

Purpose of this Statement	To detail the Data Protection Policy at Bradford North Foodbank
Dated	November 2025
Designated Contact	Foodbank Manager

Introduction

Bradford North Foodbank is registered with the Information Commissioner as a controller [ZA132799] and is governed by the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations 2003 (PECR).

We work in partnership with Trussell (Charity no. 1110522) as part of their national foodbank network, which means we share data of legitimate interest with them as part of standard foodbank operations.

Who this policy applies to

Bradford North Foodbank employees, volunteers, trustees and contractors are required to adhere to this policy which is designed to protect the personal data of data subjects – our beneficiaries, supporters, volunteers, employees and trustees.

Written data protection guidance is provided to help staff and volunteers comply with this policy and relevant data protection legislation in Appendix 1.

Key definitions

Data protection law applies to how we process people's personal information. The key terms that we need to understand are:

Controller – Bradford North Foodbank is a controller as it collects and decides how personal information will be used.

Principles – These are the rules that we must follow when processing personal information

Processing - This is what we do with personal information. It includes how we collect, record, store, share and use personal information

Personal information – This includes personal data and special category personal data

Personal data - This is information that can be used to identify a person. Held in computer systems, mobile devices, laptops, tablets, or in manual records such in paper files and notebooks.

Personal data might include but is not limited to; name, address, date of birth, bank account details, interests.

It also includes opinions about a person. For example, notes on how you think someone has behaved, performed or appears

Special category personal data – this is information about a person's health, religion, political opinion, trade union membership, race or ethnic origin, sexuality

A **data subject** - this is the person whose personal information is being processed. For example, a supporter, employee, volunteer, trustee

A **privacy notice** – this is a short notice when we collect personal information from people to inform them how their personal information will be used and to look at our privacy policy for more detail

A **privacy policy**— this is how we inform people about how their personal information will be used. Bradford North Foodbank's privacy policy is provided on our website at bradfordnorth.foodbank.org.uk/privacy-cookies-policy/

Data processor— this is an organisation that we use to process personal information on behalf of the organisation. For example, an IT service provider.

Information Commissioner's Office (ICO) - this is the government body responsible for enforcing data protection law in the UK

Data Protection Principles

All staff and volunteers are responsible for complying with the principles of data protection legislation which states that personal information must be:

1. Collected and processed in a fair, lawful and transparent way
2. Used only for the reasons it was collected
3. Relevant and not excessive
4. Kept accurate and up to date, and corrected or deleted if there are mistakes
5. Kept for no longer than it is needed
6. Kept safe to protect it from being lost, stolen or used inappropriately
7. Processed in accordance with people's rights

In addition, the GDPR provides rules relating to the transfer of personal data to countries outside of the UK.

See Bradford North Foodbank's data protection guidance for additional information about our data protection working practices.

Data subjects

Bradford North Foodbank's data subjects include:

- employees of the charity
- volunteers of the charity
- trustees of the charity
- financial donors to the charity
- supporters of the charity
- clients receiving emergency food assistance
- clients providing case study information to the charity
- local contacts (referral agencies, food donor groups, other client support services etc)
- complainants

Data processing purposes

Bradford North Foodbank needs to process personal information about our different data subjects to:

- process donations and gift aid claims
- process legacies and pledges
- enable supporters to fundraise for us
- enable supporters to participate in events
- manage relationships with our supporters
- provide supporters with information about us and the work that we do
- manage marketing and communication preferences of our supporters
- provide support to people who need to use the food bank
- develop case studies and stories about our beneficiaries to promote and report on the work that we do
- recruit and employ members of staff
- recruit and manage volunteers
- fulfil our legal and governance obligations

Legal basis for processing personal information

Bradford North Foodbank's legal basis for processing personal information is documented in detail in our Record of Processing Activity (RPOA) which contains an inventory of all key personal data processing activities.

Personal information is processed for our legitimate interests, where appropriate with consent, and in order to meet our legal obligations.

Bradford North Foodbank may process some personal information based upon your legitimate interests. This is where the processing is required to fulfil our organisational objectives, is not to the detriment of our data subjects, and will not cause them damage or distress. We undertake Legitimate Interest Assessments to balance the rights and interests of our data subjects with that of Bradford North Foodbank in order to make a judgement as to whether the legitimate interest condition applies to our processing.

Responsibilities of staff and volunteers

Bradford North Foodbank's Data Protection Lead, who is also a Trustee, is required to:

1. Provide compliance advice to staff
2. Ensure that staff receive appropriate data protection training and guidance
3. Ensure that Bradford North Foodbank's data protection policies and documents are appropriate and up to date
4. Be the focal point for the administration of any subject access requests
5. Deal with data subject rights in relation to erasure, objection, restriction and rectification that staff feel unable to manage themselves
6. Log and assess all personal data breaches
7. Report applicable data breaches to the ICO within the statutory 72-hour time limit
8. Renew, and ensure that Bradford North Foodbank's controller registration with the ICO is accurate annually.
9. Keep a central register of all organisations that Bradford North Foodbank shares personal information with
10. Maintain and update the organisation's Records of Processing Activity, Privacy Notices, and any associated data protection assessments (e.g., DPIAs or LIAs).
11. Advise staff on the interpretation of this policy and guidelines and to monitor compliance with the policy.

All staff and volunteers are responsible for:

1. Working in compliance with the data protection principles as set out in this policy and Bradford North Foodbank's data protection guidance.
2. Ensuring that any personal information that they provide to Bradford North Foodbank in connection with their employment, volunteering or other contraction agreement is accurate
3. Informing Bradford North Foodbank of any personal data breach which they become aware of immediately
4. Responding to any data subject requests to erase, access, correct or object to the personal information held and processed by Bradford North Foodbank.

Data Subjects Rights

Bradford North Foodbank respects the rights of its data subjects including the following rights:

- to be informed – we do this by including appropriate privacy notice information when collecting personal information
- subject access - the right to view their personal information which we hold
- object and / or withdraw consent - where the processing of personal data could cause them significant damage or distress.
- rectification - we must correct any inaccurate or incomplete personal information when asked
- erasure - deletion or removal of their personal information where there is no compelling reason for its continued processing

Data Security

It is the responsibility of all staff, contractors and volunteers authorised to access personal data processed by Bradford North Foodbank to ensure that data, whether held electronically or manually, is kept securely and not disclosed unlawfully, in accordance with this Policy and any associated policies. Unauthorised disclosure will usually be treated as a disciplinary matter and could be considered as constituting gross misconduct in some cases.

Policy Awareness

Data protection awareness will be included as part of induction. Changes to policy on data protection policy or guidance will be circulated to all staff, contractors and volunteers. All staff, contractors and volunteers are expected to be familiar with and comply with the policy at all times.

Redress

Anyone who considers that this policy has not been followed in respect of personal data about themselves should raise the matter with the Data Protection Lead.

Status of this policy

This policy does not form part of the formal contract of employment, but it is a condition of employment that employees will abide by the rules and policies made by Bradford North Foodbank from time to time.

Compliance is the responsibility of all staff and volunteers. Any breach of this policy should be taken up with the Data Protection Lead.

Appendix 1:

Foodbank Client Data Collection

The bottom of each printed foodbank voucher contains a data statement. An equivalent statement is to be read to any clients being referred by the “e-referral” process. This statement makes clear:

- the charity’s commitment to data security
- the “lawful basis” for holding and processing client data
- the client’s data will be retained for statistical analysis
- to help prevent misuse, the dates and locations of foodbank visits may be shared
- client data will not be used for any other purposes
- it will only be seen by people that need to do so for foodbank reasons
- it is never sold or given to any other body

By presenting the voucher (or voucher code) at a foodbank, the client will be regarded as having accepted the associated data statement.

Other Personal Data Collection

When collecting any other data, Bradford North foodbank will ensure that the Data Subject:

- understands why the information is needed, and the “lawful basis” for doing so
- understands what it will be used for and what the consequences are should the Data Subject decide not give consent to processing
- grants explicit written or verbal consent for data to be processed, where consent is required
- is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- has received sufficient information on why their data is needed and how it will be used

Bradford North foodbank will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

Subject Access Requests (SARs)

All Data Subjects have the right to make a “subject access request”, to ask Bradford North foodbank for details of the personal data held about them. If Bradford North foodbank receives a “Subject Access Request”, we will take the following actions within one month:

- Confirm if the charity holds any personal data about the data subject
- Provide them with a copy of that data
- Provide any supporting explanatory materials (e.g. a Data Privacy Statement)

If they wish to, the data subject can ask for a copy of their data in a “commonly used electronic form” (e.g. a familiar file type, such as Excel, CSV, Word, PDF etc). This is their “Right to Portability”.

The foodbank reserves the right to charge a reasonable fee where requests are “manifestly unfounded or excessive” and particularly if they are repetitive. No fee will normally be charged for a party’s first SAR, or where previous SARs have found errors in their data. Where requests are “manifestly unfounded or excessive” and/or repetitive a typical fee will be £10. We reserve the right to increase this for further SARs to reflect the time taken in processing an SAR.

If a SAR reveals that any of the details we hold are incorrect, they will be amended and no fee will be charged.

Bradford North Foodbank will also take reasonable steps to ensure that this information is kept up-to-date by asking data subjects whether there have been any changes.

Data Breaches

Bradford North foodbank takes reported “data breaches” very seriously.

Bradford North Foodbank will take prompt actions to investigate a suspected data breach, to minimise the effect of any breach, and to reduce the chance of it happening again. The actions will be recorded in a Data Breach Register. If a data subject contacts us about a breach involving their data, we will inform them of the actions taken.

The trustees of Bradford North foodbank will be kept informed of any data breaches.

If the trustees of Bradford North Foodbank become aware of any data breach, we will always consider carefully whether it should be deemed a “serious breach”.

If the trustees of Bradford North Foodbank believe there has been a serious breach, we will always:

- report it promptly to the Information Commissioners Office
- take reasonable steps to contact or inform the data subjects whose data is involved
- report it to The Trussell Trust’s governing body of charity trustees, with a copy of the incident record from our Data Breach Register.

Automated Decision Making and Profiling

Bradford North foodbank does not use personal data for automated decision making and profiling.

Named Data Protection Officer	Ben Clymo
Monitoring of the procedures	Foodbank Manager
Reporting To	Trustees
Next Review Date	November 2026

This policy was approved by the board:

Name: Ben Clymo	Signed: <i>Ben Clymo</i>
Position: Chair of Trustees	Date: 6 th May 2025