamptonfoodbank.co.uk

The charity will investigate data protection complaints fairly and promptly.

Individuals also have the right to raise concerns with the Information Commissioner's Office (ICO).

30. Accountability and Supporting Documentation

This policy forms part of the charity's data protection arrangements but does not, by itself, demonstrate complete UK GDPR compliance.

The charity will maintain appropriate supporting documentation, including as necessary:

- a Privacy Notice;
 - a Record of Processing Activities/data map;
 - a Data Retention Schedule;
 - consent records;
 - legitimate interests assessments where appropriate;
 - special-category processing records;
 - an Appropriate Policy Document where required by the Data Protection Act 2018;
 - processor contracts;
 - data-sharing arrangements;
 - breach and incident records;
 - DPIAs where required;
 - marketing preference records; and
 - relevant staff and volunteer procedures.
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31. Policy Review

The Trustees will review this policy at least annually and sooner where:

- data protection legislation or ICO guidance changes;
- the charity introduces a significant new system or processing activity;
- the categories of information collected materially change;
- a significant personal data breach occurs; or
- a review identifies weaknesses in existing arrangements.

Amendments must be approved by the Trustees.

32. Trustee Approval

This policy was approved by the Trustees of THE OKEHAMPTON FOODBANK on:

Date: _____

Chair/authorised Trustee: _____

Signature: _____

Next review due: _____