



PRIVACY /GDPR POLICY

of Queen's Crescent Community Association

SEPTEMBER 19, 2024

Queen's Crescent Community Association
45 Ashdown Crescent, London, NW5 4QE

Content

- 1. Introduction**
- 2. Compliance**
- 3. General Data Protection Regulations (GDPR)**
- 4. Data We Collect**
- 5. Responsibilities**
- 6. Disclosing Your Information & External Partnerships**
- 7. Breaches of Procedure or Loss of Data**
- 8. Data Protection Principles**
- 9. Consent as a Basis For Processing**
- 10. Subject Access Rights**
- 11. Disclosure of Data**
- 12. Publication of Information**
- 13. Soft opt-in**
- 14. Email**
- 15. Recruitment & Selection**
- 16. Employment Records**
- 17. Guidance to Staff**
- 18. Procedure For Review**

1) Introduction

1.1 Queen's Crescent Community Association (QCCA) is a registered charity (1096655) and a company limited by guarantee (04393769) working to support a thriving voluntary and community sector in and around London borough of Camden. We support 3000 members a year with our services for older people, young people and families, our services are free or heavily subsidised. We manage to do this thanks to our charitable funders and our trading activities.. We hope that the obligations outlined in this Data Protection and Privacy Statement help you to understand how we process your data, however if you do have any questions about anything in this statement or about our data protection processes please contact our Chief Executive Officer, Foyezur Miah.

1.2 QCCA is committed to a policy of protecting the rights and privacy of service users, volunteers, staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018. The regulatory environment demands higher transparency and accountability in how organisations manage and use personal data. It also accords new and stronger rights for individuals to understand and control that use. The GDPR contains provisions that an organisation will need to be aware of as data controllers, including provisions intended to enhance the protection of individual's personal data.

1.3 In order to help people who use our services to understand how and why personal data is collected, used and stored, we have prepared this notice. This policy is broken down into sections which relate to each area of our service and these sections will be made available to individuals when they sign up to use the relevant service. Also, a full copy of these policies, or whichever sections are relevant to your data, are available on request at any time.

1.4 QCCA will ensure that its Privacy Notice is written in a clear and plain way that staff and service users will understand. QCCA needs to process certain information about its staff, volunteers and service users and other individuals with whom it has a relationship for various purposes such as those listed in QCCA's Privacy Notice, including, but not exclusively;

- The recruitment and payment of staff
- Users of QCCA services
- Complying with legal obligations to funding bodies and statutory partners including local government

1.5 To comply with various legal obligations, including the obligations imposed on it by the GDPR, QCCA must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

2) Compliance

2.1 This policy applies to all staff and volunteers of QCCA. Any breach of this policy or of the Regulation itself will be considered an offence and the organisation's disciplinary procedures will be invoked. As a matter of best practice, other agencies and individuals working with QCCA and who have access to personal information, will be expected to read and comply with this policy.

2.2 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 to the GDPR and other relevant legislation. The Privacy Notice on GDPR for QCCA gives further detailed guidance and QCCA undertakes to adopt and comply with the Privacy Notice.

3) General Data Protection Regulations (GDPR)

3.1 This piece of legislation came in to force on the 25th May 2018. The GDPR regulates the processing of personal data, and protects the rights and privacy of all living individuals (including children), for example by giving all individuals who are the subject of personal data a general right of access to the personal data which relates to them. Individuals can exercise the right to gain access to their information by means of a 'subject access request'.

3.2 Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images) and may include facts or opinions about a person.

3.3 For more detailed information on these Regulations see the [Data Protection Data Sharing Code of Practice](#) (DPCoP) from the [Information Commissioner's Office](#) (ICO).

4) Data We Collect

4.1 The collection of your Personal Information from our website and other services will vary depending on which our services you have accessed / are accessing. QCCA will make every effort to gather and collect accurate data from you and also assumes that the information you are giving is accurate and up to date. QCCA requests that all service users make every effort to update QCCA regarding any changes to your data. Section 8 has further details on your rights regarding your data.

- A. Core Services:
- B. Promoting Services
- C. Customers
- D. Event Attendees
- E. Social Prescribing Service
- F. Our Staff
- G. Email Mailing List Subscribers
- H. Photography Consent & Usage

A. - Core Services

Data about local organisations is maintained on our electronic databases and includes the contact details of trustees, staff and/or volunteers within those organisations. This data is collected when an organisation requests QCCA's core services; infrastructure/developmental support, funding advice, training, governance guidance, trustee and volunteer recruitment.

The above is considered by QCCA's Trustees to be Business Contacts and therefore not subject to the GDPR. The Trustees are however committed to good practice and will endeavour to ensure the same privacy and security settings that are followed for personal data are applied to the above.

B. - Promoting Services:

When: Your organisational data will be collected upon requesting to advertise an opportunity, event, activity, service offer, charitable work or project, etc, on our newsletters, social media or elsewhere, on any relevant platforms.

What: We will collect information that will enable us to support and deliver our service effectively. This may include; main contact name, organisation and/or opportunity address, contact details (email and telephone), activity or event date and timings, opportunity or service offer details, etc.

Use of data: To communicate with you about opportunities or listings we are advertising on your organisation's behalf. Your listing(s) will be added to any relevant platform, including but not limited

to social media, and/or newsletters. You can opt out of receiving updates or having your opportunity being advertised at any time by contacting the Administration and Marketing Officer.

Data sharing: QCCA will only share the information given to us upon expression of interest in advertising an opportunity. Information is recorded and retained in order to fulfil the organisational objective of sharing, promoting and aiding the development and growth of the voluntary and community sector, and this has been categorised as a legitimate business aim for QCCA. Limited sets of your data may be shared with other members of the QCCA team to offer organisational development support, if you require this.

C. – Volunteers

When: Your personal data will be collected upon registering an interest in volunteering in QCCA.

What: We will collect information that will enable us to support and deliver our service effectively. This may include; name, address, contact details (email and telephone), date of birth, demographic data including gender, age, ethnicity, employment status, disability and carer status (Demographic data is classed as “special categories of personal data” and is optional) and we will ask for additional relevant information to risk assess and support the individual as best as possible.

Use of data: To communicate with you about volunteering opportunities, particularly; suitable opportunities, those that you have expressed an interest in or chosen to pursue and consent will be taken at initial contact to share your details with partner agencies offering a potentially suitable opportunity. You can opt out of receiving up dates/ contact at any time by contacting the Volunteer Centre Manager.

Data sharing: QCCA will only share the information given to QCCA upon expression of interest in becoming a volunteer. Information is recorded and retained in order to fulfil the organisational objective of matching local people with volunteering roles and this has been categorised as a legitimate business aim for QCCA. We also use an external platform for our Registration Forms which stores data on its own online servers and has their own relevant Privacy Policy

Corporate Group Volunteers –

When: Your company’s data will be collected upon registering an interest in staff within your organisation volunteering their time for a one-off opportunity.

What: We will collect information that will enable us to support and deliver our service effectively. This may include; your name, company address, contact details (email and telephone), number of volunteers, interests, available timings, and we will ask for additional relevant information to risk assess and support the group as best as possible.

Use of data: To communicate with you about occasional corporate social responsibility opportunities, particularly; local organisations or locations with suitable opportunities, those that you have expressed an interest in or chosen to pursue. Consent will be taken at initial contact to share your details with partner agencies offering a potentially suitable opportunity and taking your group of volunteers for one or multiple days. You can opt out of receiving up dates/ contact at any time by contacting the Volunteer Coordinator.

Data sharing: QCCA will only share the information given to QCCA upon expression of interest in becoming a volunteer. Information is recorded and retained in order to fulfil the organisational objective of matching local staff groups with volunteering tasks and this has been categorised as a legitimate business aim for QCCA. We also use an external platform for our Registration Forms which stores data on its own online servers and has their own relevant Privacy Policy

D. - Event Attendees

When: Your personal and organisational data will be collected upon registration or on the day sign in.

What: Depending on the event we will collect information that will enable us to contact you with information relating to the event and ensure that any special needs are provided for. This may

include; name, email address, telephone number, organisation, access/ mobility issues and dietary requirements. You may also be asked whether you wish to join any of our relevant mailing list, in which case your information will then become bound to the information laid out below in section I. Email Mailing List Subscribers.

Use of data: To communicate with you in relation to the event you are booking into only. This will include sending confirmations, joining instructions and post event feedback requests.

E. - Social Prescribing Service

When: Service user's and the referrer GP's data will be collected at point of referral and at the point of any face to face meeting, should one take place.

What: We will collect information that will enable us to support and deliver our service effectively. This may include; name, address, contact details (email and telephone), date of birth, registered GP surgery, reason for accessing the service, demographic data including gender, age, ethnicity, employment status, disability and carer status (Demographic data is classed as "special categories of personal data" and is optional) and we will ask for additional relevant information to risk assess and support the individual as best as possible.

Use of data: To support you as per the purpose of the scheme, to communicate effectively with you regarding the service and for monitoring and reporting purposes (data will often be anonymised for monitoring and reporting).

Data Sharing: Details may be shared with a third party but only with explicit consent which will be obtained at referral stage and then again at point of the need for information to be shared.

F. - Our Staff

What: QCCA holds personal data on its employees in order to process payroll, its obligation in relation to paying National Insurance, PAYE and Pensions, to keep employment (HR) records and provide references as required. Employee records are stored both electronically in password protected/ limited access documents and in hard copy. In both cases this data is accessible to the QCCA General Manager, the Finance Manager and can be made available to the QCCA trustee board as appropriate.

Use of Data: Information to process Payroll is shared with our Payroll provider: Stately Accountants, Information that enables us to provide the Workplace pension is shared with our Pension Provider: Smart Pension. Details of their commitment to data protection legislation and privacy can be accessed directly with the organisation. Personal data of QCCA's volunteers will be held for the same length of time as employees.

G. - Email Mailing List Subscribers

When: Your email address and full name will be collected, (details such as your organisation or phone number are optional fields and are not automatically collected or recorded in our mailing lists) either through written or email consent, which will be stored by us, or via one of our online sign up forms.

What: We use Mailchimp for most of our email campaigns, including our weekly Newsletters, Funding Alerts, Volunteer Pool opportunities, but please note that by signing up through one of our online hosted sign-up forms, you are not only consenting to our privacy policy and the storage of your data by QCCA, but also to Brevo policy too. Any emails which are sent by QCCA as part of a mailing list which is not integrated into Brevo, will not have the Brevo logo at the bottom and are controlled and managed by the individual staff member who owns the list. Contacts should communicate any issues within these types of lists directly to the staff member who sends the emails.

Use of data: We will only use your details to send you emails relating to the topic you subscribed to. If an error occurs and you receive an email you are not subscribed to, please let us know as soon as possible so we can rectify the mistake in our system. We will periodically update our

mailing lists and will request that you update your preferences to ensure that clear consent to receive our communications has been given. If no response to these subscription confirmation requests is made by inactive subscribers within one month of the initial email being sent, the contact will be removed from our lists.

H. - Photography Consent & Usage

When: Photographs and videos of an individual or group may be collected, with either written or email consent given, which will be stored by us and/or via one of our online sign up forms.

What: We sometimes take photos or videos when completing our work, whether this is at our offices, on a volunteer activity/task, at a community event, etc.

Use of data: These images and videos may be used in a variety of content, whether this is on physical marketing materials, on any of our websites, and/or in social media posts, etc. We will only use your personal likeness in these images or videos with your consent, or, if the subject in question is under the age of 18, with a parent or guardian's consent. If you find any images or videos we have used within our marketing which contain you, and you would no longer like to be included, please contact our Administration and Marketing Officer to let us know and have them removed.

5) Responsibilities

5.1 QCCA will be the 'data controller' under the terms of the legislation – this means it is ultimately responsible for controlling the use and processing of the personal data. QCCA appoints a Data Protection Officer (DPO), currently the Chief Executive Officer, who is available to address any concerns regarding any data and how it is processed, held and used.

5.2 The QCCA trustee board are responsible for overseeing this policy. Line managers are responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the organisation.

5.3 Compliance with the legislation is the personal responsibility of all staff and volunteers within the organisation who process personal information. Individuals who provide personal data to QCCA are responsible for ensuring that the information is accurate and up to date.

6) Disclosing Your Information & External Partnerships

6.1 We won't share your information with any other organisations for marketing, market research or commercial purposes, and we don't pass on your details to other websites. We are subject to the law like everyone else. Sometimes, we must process/ disclose your information in order to comply with a statutory obligation or contract. This includes exchanging information with government departments for legal reasons.

6.2 QCCA does work in partnership with other organisations and companies as well as signposting service users to external websites and organisations. QCCA is not responsible for the privacy policies or practices of any third party. Key organisations QCCA works with or uses, such as Mailchimp, Survey Monkey, Eventbrite, Jotform and our own IT provider have shared their privacy policies with us or have them readily available on their own websites.

7) Breaches of Procedure or Loss of Data

7.1 Any breach of confidentiality should be reported to the Data Protection Officer (DPO), who will then appoint an appropriate independent person (eg. a member of the board of trustees or a senior member of staff) to investigate the matter. If, following a written summary of findings, the DPO finds that a breach has occurred, they have the discretion to take appropriate action within 28 days. This

may include consideration of pursuing disciplinary action or, in the case of a volunteer, asking the person to withdraw from QCCA's service.

7.2 QCCA takes all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will take reasonable technical and organisational precautions to store, process and transport all personal information you provide in a secure manner. Information is stored in a number of different places securely. These include locked cabinets and filing systems and secure password protected databases. QCCA's IT system has permissions set up throughout ensuring only relevant, qualified staff (or volunteers) have access to the information required for them to deliver their services/ do their job. No personal data is stored outside the secure, locked or restricted areas of QCCA's IT system or office space. Any forms, information or documents are securely disposed of once data has been inputted and/ or the information is no longer required by QCCA.

8) Data Protection Principles

8.1 The legislation places a responsibility on every data controller to process any personal data in accordance with the eight principles. Please visit the [ICO's website](#) for more detail on the eight principles. QCCA undertakes to adhere to the eight principles outlined below:

1 –QCCA must process personal data fairly and lawfully.

2 –QCCA must process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.

3 –QCCA must ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed. QCCA will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained.

4 –QCCA must keep personal data accurate and, where necessary, up to date. QCCA will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify QCCA if, for example, a change in circumstances mean that the data needs to be updated. It is the responsibility of QCCA to ensure that any notification regarding the change is noted and acted on. Under the right of rectification, QCCA will correct any inaccurate or incomplete data within 28 days of notification. QCCA will also inform any third parties, if applicable, of these rectifications.

5 –QCCA must only keep personal data for as long as is necessary. QCCA undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements. The categories of data listed below have to be retained under the following specific criteria:

- Personal data of donors associated with finance data must be retained for at least six years.
- Personal data associated with records of transactions/purchases needs to be kept for at least six years.
- Personal data of employees needs to be retained for six years with reference to payroll and ten years with reference to pension information.
- Personal data of volunteers and trustees needs to be retained for at least six years if it is associated with financial transactions. General personal data and records of volunteer's information will be retained for one year after a volunteer has either been placed at an external organisation or started a voluntary role or task.
- Personal data of clients under any of our wellbeing schemes will be retained eight years after discharge.

- Any personal data will be retained for seven years if it relates to a formal complaint.

6 –QCCA must process personal data in accordance with the rights of the data subject under the legislation. Individuals have various rights under the legislation including a right to:

- be told the nature of the information QCCA holds and any parties to whom this may be disclosed.
- prevent processing likely to cause damage or distress.
- prevent processing for purposes of direct marketing.
- be informed about the mechanics of any automated decision taking process that will significantly affect them.
- not have significant decisions that will affect them taken solely by automated process.
- sue for compensation if they suffer damage by any contravention of the legislation.
- take action to rectify, block, erase or destroy inaccurate data.
- request that the Office of the Information Commissioner assess whether any provision of the Act has been contravened.

QCCA will only collect data relevant to the role of the individual, and process personal data in accordance with individuals' rights. In compliance with the right to erasure, QCCA will delete data under the following specific circumstances:

- Personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- An individual withdraws their consent.
- The individual objects to the processing and there is no overriding legitimate interest for continuing processing.
- The personal data was unlawfully processed.
- The personal data has to be erased to comply with a legal obligation.
- The personal data is processed in relation to online services to children.

If you feel that QCCA are not complying with Data Protection Legislation you have the right to lodge a complaint to the Information Commissioners Office (ICO). For full details of how to do this visit the ICO website ico.org.uk or call their helpline on [0303 123 1113](tel:03031231113).

7 – QCCA must put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data. All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties. QCCA will put in place appropriate measures for the deletion of personal data – manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically.

8 – QCCA must work to ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

9) Consent as a Basis For Processing

9.1 Although it is not always necessary to gain consent from individuals before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner. Consent is especially important when QCCA is processing any sensitive data, as defined by the legislation. QCCA understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement whilst being of a sound mind and without having any undue influence exerted upon them. Consent obtained on the basis of misleading information will not be a valid basis for processing. Consent cannot be inferred from the non-response to a communication.

9.2 QCCA will ensure that any forms used to gather data on an individual will contain a statement (fair collection statement) explaining the use of that data, how the data may be disclosed and also indicate whether or not the individual needs to consent to the processing.

9.3 QCCA will ensure that if the individual does not give their consent for the processing, and there is no other lawful basis on which to process the data, then steps will be taken to ensure that processing of that data does not take place.

10) Subject Access Rights

10.1 Individuals have a right to access any personal data relating to them which are held by QCCA. Any individual wishing to exercise this right should apply in writing to the Chief Executive Officer. Any member of staff receiving a SAR should forward this to the Chief Executive Officer. Under the terms of the legislation, any such requests must be complied within 40 days.

11) Disclosure of Data

11.1 Only disclosures which have been notified under QCCA's DP notification must be made and therefore staff and volunteers should exercise caution when asked to disclose personal data held on another individual or third party. QCCA undertakes not to disclose personal data to unauthorised third parties, including family members, friends, government bodies and in some circumstances, the police.

11.2 Legitimate disclosures may occur in the following instances:

- the individual has given their consent to the disclosure.
- the disclosure has been notified to the OIC and is in the legitimate interests of the organisation.
- the disclosure is required for the performance of a contract.

11.3 There are other instances when the legislation permits disclosure without the consent of the individual. For detailed guidance on disclosures a complete guide is available on the [ICO's website](#).

11.4 In no circumstances will QCCA sell any of its databases to a third party.

12) Publication of Information

12.1 QCCA publishes various items which will include some personal data, e.g.

- internal telephone directory.
- event information.
- photos and information in marketing materials.

12.2 It may be that in some circumstances an individual wishes their data processed for such reasons to be kept confidential or restricted to QCCA access only. Therefore, it is QCCA's policy to offer an opportunity to opt-out of any publication of such when collecting the information.

13) Soft opt-in

13.1 This allows QCCA to send marketing emails, SMS and direct messages without consent, subject to specific requirements being met, where such messages are about furthering their charitable purposes..

QCCA charity – as defined under the law in England, Scotland or Northern Ireland

The sole purpose of your direct marketing is to further one or more of your charitable purposes

QCCA obtained the contact details directly from the recipient

QCCA obtained the details in the course of the recipient expressing an interest in one or more of your charitable purposes OR offering or providing support to further one or more of your charitable purposes

QCCA gave a clear opportunity to refuse or opt out when you collected their details.

QCCA give a simple opportunity to refuse or opt out in every subsequent communication.

13.2 What are ‘charitable purposes’

The Charities Act 2011 and equivalent legislation in Scotland and Northern Ireland provides a non-exhaustive list of examples which can be considered charitable purposes, if done for the public benefit.

- Requesting donations, including financial contributions and donations of clothes, food or other items
- Requesting volunteers help
- Providing information about your charity’s mission-related activities, such as your programmes, projects and campaigns.

13.3 QCCA must make it simple for recipients to change their mind and opt out or unsubscribe from marketing. QCCA will make it for recipients to reply directly to our messages or to click a clear ‘unsubscribe’ link. With text messages QCCA will offer an opt-out by telling recipients to send a stop message to a code number. QCCA to must make this free of charge, apart from the other cost to people of sending the message.

14) Email

14.1 It is the policy of QCCA to ensure that senders and recipients of email are made aware that under the [Data Protection Impact Assessment](#) (DPIA), and [Freedom of Information Legislation](#) (FIL), the contents of email may have to be disclosed in response to a request for information. One means by which this will be communicated will be by a disclaimer on the QCCA’s email. Under the [Regulation of Investigatory Powers Act 2000](#), [Lawful Business Practice Regulations](#), any email sent to or from QCCA may be accessed by someone other than the recipient for system management and security purposes.

15) Recruitment & Selection

15.1 Information collected for recruitment or selection for an interview will only be used for that purpose only and must be kept securely. Where sensitive personal data is collected, explicit written consent should be obtained from applicants at the point of data collection.

15.2 If verifying the information a person provides, QCCA will ensure the person knows how this will be done and what information will be checked.

15.3 If QCCA needs to verify criminal conviction information, it will only do this by getting a Disclosure and Barring Service (DBS) check. QCCA will ensure it is entitled to receive this information and must follow the DBS’s procedures strictly. QCCA may only keep a record that a satisfactory/unsatisfactory check was made, but it may not store any detailed information.

16) Employment Records

16.1 QCCA is permitted to collect, maintain and use employment records. However, staff should know what information about them is kept and what it will be used for. QCCA will not keep information for which it has no genuine business need or legal duty to keep.

16.2 Employment records must be kept in a secure, locked place, and computerised records must be password protected. Only authorised staff should have access to employment records (usually, the individual's Line Manager, Finance Manager and the Chief Executive Officer).

16.3 QCCA will keep employment records of staff who have left for three years to allow for information to be supplied for references. After this time, records will be destroyed.

17) Guidance to Staff

17.1 QCCA employees should bear in mind the following considerations:

1 –Sensitive and confidential information must be treated with particular attention.

2 –Personal data must not be emailed to staff members' personal email accounts, as there is no guarantee of security of these accounts.

3 –Any personal data stored in paper format must be held securely locked in filing cupboards in QCCA's offices. If it has to leave the office, consider pseudonymisation.

4 –All QCCA's personal computers and laptops must be password protected. All personal data should be kept in the appropriate IT system (i.e. staff details in Sharepoint). If electronic equipment is lost or stolen, access to the server and database from that piece of equipment will be severed.

5 –The database holding service users' personal data must be accessed only via QCCA's electronic equipment. All employees and volunteers will be trained on how to use the database relying on the written procedures for entering, amending and maintaining data. These procedures will be reviewed annually.

6 –Any changes to personal data (e.g. a change in home address) must be updated on the relevant database within 28 days of receipt.

7 –Personal data must not be given out to any third party unless the individual has agreed to release this information.

8 –Any personal data kept in paper format that is no longer required must be appropriately destroyed.

9 –Any personal data kept electronically that is no longer required must be deleted. QCCA will carry out data minimisation as part of the annual data audit.

10 –If data needs to be processed for profiling or for other statistical information, pseudonymise it.

18) Procedure For Review

18.1 This policy will be updated as necessary to reflect best practice or future amendments made to the General Data Protection Regulation (GDPR) May 2018 and Data Protection Act 1998. Please visit [the ICO's website](#) which provides further detailed guidance on a range of topics including individuals' rights, exemptions from the Act, dealing with subject access requests, how to handle requests from third parties for personal data to be disclosed etc.

18.2 In particular, you may find it helpful to read the [Guide to Data Protection](#). For help or advice on any data protection or freedom of information issues, please do not hesitate to contact our Data Protection Officer (DPO) and Chief Executive Officer, Foyezur Miah: foyezur@qcca.org.uk

Approved by the QCCA Management.

Signed A. Ahmed Date 30 April 2026

Next review date...30th April 2027.....