

Catch22 group policy

Data Protection – Recording of Processing Activity

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>Governance & Risk</i>
Queries to:	<i>Data Governance Manager</i>
Date created:	<i>31 May 2018</i>
Date of last review:	<i>June 2023</i>
Date of next review:	<i>June 2024</i>
Catch22 group, entity, hub:	<i>Catch22 group</i>
4Policies level (all staff or managers only)	<i>All staff</i>

Version	Last modified	By	Changes Made
1.0	31/01/2023	Beverley Clark	Policy reviewed - no changes made.
2.0	30/06/2023	Beverley Clark	Policy reviewed - no changes made.

Catch22 GDPR standards

When processing personal data staff will uphold the following standards, where possible:

- Model of least privilege**
 Staff will ensure that security controls are implemented, to data held physically and electronically, to ensure that personal data is only accessed by staff that have a defined need to access it.
- Data minimisation**
 Staff will limit the collection of personal information to that which is directly relevant and necessary to accomplish a specified purpose.
- Data subject rights**
 Staff will ensure that the rights that are afforded to individuals under the GDPR are upheld appropriately and in accordance with the regulation and associated legislation.
- Accountability**
 Staff will adhere to and remain compliant with the seven GDPR principles and contribute to demonstrating the organisations compliance.
- Anonymisation, Pseudonymisation and Encryption**
 Where possible and appropriate staff will look to anonymise/pseudonymise and encrypt personal data in order to protect the privacy rights of individuals.

1. Policy statement

The United Kingdom General Data Protection Regulation (UKGDPR) requires that organisations keep records of their processing activities (Article 30). Catch22 will comply with the requirement by ensuring that records are kept of the personal data processing that is undertaken in our roles both as a data controller and a data processor.

2. Recording of processing activity

Article 30 of the UKGDPR requires that each controller and processor keep the following records: -

Data Controllers

Data controllers, or their representatives, shall maintain a record of the processing activities under their responsibility. The record shall contain all of the following information: -

- Name and contact details of the controller plus
 - Any joint controllers
 - Controllers representative
 - Data protection officer
- Purpose(s) of the processing
- Category/ies of data subject
- Category/ies of personal data
- Category/ies of recipient(s) of personal data
- Any transfer to third country or international organisation plus
 - Documentation of suitable safeguards
- Time limits for erasure where possible
- General description of the technical and organisational security measures

Data Processors

Each processor, or processor's representative, shall maintain a record of all the categories of processing activities carried out on behalf of a controller. The record shall contain all of the following information: -

- Name and contact details of the processor(s) and the controller plus
 - Any joint controllers
 - Controllers and/or processors representative
 - Data protection officer
- Category/ies of processing carried out on behalf of each controller
- Any transfer to third country or international organisation plus
 - Documentation of suitable safeguards
- General description of the technical and organisational security measures

3. Recording methods

A simple Excel spreadsheet can be used to record the information. An example is given at Appendix A.

4. Definitions

For definitions, please see the Data Protection: Over-arching Policy 2022.

5. Review

This policy will be reviewed every two years or on an ad hoc basis as necessary

6. Related policies

Data Protection Policy Suite

Appendix A – Example Record of Processing Activity

	Business objectives	Purpose	Processing activities (if known)	Article 6 Lawful basis	Article 9 Lawful basis (special category)	Lawful basis - references or supporting evidence	Categories of Data Subjects	Categories of Personal Data	Categories of Recipients	Transfers to 3rd countries (where applicable)	Condition for Transfer	Retention period (or criteria used)
1	Charitable Purposes	Promoting awareness of the organisation's charitable objectives by channels for which consent is not required)	Sending unsolicited direct marketing communications by post or phone (to non-TPS-registered numbers)	Legitimate interests A 6.1(f)	N/A	[Insert details, or make reference to where, the legitimate interests assessment is stored]	Donors Supporters Prospects Allied Professionals General Public	Contact and identification details	Suppliers of marketing platforms			
2	Charitable Purposes	Promoting awareness of the organisation's charitable objectives	Sending unsolicited direct marketing communications by email, phone (to TPS-registered numbers), SMS	Consent A 6.1(a)	N/A	[Insert details, or make reference to where, consent records are stored/maintained]	Donors Supporters Prospects Allied Professionals General Public	Contact and identification details	Suppliers of marketing platforms			
3	Governance and Infrastructure	Managing suppressions of people who have declined electronic direct marketing communications	Flagging, retention, checking of contact details and channel preferences to be suppressed	Legal obligation A 6.1(c)	N/A	Privacy & Electronic Communications Regulations 2003	Beneficiary/Service User Customer Supporter (non-financial, including Members) Donor, Prospect Allied Professional Employees/volunteers/ contractors General public	Contact and identification details	Information Commissioner's Office Suppliers of marketing platforms Fundraising Regulator Auditors			
4	Governance and Infrastructure	Meeting tax obligations	Collecting, retaining, disclosing Gift Aid declarations, VAT records	Legal obligation A 6.1(c)	N/A	Finance Act 2010	Donors Customers Suppliers	Donors Customers Suppliers	HMRC Charity Commission Fundraising Regulator Auditors			Record financial year + 6
5	Governance and Infrastructure	Preventing, detecting and investigating fraud	Collecting, retaining, analysing expenses claims, donation and other income records, supplier payments, checking payment card validity	Legitimate interests A 6.1(f)	N/A	UKGDPR Recital (47) [Insert details, or make reference to where, the legitimate interests assessment is stored]	Donors Customers Suppliers Employees/volunteers/contractors	Contact and identification details Financial or economic status or transactions	Law enforcement Anti-fraud agencies Suppliers of banking and payment processing services			
6	Governance and Infrastructure	Meeting child and vulnerable adult protection obligations	Checking the Disclosure & Barring Service list and evaluating the risk of criminal convictions or law enforcement intelligence	Legal obligation A 6.1(c)	N/A	Safeguarding of Vulnerable Groups Act 2006	Employees/volunteers/contractors Applicants	Contact and identification details Criminal convictions Job title, employment terms	Public sector commissioners			
7	Governance and Infrastructure	Meeting obligations under consumer protection law	Sending direct marketing communications by post	Legitimate interests A 6.1(f)	N/A	[Insert details, or make reference to where, the legitimate interests assessment is stored]	Donors, Supporters, Prospects Allied Professionals, General Public	Contact and identification details	Suppliers of marketing platforms			
8	Income Generation	Soliciting donations and/or non-financial support	Sending direct marketing communications by post	Legitimate interests A 6.1(f)	N/A	[Insert details, or make reference to where, the legitimate interests assessment is stored]	Donors Supporters, Prospects Allied Professionals, General Public	Contact and identification details	Suppliers of marketing platforms			
9	Income Generation	Soliciting donations and/or non-financial support	Sending unsolicited direct marketing communications by email, phone (to TPS-registered numbers), SMS	Consent A 6.1(a)	N/A	[Insert details, or make reference to where, consent records are stored/maintained]	Donors Supporters, Prospects Allied Professionals, General Public	Contact and identification details	Suppliers of marketing platforms			
10	Income Generation	Identifying target groups/individuals to solicit/encourage further support	Categorisation by demographics and/or interaction history, collecting and profiling data from public sources, disclosure to screening/profiling agencies, disclosure to social media platforms for profiling/matching	Legitimate interests A 6.1(f) OR Consent A 6.1(a)	Consent: A 9.2(a)	[Insert details, or make reference to where, the legitimate interests assessment is stored] OR [Insert details, or make reference to where, consent records are stored/maintained]	Donors, Supporters, Prospects	Contact and identification details Descriptors and demographics Family and social circumstances Financial or economic status or transactions Education, profession and skills Racial/ethnic origin information or inference Health information or inference Sexuality, sexual life information or inference Religion or spiritual beliefs information or inference Record of interaction Hobbies, leisure activities and interests Political opinions Job title, employment terms	Suppliers of profiling/screening services Social media companies			

11	Workforce Management	Administration of employment relationship	Generation, issue, retention of employee pay and absence records	Legal obligation A 6.1(c)	Employment law: A 9.2(b)	Legal obligation Sick Pay Act 1994 Working Time Regulations 1998 National Minimum Wage Act 1998 Employment Act 2002 Agency Workers Regulations 2010	Employees/contractors	Contact and identification details Financial or economic status or transactions Job title Employment terms	Employment Tribunal Legal representatives HMRC			
12	Workforce Management	Meeting Health & Safety compliance obligations	Generation, retention, disclosure of accident reports, risk assessments, H&S representative information, First Aider information	Legal obligation A 6.1(c)	Legal obligation: A 9.2(f) Public interest: A 9.2(g)	Health & Safety At Work Act 1974 Management of Health & Safety At Work Regulations 1999	Employees/volunteers/contractors Beneficiary/service user Customer/Supporter/Donor General public	Contact and identification details, Health information or inference Education, profession and skills	Health & Safety Executive Insurers Legal representatives Auditors			
13	Workforce Management	Meeting immigration law obligations	Pre-employment right-to-work and identity checks (collecting, checking, retaining)	Legal obligation A 6.1(c)	Employment law: A 9.2(b)	Nationality Immigration and Asylum Act 2002	Job applicants	Contact and identification details Education, profession and skills	Home Office Law enforcement			
14	Workforce Management	Providing and administering employee pensions	Generation, retention, disclosure of pension enrollment records	Legal obligation A 6.1(c)	N/A	Pensions Act 2008	Employees Nominated Beneficiaries	Contact and identification details Financial or economic status or transactions	Pensions provider/broker Auditors HMRC DWP			
15	Workforce Management	Appointing suitable Trustees	Checking unspent criminal convictions, bankruptcy status, list of disqualified directors, list of disqualified Trustees	Legal obligation A 6.1(c)	N/A	Charities Act 2011 Charities (Protection and Social Investment) Act 2016	Volunteers Allied Professionals General Public	Contact and identification details Criminal convictions Financial or economic status or transactions	N/A			

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Data protection: Recording processing activity policy
EIA completed by:	Beverley Clark, Data Governance Manager
Date of assessment:	11 January 2023
Assessment approved by:	

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	

Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.