

Data Protection Policy

<i>Version</i>	<i>Document Author</i>	<i>Version Completion Date</i>
1	Tim Smith, Facilities Coordinator	21/3/18

Approval

<i>Approver</i>	<i>Name/Role/Board</i>	<i>Date approved</i>
Business Owner	Kate Morris, Director of Finance and Resources	21/3/18
Policy approval board	ELT	28/3/18
Policy ratification board	Council	27/3/18

Version History

<i>Date of First Issue</i>	<i>Date of Last Revision</i>	<i>Date of Next Review</i>
N/A	N/A	31/3/20

Contents

1. Introduction	4
1.1 Background.....	4
1.2 Data protection principles and accountability principle	4
1.3 Privacy	4
1.4 Scope	5
1.5 Controllers and processors	5
2. Data covered by the GDPR	5
2.2 Special category data	6
2.3 Children’s data.....	6
2.4 Criminal offence data	6
3. Lawful processing	6
3.1 Consent.....	7
3.2 Contract.....	8
3.3 Legal obligation.....	8
3.4 Vital interests.....	8
3.5 Public task.....	8
3.6 Legitimate interests	9
3.7 Lawful basis for special category data	9
3.8 Lawful Basis for criminal offence data	10
4. Individual rights	10
4.1 Right to be informed.....	11
4.2 Right of access	11
4.3 Right to rectification.....	12
4.4 Right to erasure	12
4.5 Right to restrict processing.....	13
4.6 Right to data portability	13
4.7 Right to object.....	13
4.8 Rights related to automated decision making including profiling	14
5. Accountability and governance	14
5.1 Accountability, governance and transparency	14
5.2 Roles and responsibilities	15
5.3 Data protection by design and default.....	16

6. Contracts.....	16
7. Documentation.....	17
8.1 Definition of a personal data breach.....	18
8.2 Managing a breach.....	18
8.3 Reporting a breach to a supervisory authority	18
8.4 Informing individuals of a breach	19
8.5 Processors.....	19

1. Introduction

1.1 Background

Volunteering Matters needs to collect personal data about people we deal with in order to carry out our business and provide services. Data is held about service users, volunteers and employees (present, past and prospective), suppliers and other business contacts. We ensure that this data is processed lawfully, securely and correctly in compliance with the General Data Protection Regulation (GDPR). This policy applies to both automated personal data and to manual filing systems.

1.2 Data protection principles and accountability principle

We fully support and comply with the data protection principles and the accountability principle in the GDPR which are set out below:

- **Lawfulness, fairness and transparency:** personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
- **Purpose limitation:** personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- **Data minimisation:** personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- **Accuracy:** personal data shall be accurate and, where necessary, kept up to date
- **Storage limitation:** personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- **Integrity and confidentiality:** personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- **Accountability principle:** We will demonstrate that we comply with the data protection principles.

1.3 Privacy

Volunteering Matters has a privacy policy which comprises privacy notices for all the activities in which we engage.

Our privacy notices will always include:

- Details of the legal basis on which the data is being processed.
- Details of individuals' rights, in particular their right to object which will be presented clearly and separately from any other information.
- The source of the personal data.

We will provide separate privacy notices for children and the person holding 'parental responsibility'. We will write age-appropriate privacy notices for children.

Where appropriate we will use data protection impact assessments to ensure compliance with our data protection obligations and to meet individuals' expectations of privacy.

Where possible we will use data protection impact assessments as an integral part of taking a privacy by design approach.

1.4 Scope

The following are within the scope of this document: -

- All Volunteering Matters staff (including interns)
- All staff working on behalf of Volunteering Matters, including contractors, temporary staff and secondees.
- All Volunteering Matters volunteers
- All Volunteering Matters service users

1.5 Controllers and processors

The GDPR applies to 'controllers' and 'processors'. In procuring suppliers Volunteering Matters will act as controller and any suppliers will act as a processor within the meaning of the GDPR where:

- A controller determines the purposes and means of processing personal data
- A processor is responsible for processing personal data on behalf of a controller.

Volunteering Matters will ensure that it meets all requirements as a controller and that suppliers meet all requirements as processors.

2. Data covered by the GDPR

2.1 Personal data

Volunteering Matters will manage personal data in line with the GDPR where 'personal data' means any information relating to an identifiable person who can be directly or indirectly identified, including names, addresses, email addresses, dates of birth and other private and confidential or sensitive information and other data which could identify individuals. The policy covers both automated personal data and to manual filing systems

Personal data will be lawfully processed on one of the six bases in the GDPR (see 3.1).

2.2 Special category data

Special category data is personal data which the GDPR says is more sensitive and so needs more protection. It includes but is not limited to: race, ethnicity, political views; religious views; trade union membership, genetics, biometrics (where used for ID purposes), health, sex life and sexual orientation.

Special category data will be lawfully processed on one of the six bases in the GDPR (see 3.1) and one of ten additional bases (see 3.7).

2.3 Children's data

Volunteering Matters will exercise its enhanced duty of care in working with children and processing their personal data as set out in the GDPR. In particular where services are offered directly to a child, we will ensure that the information we hold about them is written in a clear, plain way that a child will understand so that they are able to understand what will happen to their personal data, and what rights they have.

2.4 Criminal offence data

Volunteering Matters will not usually process personal data about criminal convictions. Where processing is necessary a lawful basis will be identified and documented. (see 3.8.)

3. Lawful processing

Volunteering Matters will always establish and document a lawful basis for processing personal data before proceeding. The bases available are: consent, contract, legal obligation, vital interests, public task and legitimate interests. (see 3.1 to 3.6.)

Volunteering Matters will not change to a different lawful basis at a later date without good reason and will comply with the GDPR if a change is required. Any such changes will be fully documented.

Some lawful bases require that processing data is 'necessary'. Volunteering Matters will not process data where it can reasonably achieve the same purpose without processing the data

To ensure that Volunteering Matters lawfully processes data concerning special categories or children or criminal offences, the following will apply:

- Special categories: To process special category data Volunteering Matters will firstly identify a lawful basis for processing personal data (see 2.1) and then identify one of a further ten bases relating to processing special category data is satisfied (see 3.8). The choice of one basis will not determine the choice of the other.
- Children: Personal data concerning children will always be processed on one of the bases set out in 3.2 to 3.7 below. When consent is the basis for processing Volunteering Matters will ensure that necessary consent is sought from whoever holds parental responsibility where the age of the child makes this necessary. (see 3.2).

Criminal offences: Volunteering Matters will not process personal data about criminal convictions or offences without either legal authority or official authority. Where processing is necessary a lawful basis will be identified and documented. (see 3.9).

3.1 Consent

The data subject has given consent to the processing of his or her personal data for one or more specific purposes. If consent is difficult or impossible to obtain Volunteering Matters will process the personal data on an alternative legal basis. Where consent is given it will specifically cover the controller's name, the purposes of the processing and the types of processing activity involved A and we will explain why we want the data and what we will do with it.

In obtaining and managing consent Volunteering Matters will:

- Ensure that consent is freely and unambiguously given.
- Actively ask people to opt in. Pre-ticked boxes, opt-out boxes or other default settings will not be used.
- Regularly review its consent practices and existing consents and refresh them if they don't meet the GDPR standard.
- Keep clear records to demonstrate when consent has been obtained and will get separate consent for separate things.
- Will make it easy for people to withdraw consent and offer them easy ways to withdraw consent at any time.
- Keep consent requests separate from other terms and conditions.
- Name any third party controllers who will rely on the consent.

In obtaining and managing consent involving children Volunteering Matters will:

- Seek consent in cases from a person holding 'parental responsibility' where the age of the child makes it a legal requirement.

3.2 Contract

Volunteering Matters will use a contract as a legal basis for processing personal data in limited circumstances. Where we do so our reasoning will be documented.

The following will apply:

- Where there is a contract with an individual we will use the contract basis for processing personal data where we need to do so to comply with our obligations under the contract.
- Where there is no contract with an individual, but they have asked us to do something as a first step towards one (e.g. provide a quote) we will use the contract basis for processing personal data
- If the processing is necessary for a contract with the individual, we will not seek separate consent.
- If processing of special category data is necessary for the contract, we will identify a separate condition for processing this data. (see 3.7).
- If the contract is with a child under 18, we will consider whether they have the necessary competence to enter into a contract. If they do not, we will identify an alternative basis on which to process their personal data.

3.3 Legal obligation

Volunteering Matters will use this lawful basis to process personal data to comply with a common law or statutory obligation. In using it we will identify the specific legal provision or an appropriate source of advice or guidance that sets out the obligation. The basis will be documented. It will not be used with regard to contractual obligations.

3.4 Vital interests

This basis will apply if it is necessary to process personal data to protect someone's life. It is not available if the individual is capable of giving consent, even if they refuse their consent. Volunteering Matters is unlikely to use this basis process personal data, but if it is necessary the GDPR and up to date guidance from the ICO will be strictly adhered to.

3.5 Public task

This basis is most relevant to public authorities, but it can apply to any organisation that exercises official authority or carries out tasks in the public interest. Volunteering Matters is unlikely to use this basis process personal data, but if it is necessary the GDPR and up to date guidance from the ICO will be strictly adhered to.

3.6 Legitimate interests

Volunteering Matters will consider processing the personal data of an individual on the basis of our legitimate interests or those of a third party. Before proceeding we will balance our interests against the individual's. If their interests are likely to override our legitimate interests, processing will not take place on this basis.

The following will apply:

- We will consider legitimate interests for processing children's data, but we will take extra care to ensure their interests are protected.
- We will consider using legitimate interests in order to lawfully disclose personal data to a third party, after having regard to why they want the information, whether they actually need it, and what they will do with it. We will ensure that the disclosure is justified.
- Before using legitimate interests, we will use a three-part test to assess whether it applies, known as a legitimate interests assessment (LIA), comprising a **purpose test, a necessity test and a balancing test**. It will be conducted in line with best practice guidance from the ICO.
- We will record all LIAs and their outcomes. They will be reviewed and if there is a significant change in the purpose, nature or context of the processing.
- We will always stop using legitimate interests when the right to objects is exercised (see section 4.7).

3.7 Lawful basis for special category data

Special category data is personal data which the GDPR says is more sensitive and so needs more protection. It includes but is not limited to: race, ethnicity, political views; religious views; trade union membership, genetics, biometrics (where used for ID purposes), health, sex life and sexual orientation.

Special category data will be lawfully processed on one of the six bases in the GDPR (see section 3.1) and one of the ten additional bases set out below:

- (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes;

- (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Data Protection Officer (see section 4.1) or of the data subject in the field of employment and social security and social protection law;
- (c) processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- (d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
- (e) processing relates to personal data which are manifestly made public by the data subject;
- (f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- (g) On the basis of law processing is necessary for reasons of substantial public interest. Processing shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;
- (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of law;
- (i) processing is necessary for reasons of public interest in the area of public health;
- (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

3.8 Lawful Basis for criminal offence data

Volunteering Matters will not usually process personal data about criminal convictions. Where processing is necessary a lawful basis will be identified and documented and in any event will not process this type of data unless we are given official authority to do so because we are processing it in an official capacity.

4. Individual rights

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure

5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Volunteering Matters' policy position for each is set out below.

4.1 Right to be informed

Under the right to be informed Volunteering Matters will provide 'fair processing information' through a privacy notice.

The information we supply about the processing of personal data will be concise, transparent, intelligible and easily accessible; It will be written in clear and plain language, particularly if addressed to a child and it will be free of charge.

The table in the appendix sets out the information we will supply to individuals and at what stage we will do this.

4.2 Right of access

Volunteering Matters will give individuals access to their personal data and supplementary information to allow individuals to be aware of and verify the lawfulness of the data processing.

Individuals will have the right to obtain the following information.

- Confirmation that their data is being processed;
- Access to their personal data
- Other supplementary information which will be set out in the privacy notice

The following will apply:

- We will provide the information free of charge although we may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive or further copies of the same information are requested. The fee will be based on the administrative cost of providing the information.
- Information will usually be provided within one month but in the case of a complex request this period may be extended to three months.
- Where we refuse to respond to a request, we will explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy. We will do this within one month.

- Where the request is made electronically, we will provide the information in a commonly used electronic format.

4.3 Right to rectification

Volunteering Matters will normally rectify any personal data if it is inaccurate or incomplete, usually within one month, but within three months where the request for rectification is complex.

Where we decide not to take action in response to a request for rectification we will explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy.

If we have disclosed the personal data in question to others, we will contact each recipient and inform them of the rectification - unless this proves impossible or involves disproportionate effort. If asked to, we will inform the individuals about these recipients.

4.4 Right to erasure

The right to erasure is also known as 'the right to be forgotten', but it does not provide an absolute 'right to be forgotten'.

Volunteering Matters will erase personal data and stop processing it in the following circumstances, taking additional care with any requests received from children:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the individual withdraws consent.
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- The personal data was unlawfully processed, in breach of the GDPR.
- The personal data has to be erased in order to comply with a legal obligation.
- The personal data is processed in relation to the offer of information society services to a child.

We may refuse to comply with a request for erasure where the personal data is processed for the following reasons:

- To exercise the right of freedom of expression and information.
- To comply with a legal obligation for the performance of a public interest task or exercise of official authority.
- For public health purposes in the public interest; archiving purposes in the public interest, scientific research historical research or statistical purposes
- The exercise or defence of legal claims.

If we have disclosed the personal data in question to others, we will contact each recipient and inform them of the erasure - unless this proves impossible or involves disproportionate effort. If asked to, we will inform the individuals about these recipients.

4.5 Right to restrict processing

Volunteering Matters will restrict the processing of personal data and retain just enough information about the individual to ensure that the restriction is respected in future.

The processing of personal data will be restricted in the following circumstances:

- Where an individual contests the accuracy of the personal data we will restrict the processing until we have verified the accuracy of the personal data.
- Where an individual has objected to the processing where it was necessary for the performance of a public interest task or purpose of legitimate interests and we are considering whether our legitimate grounds override those of the individual.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If we no longer need the personal data but the individual requires the data to establish, exercise or defend a legal claim.

If we have disclosed the personal data in question to others, we will contact each recipient and inform them of the restriction on processing - unless this proves impossible or involves disproportionate effort. If asked to, we will inform the individuals about these recipients.

When processing is restricted we will store the personal data, but not further process it. We will inform individuals when we decide to lift any restrictions on processing.

4.6 Right to data portability

Volunteering Matters is unlikely to receive requests under the right to data portability because the right applies only when all of the following are in place:

- To personal data an individual has provided to a controller
- Where the processing is based on the individual's consent or for the performance of a contract.
- When processing is carried out by automated means.

We will process any requests in accordance with the GDPR and ICO best practice.

4.7 Right to object

Volunteering Matters will consider objections to the processing of personal data in the following areas: -

- Processing based on legitimate interests or the performance of a task in the public interest or exercise of official authority.
- Direct marketing
- Scientific or historical research and statistics.

Legitimate interests: to comply with the right to object when we process personal data for the performance of a legal task or our legitimate interests, we will stop processing the personal data unless one of the following applies:

- We can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
- The processing is for the establishment, exercise or defence of legal claims.

Direct marketing: to comply with the right to object if we process personal data for direct marketing purposes we will stop processing personal data for direct marketing purposes as soon as we receive an objection

Research: We will not comply with the right to object if we are conducting research where the processing of personal data is necessary for the performance of a public interest task

If any of the processing activities fall into any of the above categories and are carried out online, we will offer a way for individuals to object online.

4.8 Rights related to automated decision making including profiling

Volunteering Matters does not make decisions solely by automated means without any human involvement or engage in profiling, the automated processing of personal data to evaluate certain things about an individual.

We therefore do not anticipate that this right will be exercised when we process personal data. If, for any reason, it is exercised our response will be consistent with the requirements of the GDPR and best practice published by the ICO.

5. Accountability and governance

5.1 Accountability, governance and transparency

With the aim of minimising the risk of breaches and upholding the protection of personal data and to ensure compliance with the data protection principles and the accountability principle of the GDPR set out in 1.2, Volunteering Matters will keep in place measures to demonstrate accountability, governance and transparency.

We will:

- Ensure that our internal data protection policies (e.g. staff training, internal audits of processing activities, and reviews of internal HR policies) are up to date and reviewed regularly.
- Monitor compliance with the GDPR and our policies and procedures and follow the ICO's guidance on best practice.
- Maintain accurate and up to date documentation of our data processing activities (see 7).
- Implement measures that meet the principles of data protection by design and data protection by default (see 5.3).
- Use data protection impact assessments where appropriate (see 1.3).

Volunteering Matters is not required to appoint a Data Protection Officer under the GDPR. The person currently responsible for data protection at Volunteering Matters is the Director of Finance and Resources who will ensure that Volunteering Matters has sufficient staff and skills to discharge our obligations under the GDPR including:-

- Informing and advising Volunteering Matters, its employees and volunteers about their obligations to comply with the GDPR and other data protection laws.
- Monitoring compliance with the GDPR and other data protection laws.
- Being the first point of contact for supervisory authorities.
- Ensuring that policies and procedures are reviewed as necessary in line with best practice.

5.2 Roles and responsibilities

Volunteering Matters will:-

- ensure that the officer with overall responsibility for data protection reports to Trustees. This is currently the Director of Finance and Resources.
- provide training for all staff members who handle personal information and ensure access to further guidance and support
- provide clear lines of report and supervision for compliance with data protection
- carry out regular checks to monitor and assess new processing of personal data and to ensure notification to the Information Commissioner is updated to take account of any changes in processing of personal data
- develop and maintain procedures to include: roles and responsibilities, notification, subject access, training and compliance testing.

All employees and volunteers will, through appropriate training and responsible management process personal data appropriately, including but not limited to the following:

- Adhere to all forms of guidance, codes of practice and procedures about the collection and processing of personal data, including this policy and in particular the principles of the GDPR in 1.2 of this policy.
- Understand the purposes for which the Volunteering Matters uses personal data

- Collect and process appropriate personal data in accordance with the purposes for which it is to be used by Volunteering Matters to meet its service needs or legal requirements.
- Ensure that personal data is stored securely
- Ensure the personal data is destroyed appropriately when it is no longer required
- Understand that breaches of this policy may result in disciplinary action, up to and including dismissal

5.3 Data protection by design and default

Volunteering Matters will implement technical and organisational measures to show that we have considered and integrated data protection into our data processing activities.

6. Contracts

Whenever we use a data processor we will have a written contract in place which will incorporate what is required by the GDPR and enable us to demonstrate our compliance with the GDPR. Data processors will include but not be limited to Raiser's Edge, ADP and Crown Management.

We will only appoint processors who can provide sufficient guarantees that the requirements of the GDPR will be met and the rights of data subjects protected.

Contracts will set out the subject matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subject, and the obligations and rights of the controller. As a minimum, contracts will include the following terms, requiring the processor to:

- only act on the written instructions of the controller
 - ensure that people processing the data are subject to a duty of confidence
 - take appropriate measures to ensure the security of processing
 - only engage sub-processors with the prior consent of the controller and under a written contract
 - assist the controller in providing subject access and allowing data subjects to exercise their rights under the GDPR
 - assist the controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments
 - delete or return all personal data to the controller as requested at the end of the contract
- submit to audits and inspections, provide Volunteering Matters with whatever information we need to ensure that we are complying with the GDPR

7. Documentation

Volunteering Matters will maintain up to date documentation which reflect our processing activities including processing purposes, data sharing and retention. Records will be kept in writing and wherever possible electronically and made available to the ICO on request.

We will require data processors to keep documentation in accordance with GDPR.

We will document processing activities that:

- are not occasional; or
- could result in a risk to the rights and freedoms of individuals; or
- involve the processing of special categories of data or criminal conviction and offence data.

To comply with GDPR we will document the following information:

- The name and contact details of our organisation.
- The purposes of our processing.
- A description of the categories of individuals and categories of personal data.
- The categories of recipients of personal data.
- Retention schedules, including but not be limited to Raiser's Edge, ADP and Crown Management.
- A description of our technical and organisational security measures.

In line with best practice and to document other aspects of your compliance with the GDPR, we will document the following information:

- information required for privacy notices, such as:
 - the lawful basis for the processing
 - the legitimate interests for the processing
 - individuals' rights
 - the existence of automated decision-making, including profiling
 - the source of the personal data;
- records of consent;
- controller-processor contracts;
- the location of personal data;
- Data Protection Impact Assessment reports;
- records of personal data breaches;
- information required for processing special category data or criminal conviction and offence data under the Data Protection Bill, covering:
 - the condition for processing in the Data Protection Bill
 - the lawful basis for the processing in the GDPR
 - your retention and erasure policy document.

8. Personal data breaches

8.1 Definition of a personal data breach

A personal data breach is a security incident that has affected the confidentiality, integrity or availability of personal data as a result of either accidental or deliberate causes. Volunteering Matters will treat the following as personal data breaches:

- The loss, destruction, corruption or disclosure of any personal data
- Accessing data or passing it on without proper authorisation
- Data which is made unavailable where this unavailability has a significant negative effect on individuals.

8.2 Managing a breach

The following will apply:

- We will have robust breach detection, investigation and internal reporting procedures in place which will enable us to decide whether to notify the relevant supervisory authorities and the affected individuals.
- We will also notify third parties as necessary such as the police, insurers, professional bodies, or bank or credit card companies.
- We will ensure that all breaches are recorded, whether or not they need to be reported to the ICO.
- Document the facts relating to the breach, its effects and the remedial action taken in order to comply with the accountability principle.
- We will investigate whether or not the breach was a result of human error or a systemic issue to identify how a recurrence can be prevented
- We keep a record of all personal data breaches.

8.3 Reporting a breach to a supervisory authority

The following will apply:

- When a personal data breach has occurred, we will establish the likelihood and severity of the resulting risk to people's rights and freedoms. If it's likely that there will be a risk we will notify the ICO and document the reasons for this decision.
- When we become of a breach we will prioritise the investigation and give it adequate resources.
- When we notify the ICO we will do so within 72 hours of becoming aware of the breach and provide the following:
 - a description of the nature of the personal data breach including, where possible:
 - the categories and approximate number of individuals concerned; and
 - the categories and approximate number of personal data records concerned;
 - the name and contact details of the data protection officer (if your organisation has one) or other contact point where more information can be obtained;
 - a description of the likely consequences of the personal data breach; and
 - a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

- If an initial notification to the ICO takes longer than 72 hours, we will give reasons for the delay.
- If we cannot provide full details within 72 hours, we will explain the delay to the ICO and set out when we will provide more information.
- If we decide we don't need to report the breach, we will document the reasons for this decision.

8.4 Informing individuals of a breach

The following will apply:

- If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will inform individuals of the breach.
- The threshold for informing individuals is higher than for notifying the ICO and if we decide not to notify individuals, we will still notify the ICO
- The decision-making process will be documented in line with the requirements of the accountability principle.
- The information we provide to individuals when telling them about a breach will be in clear and plain language and will include:
 - The name and contact details of a senior manager at Volunteering Matters where more information can be obtained
 - A description of the likely consequences of the personal data breach
 - A description of the measures taken, or proposed to be taken, to deal with the personal data breach.

8.5 Processors

When Volunteering Matters uses a processor, the requirements on breach reporting will be detailed in the contract between us and the processor.