



The FAN Charity – Policies

Data Protection Policy and Procedures

Introduction

The FAN Charity recognises that everyone has rights with regard to the way that their personal data is handled. The FAN Charity needs to collect and use certain types of data in order to carry on our work.

Volunteers, staff and Board of Trustees who collect, hold and use personal data on behalf of The FAN Charity will need to understand and comply with this policy.

Purpose

The purpose of this policy is to set out the FAN Charity commitment and procedures for protecting personal data. The FAN Charity regards the lawful and correct treatment of personal information as very important for successful working, and for maintaining the confidence of those with whom we deal.

Definition of data protection terms.

Data is information which is stored electronically, on a computer or in certain paper-based filing system.

Data Controller – The legal ‘person’ responsible for complying with the Data Protection Act. In our case the FAN Charity.

Data Users are employees and volunteers whose work involves processing personal data. Data users must protect the data they handle in accordance with the Data Protection Policy and any applicable data security procedures at all times.

Data Subject – The individual whose personal information is being held or processed by the FAN Charity.

Information Commissioner – The UK Information Commissioner is responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing or disclosing personal information

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Personal Information – Information about living individuals that enables them to be identified, it can be factual (e.g. name, address, date of birth) or it can be an opinion about that person, their actions and behaviour.

The Data Protection Act Legislation

This contains 8 principles for processing personal data with which FAN Charity will comply. Personal data ...

1. Shall be processed fairly and lawfully and 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
7. Shall be kept secure
8. Shall not be transferred to a country without adequate protection

NB Individuals have a right to have data corrected if it is wrong, to prevent use that is causing them damage or distress, or to stop marketing information being sent to them.

Consent

Informed consent is central to the concept of Data Protection.

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.

FAN Charity 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, The FAN Charity 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

Responsibilities

The FAN Charity is a not-for-profit organisation and as such is not required to register under the Data Protection Act 1998. It is however required to abide by the legislation. This policy explains how it will meet the requirements of the Data Protection Act 1998 (DPA) as modified by the requirements of the General Data Protection Regulations (GDPR) from May 2018 and amended by the Data (Use and Access) Act 2025.

The FAN Charity will remain the Data Controller for the information held. FAN Charity staff will be personally responsible for processing and using personal information in accordance with the Data Protection Act.

Applying the Data Protection Act within the FAN Charity

Board of Trustees, staff and volunteers running the FAN Charity, who have access to personal information, will be expected to read and comply with this policy.

Whilst access to personal information is limited to the staff and volunteers at the FAN Charity, the FAN Charity may undertake additional tasks which involve the collection of personal details from members of the public. In such circumstances, we will let people know why we are collecting their data and it is our responsibility to ensure the data is only used for this specific purpose.

Data users are obliged to comply with this policy when processing personal data on our behalf.

The Board of Trustees will consider legal requirements and ensure that the policy is properly implemented, and will, through appropriate management, strict application of criteria and controls:

- Observe fully 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 fulfill its operational needs or to comply with any legal requirements,
- Ensure the quality of information used and ensuring it is accurate
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken
 - The right to access one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information

Practice

Data users will:

- Take appropriate technical and organisational security measures to safeguard personal information including a secure lockable HR file.
- Hold Databases of e.g. Trustees, Facilitators, and Members to be held on password-protected computers.
- FAN does not collect data on protected characteristics and any data shared for reporting purposes is anonymised.
- Ensure all data is given voluntarily with information regarding the lawful basis on which the data collected explicitly stated at the time of collection. This information also confirms the FAN Charity as the relevant Data Controller. A document specific to all likely groups from whom FAN may collect personal data accompanies this policy: Trustees, Members, Facilitators, requests by other organisations or individuals who want to be kept up to date. For all personal data collected by FAN, the lawful basis for collection is 'the legitimate interest' with implied consent to receive information about events (which constitutes their interest in the work of FAN).
- All Group emails must be sent blind copied from password-protected machines.
- Text messages (SMS) giving information about FAN can be sent as group messages as no individual information is shared by messaging in this way.
- WhatsApp groups must not be used as this shares personal information. Individual WhatsApp messages can be sent.

- Indicate that a recipient can opt out of emails by putting STOP in the subject line on all marketing or information emails.
- The DPA states that Subject Data should not be kept longer than is necessary. Staff are required to regularly review and clean data they hold. Data is removed when requested to do so. Disposal of equipment and papers – machines are wiped and documents shredded.
- Ensure that personal information is not transferred abroad without suitable safeguards,
- Ensure similar good practice is adopted by local Facilitators holding lists. Good practice guidelines are included in Facilitator Training, discussed in Facilitator Get Togethers, specific GDPR instruction and annual reminders are sent stating good practice.
- Information is provided for new FAN participants outlining why they may want to provide Facilitators with basic personal information so that they can be kept informed about FAN matters
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Data Subject Access Requests: the procedure for responding is: They should be in writing (letter or email) or by phone call, and all staff should pass the request on to the Board of Trustees without delay. The identity of the requester should be verified, no charge will be made, and it should be done in one month.

Members of the public may request certain information from a Local Authority under the *Freedom of Information Act 2000*. The Act does not apply to the FAN Charity. However, if at any time we undertake the delivery of services under contracts with the Local Authority we may be required to assist them to meet the Freedom of Information Act request where we hold information on their behalf.

The Board of Trustees will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- Ensuring everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Ensuring everyone processing personal information is appropriately trained to do so
- Ensuring everyone processing personal information is appropriately informed regarding correct procedure

- Ensuring anybody wanting to make enquiries about handling personal information knows what to do
- Dealing promptly and courteously with any enquiries about handling personal information
- Describing clearly how it handles personal information 'subject access request'
- Regularly reviewing and audit the ways it holds, manages and uses personal information this needs to be built into Trustee agendas
- All staff and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them
- Information will be stored for only as long as it is relevant to FAN activities and will be disposed of appropriately. It will not be stored as a 'just in case' basis.

Complaints

Anyone wishing to raise a complaint on how the FAN Charity has handled his or her personal data can contact the Charity to have the matter investigated. Phone 07880-630553 or email dataprotection@thefancharity.org

If the complainant is not satisfied with the response or believes the FAN Charity has not processed their personal data in accordance with the law, they can complain to the Information Commissioner's Office <https://ico.org.uk/>

Breach Reporting

The FAN Charity records are monitored regularly by the relevant Trustee. Any breaches of these Data Protection requirements are recorded, available for inspection and disclosed to the Board of Trustees.

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 Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the FAN Charity dataprotection@thefancharity.org

Disclosure

The FAN Charity may be required to share data with other authorities or 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 FAN Charity 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.

FAN Charity 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.

Please see below a table showing the personal data held by FAN Charity updated having read the ICO guidelines

NB Security measures for all includes explicit consent, specific use, removing information when requested or out of date, as identified in this policy

	Who holds what and how?	Security measures	From	Shared?
Staff members	Designated trustees; names, contact details, financial details	Locked file, strong password protected phone or computer	Staff members	Yes with pension and paying bodies
Trustees	FAN staff Designated Trustees. Names, contact details, DOB	Password protected phone or computer	Trustees	Charity Commission, Companies House, other trustees, FAN Staff
Facilitators	FAN staff; Designated trustees. Names contact details	Password protected, blind copies	Facilitators	No
Members	Designated Trustees. Names, contact details	Password protected, blind copies	Members	No
Individuals	Staff or relevant	Password protected	People	Yes to other

requesting information about FAN	Trustees; activity from events; email Groups; Welcome All email address holder. Email or phone plus name		requesting information	facilitators as requested
Group participants	Facilitators. Names, emails and or phone numbers	Password protected, blind copied or individual messages on WhatsApp or text groups. Facilitators are clear about good practice for holding and using participant data, training, reminders	People attending Groups	No
Events	Staff and designated Trustees. Name, email, phone	Password protected and encrypted files	Invitees	No
Donors	Designated Trustees. Name, contact details			

Further information

FAN Charity: Information Guide: [Data Protection Guidelines for Volunteer Facilitators](#), June 2026

[Charity Finance Group | GDPR for Small Charities](#), 2023

[Information Commissioner's Office](#)

[Data Protection Act 2018](#)

[UK General Data Protection Regulation | ICO](#)

[Data \(Use and Access\) Act 2025 | ICO](#).

[Advice for small and medium organisations | ICO](#)

Reviewed by FAN Charity: Working Group: Marketing and Communications
26.2.26 and 11.6.26

Adopted by Board of Trustees: 18.6.2026

Signed: 
Ian Thomson

Role: Chairman

Date: 18.6.2026