Data Protection Policy

Introduction and Scope

This policy explains how Necessary Furniture protects personal data and complies with the UK General Data Protection Regulation, the Data Protection Act and other applicable data protection legislation. It applies to trustees, employees, volunteers, contractors and anyone else who processes personal data on behalf of the charity. It covers information relating to beneficiaries and service users, donors, supporters, volunteers, employees, job applicants, customers, suppliers, partners and other individuals who engage with Necessary Furniture.

Data Protection Lead

The Board of Trustees is accountable for ensuring that Necessary Furniture complies with its data protection obligations. The Board will appoint a Data Protection Lead to oversee day-to-day compliance, maintain relevant records, advise colleagues, coordinate responses to individual rights requests and lead the investigation and reporting of personal data breaches. All trustees, employees and volunteers must complete appropriate induction and refresher training, follow this policy and promptly report concerns or suspected breaches to the Data Protection Lead.

Everyone handling personal data for Necessary Furniture must only access information needed for their role; use approved systems and storage locations; keep passwords and access credentials secure; check recipients before sending information; avoid discussing confidential matters where they may be overheard; securely dispose of paper and electronic records; and immediately report any loss, misdirection, unauthorised access or suspected breach to the Data Protection Lead.

Data Protection

Data protection is the practice of safeguarding personal information by applying the data protection principles and complying with the UK GDPR, the Data Protection Act and other applicable data protection legislation. The Information Commissioner's Office (ICO) regulates data protection in the UK and publishes guidance that Necessary Furniture follows.

UK GDPR: The UK General Data Protection Regulation, which outlines the rules for processing personal data in the UK.
Data Processor: An individual or organisation that processes personal data on behalf of a data controller.
Data Controller: An individual or organisation that determines how and why personal data is processed.
Data Subject: An individual whose personal data is being processed.
Processing: Any operation performed on personal data, including collection, storage, use, and disclosure.
Personal Data: Any information that can identify a living individual, such as name, address, or email address.
Special Category Data: Personal data requiring additional protection under data protection law, including information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric identification data, health, sex life or sexual orientation.
Direct Marketing: Any communication aimed at promoting a product or service directly to an individual.
PECR: The Privacy and Electronic Communications Regulations, which govern electronic direct marketing.
Valid Consent: Consent that is freely given, specific, informed and unambiguous, indicated by a clear affirmative action and capable of being withdrawn at any time.
Legitimate Interests: A lawful basis that may permit Necessary Furniture to process personal data where the processing is necessary for a legitimate interest pursued by the charity or a third party, provided that the individual's interests, rights and freedoms do not override that interest. Where this basis is used, the charity will document its assessment.

Data Protection Principles

Data is:

- **Processed lawfully, fairly and in a transparent manner.**
    - There are several grounds on which data may be collected, including consent.
    - We are clear that our collection of data is legitimate and we have obtained consent to hold an individual's data, where appropriate.
    - We are open and honest about how and why we collect data and individuals have a right to access their data.

- **Collected for specified, explicit and legitimate purposes and not used for any other purpose.**
    - We are clear on what data we will collect and the purpose for which it will be used.
    - And only collect data that we need.
    - When data is collected for a specific purpose, it may not be used for any other purpose, without the consent of the person whose data it is.
- **Adequate, relevant and limited to what is necessary.**
    - We collect only the data we need to get the job done.
- **Accurate and, where necessary, kept up to date.**
    - We ensure the data we collect is accurate and have processes and/or checks to ensure that data which needs remains up to date, such as beneficiary, staff or volunteer records.
    - We correct any mistakes promptly.
- **Kept for no longer than is necessary**. We understand what data we need to retain, for how long and why.
    - We only hold data only for as long as we need to.
    - That includes both hard copy and electronic data.
    - Some data must be kept for specific periods of time (e.g. accounting, H&S at Work).
    - Necessary Furniture maintains a retention schedule and a regular review process to ensure that paper and electronic records are securely destroyed or deleted when they are no longer required.
- **Processed to ensure** appropriate security, not only to protect against unlawful use, but also loss or damage. We follow the ICO guidance on data storage, sharing and security.
    - **Data is held securely**, so that it can only be accessed by those who need to do so. For example, paper documents are locked away, access to online folders in shared drives is restricted to those who need it, IT systems are password protected, and/or sensitive documents that may be shared (e.g. payroll) are password protected.
    - **Data is kept safe.** Our IT systems have adequate anti-virus and firewall protection that's up to date. Staff understand what they must and must not do to safeguard against cyber-attack, and that passwords must be strong and not written down or shared.
    - **Data is recoverable.** We have adequate data back-up and disaster recovery processes.

Privacy Notices

A privacy notice tells people what you do with their personal data and is a key part of being open and transparent. We provide clear, simple and accessible privacy notices whenever we collect personal data, for example on forms, websites or sign-up processes. These explain what data we collect, why we need it, how we use it, who we share it with, how long we keep it, and the rights individuals have. We make sure our privacy information is easy to understand and keep it up to date.

Individual Rights

We recognise individuals' rights under data protection law, including the rights to be informed, to access personal data, to have inaccurate data corrected, to request erasure or restriction of processing, to data portability, to object to processing and, where applicable, to safeguards relating to automated decision-making. These rights are not absolute and will be considered in accordance with the circumstances and applicable law.

Use of Imagery/Video

Photographs, video and audio recordings may contain personal data and may also be protected by copyright. Necessary Furniture will identify the purpose and lawful basis before creating or using a recording, provide clear information about how it will be used and obtain consent where consent is the appropriate lawful basis. Particular care will be taken where recordings involve children, adults at risk or sensitive circumstances. Recordings will only be retained for as long as necessary, stored securely and used consistently with the information provided when they were collected.

Recording Devices

Smart glasses, wearable devices, mobile phones, or any other device that can take photos, record video, record sound, or create AI transcripts may only be used if:

- Those present have given their informed consent and;
- The purpose, storage and retention of recordings meet fully the charity's data protection requirements.

Such devices must not be used:

- During safeguarding, casework, counselling, health, financial, HR or other confidential activities except where expressly authorised.

- To record children or vulnerable adults.

Data Breach

A breach is more than only losing personal data. It is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Any actual or suspected personal data breach must be reported immediately to the Data Protection Lead. Necessary Furniture will record the incident, contain it where possible, investigate what happened, assess the risks to affected individuals and decide whether notification is required. Where a breach is likely to result in a risk to individuals' rights and freedoms, the charity will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it. Where the risk is high, affected individuals will also be informed without undue delay. Lessons learned and corrective actions will be documented and monitored.
A breach may cause discrimination, reputational damage, financial loss, loss of confidentiality or another significant economic or social disadvantage.

- Result in discrimination.
- Damage to reputation.
- Financial loss.
- Loss of confidentiality or any other significant economic or social disadvantage.

Complaints

We will:

- Provide a clear and accessible way for individuals to submit data protection complaints.
- Acknowledge receipt of such complaints within 30 calendar days.
- Take appropriate steps to investigate the complaint without undue delay, including making necessary enquiries and keeping the complainant informed throughout.
- Communicate the outcome of the complaint promptly and clearly, explaining any actions taken or decisions made.

All complaints will be handled fairly, transparently, and in accordance with our obligations under the Data Protection Act. If the complainant remains dissatisfied, they may escalate the matter to the Information Commissioner's Office (ICO).

Fundraising

We will ensure that our fundraising complies with the Data Protection Act and ICO guidelines and also the Fundraising Regulator guidelines including, if applicable, direct marketing and PECR. We will respect the privacy and contact preferences of our donors.

The ICO's "charitable purpose soft opt-in" allows us to send fundraising emails, texts, and similar messages without explicit consent, but only in tightly defined circumstances. In practice, we can rely on it where someone has actively engaged with our charity – for example by donating, volunteering, or expressing clear interest in our work – and we collected their contact details directly at that point. The communication must be solely about our own charitable purposes (such as fundraising appeals, campaigns, or volunteering), and not about other organisations or commercial activity.

To use this lawfully and safely, we will build compliance into how we collect and use data. We will give individuals a clear and simple opportunity to opt out when we first collect their details, and we will repeat that opt-out option in every message we send. We will not use contact details obtained from third parties, including fundraising platforms or purchased lists. In practice, this means we may need to operate parallel approaches: consent-based marketing for older contacts and soft opt-in for new supporters, while ensuring we do not stretch what constitutes genuine "supporter interest" or risk breaching PECR.

Fundraising Preference Service

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

Artificial Intelligence

If AI has access to data sets containing personal information, such as staff or beneficiary records, we will carry out an AI Risk Analysis and a data protection impact

assessment (DPIA) and update our data protection policy and procedures to reflect this.

Data Retention

Necessary Furniture will retain personal data only for as long as it is needed for the purpose for which it was collected, to meet legal or regulatory requirements, or to establish, exercise or defend legal claims. Retention periods will be recorded in an approved retention schedule covering both paper and electronic records. When information reaches the end of its retention period, it will be securely deleted, destroyed or anonymised unless there is a documented reason to retain it for longer.

Subject Access Requests

A Subject Access Request (SAR) is when someone asks to see the personal data you hold about them. We make this as easy as possible for people and will respond within one month, as required by law. We check the identity of the person making the request, gather the relevant information, and provide it clearly and securely. If a request is complex, we may extend the deadline in line with ICO rules and will explain this to the individual.

Data Sharing

Necessary Furniture will only share personal data where there is a clear lawful reason, including where sharing is necessary to deliver services, safeguard an individual, comply with a legal obligation or work effectively with an authorised partner. Before sharing information, we will confirm that the disclosure is necessary and proportionate, identify the lawful basis, limit the information to what is required and use a secure method. Where another organisation processes data on our behalf or the parties share responsibility for deciding how data is used, an appropriate written agreement will define each party's responsibilities, security requirements, retention arrangements and procedures for handling rights requests and breaches.

Third Party Processors

Sometimes we may use external organisations (such as IT providers, CRM systems, or payroll services) to process data on our behalf. We make sure these organisations only act on our instructions and have appropriate contracts in place to protect

personal data. We also carry out basic checks to ensure they have suitable security and data protection standards.

Necessary Furniture will identify and document an appropriate lawful basis before processing personal data. Where special category data is processed, the charity will also identify an applicable condition under data protection law. Consent will only be relied upon where it is freely given, specific, informed and unambiguous, and where it can be withdrawn as easily as it was given. The charity's record of processing activities will document the relevant purposes, categories of information, lawful bases, recipients, retention arrangements and security measures.

Records of Processing Activities (ROPA)

We keep clear records of what personal data we hold, where it comes from, how it is used, and who it is shared with. This helps us stay organised, demonstrate compliance, and respond quickly to requests or issues. For smaller charities this may be a simple record, but it must still show how data is used and why.

Additional Provisions

The following provisions form part of this policy where they are relevant to Necessary Furniture's activities. They should be read alongside the charity's safeguarding, complaints, information security, acceptable use, records retention, fundraising and photography or media procedures.

Supporting People to Understand and Exercise Their Rights

Necessary Furniture may process information about individuals who are vulnerable or who may require support to understand how their information is used. Privacy information and consent requests will be provided in a clear and accessible form appropriate to the individual's needs. Where a person cannot make a particular decision, the charity will establish whether another person has lawful authority to act on their behalf and will record the basis for any decision. Information may also be shared without consent where this is necessary and lawful to safeguard an individual.

Version Control - Approval and Review

The Board of Trustees will approve this policy and review it annually, or sooner following a significant data protection incident, a material change to Necessary Furniture's activities, systems or partnerships, or a change in legislation or regulatory guidance. The Data Protection Lead will coordinate the review and maintain the version-control record.

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	19/10/2026	Initial Policy	Annually