



Data Protection & GDPR Policy

including our Privacy Notice

Document Control:

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0.2	24/09/2021	S.Gillam		Update to address & beneficiaries' definition
0.3	04/08/2022	K. Brownlee		Ref' to data retention policy added. Storage & Privacy Notice Updated.
0.4	22/06/2023	S.Gillam	22/11/2023	Amendment to format & to standardise policy.
0.5	01/04/2025	K.Brownlee	14/05/2025	Reviewed. Updated – research, lawful basis for processing data, supporters/donors data.
0.6	13/05/2026	K.Brownlee L.Gleed		DUAA 2025 added. References to complaints process expanded. Basis for processing data reviewed and confirmed as still legitimate interest
Date of Review:		1 year from ratification then annually or when circumstances call for earlier review.		

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1. Charity Statements:

Statement of public benefit:

Wiltshire Treehouse is for the benefit of bereaved children, young people, and their families, living/educated within Swindon & Wiltshire.

Mission:

Wiltshire Treehouse wants to see a world where every bereaved child and young person can receive guidance and support to help them through their grieving process. We will enable those in our local communities to develop the coping strategies, skills, and confidence they need to thrive.

Charity Objectives:

Provide high quality, relevant bereavement support and guidance to children, young people & their families.

Improve the initial experience of a child bereavement through training and awareness raising.

Secure the continuity of our organisation, ensuring a future of child specific bereavement support.

Be proud of the charity, a great place to work and achieve.

Our Values:

Growth – Providing a safe space for personal development.

Respect – Beneficiaries, volunteers, and staff are treated with respect and dignity within their journey with the charity.

Inclusivity – Services and support available to the whole community.

Empowerment – Working with beneficiaries to enable change on their terms.

Friendly – Open and welcoming.

2. Purpose, Scope, and Users:

The purpose of this data protection policy is to communicate our commitment to ensuring we safeguard the personal data of all those we work with. Including our beneficiaries, families, their advocates and also our supporters.

The policy applies to all individuals we work with, and staff within the Charity including employees and other workers, such as volunteers, and trustees, temporary workers, and contractors. All staff are expected to put this policy into practice.

A copy of this policy will be distributed to all employees and can also be found in the Employee File kept at the registered charity offices and will be made available to other workers on their engagement. Job seekers and applicants can access the policy on request. In addition, all employees will receive a briefing on this policy during their training.

Any questions about the policy should be directed to admin@wiltshiretreehouse.org.uk

The Trustee body has been consulted and has agreed the contents of this policy. This policy does not form part of employees' contracts of employment and the Company may amend it at any time.

This policy should be read in conjunction with the Data Retention Policy and Schedule.

This policy is reviewed annually and may be amended at any time.

The Children and Young people attending Wiltshire Treehouse Bereavement Charity are of paramount importance and their welfare must always be considered. This policy is intended to support the charity to provide the necessary support required, whilst respecting the privacy of all individuals.

The data covered by the confidentiality policy includes information about all individuals we work with, including beneficiaries, supporters, volunteers and staff whether recorded electronically or in paper form. Breaches of this policy will be handled under the Wiltshire Treehouse complaints procedures.

3. Specific Responsibilities:

The EU data protection regulation General Data Protection Regulation (GDPR) governs the processing of personal data held by organisations. Rules are different for different kinds of information and its purposes.

Wiltshire Treehouse has access to information concerning many families and individuals and it is therefore imperative that the strictest confidentiality is always maintained.

We may also keep anonymised information.

We have reviewed the requirements for appointing a Data Protection Officer (DPO) based on guidance from the Information Commissioner's Office (ICO). We have confirmed that we do not fall within the categories that require a formal DPO appointment. However, to ensure best practice, we will designate a Trustee with responsibility for Data Protection and GDPR, who will oversee compliance, policies, training and act as a point of contact for data issues.

4. Reference Documents:

Information Commissioners Office (ICO) at www.ico.org.uk or via 0303 123 1113.

Data (Use and Access) Act 2025 <https://www.legislation.gov.uk/ukpga/2025/18/contents>

Advice on creating passwords can be found here <https://www.ncsc.gov.uk/collection/top-tips-for-staying-secure-online/three-random-words>

5. Information about individuals:

Wiltshire Treehouse are committed to being open and transparent about what the data we hold and how that data will be used, ensuring confidential services to all individuals (in line with our safeguarding policy).

We will process and maintain personal data about employees, volunteers, organisations, families, supporters, and individuals. Unless expressly authorised for disclosure, personal data will not be disclosed to anyone else other than authorised employees and volunteers or regulatory authorities.

Wiltshire Treehouse receive and store personal information provided by our beneficiaries, employees, volunteers, donors, organisations, supporters and individuals. This may be supplied to us in writing, via email, via the telephone or through our website and social media. We may also receive information about you from third parties, for example, schools, GPs, or another third-party organisation who refers you to the charity for support, such as Child Bereavement UK.

We will take reasonable steps to ensure that the personal data processed is accurate and not excessive.

Confidential information will not be sought unless expressly in the interests of the individual, i.e., to enable a better service delivery. It shall be adequate, relevant, and not excessive in relation to the purpose for which it is processed. Information will only be passed to another agency or to other individuals outside the charity with the consent of the individual (unless consent is not required, as per our Safeguarding Policy). However, in order that we can provide the best possible service it may be necessary to share information with an employee or volunteer within Wiltshire Treehouse. Arrangements would be made to ensure data security.

If an employee or volunteer intends to get information from another agency to help a beneficiary or to refer them to another agency, then this must be explained to the beneficiary and their permission given.

No personal information about employees, volunteers, beneficiaries, supporters or individuals will be given to any third party including a member of their family, without the consent of the individual (unless consent is not required, as per our Safeguarding Policy).

Information will only be divulged on a “need to know” basis. In no circumstances should details of an individual be discussed with anyone outside of the Charity in such a manner that it is possible to identify them (with the exception of safeguarding concerns which should be addressed as per our Safeguarding policy).

We only use personal information for direct marketing purposes if we are allowed to do this by law or have consent.

6. Limits to beneficiary confidentiality:

In certain circumstances Wiltshire Treehouse reserves the right to break confidentiality should this be deemed necessary. These circumstances include but are not limited to:

- If an employee or volunteer believes that a beneficiary could cause danger to themselves or to others.
- If an employee or volunteer suspects abuse or has knowledge of abuse.
- If the beneficiary gives information which indicates that a crime has been or may be committed.
- If disclosure is required by law, for example, by the police.
- If a person is felt to lack the mental capacity to decide. In such cases staff or volunteers will discuss the circumstances with a manager and they will only act in the beneficiary's best interest.
- If the beneficiary gives information which indicates a possible terrorist threat. The decision to break confidentiality will be taken on a case-by-case basis and always in conjunction with a manager or trustee.

7. Storage of Information:

Safe storage of data is important to Wiltshire Treehouse.

Paper copies of personal data are stored in locked filing cabinets and personal data held electronically is stored confidentially and access is only possible by password.

Passwords must not be easy to guess, common words or phrases should be avoided and passwords should not be written down. Advice on creating passwords can be found here

<https://www.ncsc.gov.uk/collection/top-tips-for-staying-secure-online/three-random-words>

All devices should have anti-virus software, including laptops and mobile phones.

All electronic data should be deleted from local hard drives regularly and uploaded to the shared electronic system as necessary. Recycle bins should be cleared on a regular basis.

Paper-based data should be securely disposed of regularly, and information uploaded to the electronic system where appropriate.

Data will be maintained as per the data retention schedule. The schedule seeks to ensure that data is not held longer than necessary.

Wiltshire Treehouse shall take **regular backups of important data, and make sure that these backups are recent and can be restored**. By doing this we aim to ensure the charity can still function following the impact of flood, fire, physical damage or theft.

Mobile technology plays an important role but can present a higher risk of loss and damage as devices are more frequently used on the move. Mobile technology includes mobile phones and tablets.

In order to keep data stored on mobile technology safe we shall ensure each device:

- All users must set strong passwords and avoid reusing passwords across different accounts. Passwords should meet the following criteria:
 - a. At least 12 characters, including letters, numbers, and symbols.
 - b. Changed every 90 Days
 - c. requires a unique pin/password to gain access
- has 2 factor authentication set up where offered the opportunity to do so. This is commonly a password plus a code sent by text or email.
- has 2 layers of security to gain access to data (e.g. one password to unlock device, a separate password to unlock One Drive and Outlook app). Note: for this purpose, emails should be access via the Outlook app, not via the phone's built in email facility
- has 'find my device' function set up that enables us to find, lock and erase a lost device

The above relates to Wiltshire Treehouse owned devices and personal devices used to access charity data.

Staff should not connect any device, including mobile technology, to unknown wifi hotspots for security purposes.

8. Access to data:

This Policy operates on a "need to know" basis and apart from employees, volunteers, or external organisations for reasons of safety no-one will have access to individual or organisational information without express consent from the individual.

Those handling personal or confidential information will be suitably trained and supervised.

Individuals have the right to find out what personal information Wiltshire Treehouse hold about them, and to ask for a copy of that personal data.

If any party concerned has a cognitive, sensory, or physical impairment, we will make reasonable efforts to ensure that all aspects of this policy and exchanges between parties are understood by all concerned.

Inaccurate data will be corrected or removed, and individuals may seek compensation where they suffer damage or distress because of any breach of the Act by the Charity. An individual's request to see their personal data should be made in writing to Wiltshire Treehouse, c/o Westlea Primary School, Langstone Way, Westlea, Swindon, SN5 7BT. Should you wish to make a data request please note that the charity may charge a fee of up to £10 or such higher amount as permitted by law before access can be granted. The Charity also reserves the right to make further enquiries of you to satisfy ourselves as to your identity and to help us locate the data that you have requested.

9. Data Protection Directive to Staff:

Wiltshire Treehouse will comply with the Data Protection Act 2018, GDPR 2018 and Data (Use and Access) Act 2025. Whilst ultimate responsibility for compliance lies with the Trustees, every member of staff/consultant/Volunteer needs to be aware that they too have a responsibility every time personal data is used in the course of their work for the Charity. Indeed, individuals can be prosecuted as well as the organisation. The Acts affect every person, every computer, every email, every paper record, every record of personal information.

Staff must treat all personal data with confidentiality and maintain a high quality of data recording in the interests of good practice. The Wiltshire Treehouse policy aims to be permissive rather than restrictive. Personal information may still be gathered from people, may be processed, and even shared with other authorised persons, but only in a manner that is open and fair.

All records on the database are to be regularly reviewed and kept up to date.

- All data must be collected fairly, accurately, kept up to date, not be excessive and not be held for longer than necessary.
- The format that the information is held in is not relevant. If personal data exists in any form, in electronic or paper-based media, it is covered. Paper based records such as files; card indexes and photographs are also covered.
- Any organised filing system that has internal structure such as an index divider, which means that information about one person can be readily retrieved, is covered.
- Data collection from the public domain, Who's Who, newspapers, annual reports etc is public knowledge and therefore does not have to be disclosed to an individual if the information is correct and not sensitive.
- Individuals have the right to ask what personal information is being held by any given organisation. This can either be provided as a detailed description or can be provided by giving the individual physical access to their files.

10.Data Retention - Personnel:

All information relating to staff and volunteers will be held as per the data retention schedule. This will include (but is not limited to) names, addresses, volunteering undertaken, training and any allegations of a safeguarding nature.

Data may be used to monitor:

- access to training, promotion and other opportunities and benefits
- the impact of our employment policies, including use of the disciplinary and grievance procedure.
- dismissals and other terminations

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

11. Privacy Notice:

Wiltshire Treehouse is a registered charity which delivers bereavement support to children, young people, and their families. We also provide advice and training to professionals and work with people who can help to fund our work.

In this Privacy Notice we explain what personal data we collect and why, how we process it, and your rights. Your data is important to us, and we want you to know that it is handled safely and securely and in line with the Data Protection Act 2018 and Data (Use and Access) Act 2025.

Contact Us

Wiltshire Treehouse is a registered charity (registered charity number: 1159719).

Our registered address is:

Westlea Primary School
Langstone Way
Westlea
Swindon
SN5 7BT

Phone: 01793 734284

Email: admin@wiltshiretreehouse.org.uk

Your Privacy

You have the right to: -

1. Ask us what information we hold about you and receive a copy of this data
2. Ask us to delete or stop communication with you
3. Ask us to transfer a copy of your details to another organisation
4. Ask us to update information about you, if any information we hold on you is incorrect or out of date.

We will acknowledge and act upon your request without delay. If at any time we cannot oblige, due to legal or contractual reasons, we will explain this to you.

We will only send fundraising or marketing material to you if we have clear consent or where there is a legitimate interest to do so. You can change your mind at any time by contacting us.

Your Data

Under data protection law we must have a valid, legal basis to process your personal information. We use the basis of legitimate interest. Our legitimate interest is in running a safe and effective charity. We will only use your personal information if we are sure it is ok to do so, and if we have thought about the effect it would have on you.

There is a variety of ways in which we may collect your personal information, for example:

- Basic contact details when you make an enquiry, submit a referral, sign up for an event or make a request for information
- Financial details when you purchase a service from us or make a donation
- Specific details may be required when you access our direct bereavement support, leave gifts in a will or sign up to be a volunteer.

We may use marketing analytics which help us to send relevant information and marketing to you.

How We Use Your Information

1. To provide information and support through our services and facilitate our training courses

Where you access one of our services, or register for or enquire about attending one of our events (such as training), we will use the information you give us to ensure we provide the appropriate information and support, and to meet internal reporting requirements.

2. To respond to or fulfil any requests, complaints or queries you make to us

If you contact us directly, we will use the information you give to us to handle your enquiry or request. This may include responding to your query or feedback, or sending you relevant information, such as training or fundraising materials. We may also keep a record of conversations we have with you, feedback you provide and any materials we send out to you.

3. To process any donations you make, claim any relevant Gift Aid and maintain a record of your past or potential future financial contributions.

This includes keeping a record of any pledges, gift agreements or any other indications that you are planning to donate to us. We keep a record of any donations we receive for audit purposes, and we are legally required to keep information related to Gift Aid. We may need to use your information to prevent fraud and maintain effective cyber security. We will also use your information to administer any raffles or auctions you participate in, for example, contacting you to let you know you have won a prize.

We may receive this information when you contact us directly, or when you give to us through a payroll giving agency or a third party giving platform or website.

4. To provide you with information and support for any fundraising and campaigning events, activities or volunteering opportunities you sign up to

If you have completed a form or otherwise contacted us to register or enquire about an event or activity, or to sign up to one of our campaigns, we will consider this as a request to send you details about the event, activity or campaign.

Where you provide contact details, we may provide information and support by post, phone, mobile messaging, email, via social media, and any other channels for which you have provided your details. When you have asked for details of an event, we will send you information including, where relevant, ideas for fundraising and reminders and key information about the activity.

We may also receive information through event organisers or through third party giving platforms or websites so we know you are fundraising for us.

Where appropriate, we will use the information you provide to us or to a third party (see above) to identify any help we can offer, specific to the activity you have signed up for and to provide necessary information to event organisers.

5. To manage our recruitment

When applying for a role with us the personal data you provide as part of the recruitment process will only be held and processed for the purpose of the selection processes and in connection with any subsequent employment unless otherwise indicated. You will be asked to provide certain information including your name, contact details, employment history and qualifications.

We will use this information to consider your application, communicate with you about your application and, where successful, follow up with references to meet our statutory and internal monitoring and reporting responsibilities. We may also view social media profiles of applicants, such as LinkedIn, to the extent that it is relevant to your application. Unsuccessful applicant data will be held confidentially within the recruitment system for a period of one year before it is deleted in order that you can access and re-use data in future applications and we can respond to any statutory reporting requests.

6. Surveys

When we collect information for this purpose, we will always explain to you at the time we collect your information how it will be used and whether it will be held anonymously or not.

7. To keep our offices and the people in them safe and secure

You may be asked to complete a sign in register at some of our venues.

Sensitive Data

Additional data will be collected in relation to families who access direct support from the charity, in accordance with our bereavement support service record-keeping policy, to ensure safe and consistent support can be delivered. The details of information storage, consent, confidentiality and safeguarding will be discussed at the outset of any direct support work. This information is only accessible to staff authorised to see it and not to other staff or volunteers.

Children's Data

Due to the nature of our charity's activities, we hold personal information relating to children and young people when they access direct support. These details are only held with the explicit consent of the child's parents/guardian or a young person themselves if they are Fraser competent. Their details are kept securely with restricted access and handled with the greatest respect for privacy.

Special Category

In some circumstances, we may collect sensitive data. An example would be data about ethnic origin. We only hold this information for specific purposes, for a limited time and with your explicit consent. This information is only accessible to staff authorised to see it and not to other staff or volunteers.

Retention

We will retain your information for no longer than is necessary or for the lifespan of our active engagement with you and to meet any legal or regulatory requirements. To comply with professional standards all information will be held in line with our retention policy and schedule.

Support Partners

If you access our website through another site or search engine or if our website has links to other websites, which you click on – we have no control over other support partner sites.

When you give a gift or fundraise for us, we may receive your information and donation from a support partner such as JustGiving, Eventbrite or Payroll Giving.

We will never disclose your personal information to another party unless required by law. Sharing of information under safeguarding policies will be discussed with all families at initial contact.

Transferring Your Information Abroad

To ensure we run the charity efficiently and offer an appropriate service, we use several systems and applications. The information in some of these systems may be transferred to one of our reputable service providers who may store and process this information outside the United Kingdom. We carry out our own due diligence and work under agreed Data Processing Agreements.

Data Security

We take appropriate technical and organisational security measures to safeguard all personal information. We use industry-standard high encryption security measures to protect from loss, misuse or alteration of data under our control. Information in relation to families who receive direct support is securely locked down, so it is only available to relevant staff and volunteers.

If we make any significant changes to the way we manage your personal information or communicate with you, we will update this policy and make you aware of these changes.

Research

We may use your information to help provide a good service and to help us understand how well our services are working. Sometimes, to understand more about how our services are working, we remove information that could identify someone. This is called anonymisation. Then we can share the general information that is left with researchers like the national Childhood Bereavement Network at the National Children's Bureau (NCB) so that they can help us understand what can help across a variety of different services.

In addition, on occasion we may carry out research to determine whether an individual may be a potential major donor or attendee of a special event. We use information available from public sources such as Google, Companies House, The Charity Commission, Electoral Roll Register, Zoopla, reputable news articles, company websites, professional biographies on networking sites as well as geographic and demographic information based on postcodes.

The type of information we collect includes career overview, estimated gift capacity, history of giving to our charity and how the individual is connected with Wiltshire Treehouse, public information on any philanthropic activities and a top-line check on any ethical concerns.

We may also research public records of an individual's trusteeships and previous gifts made to charity or whether a company that the individual is connected to has a corporate social responsibility (CSR) programme. Occasionally we may also research any key networks that the individual is publicly known to be a member of such as on the board of a not for profit or philanthropic body which may have relevance to our activities.

We may also use profiling to produce short biographies of individuals where they are due to meet with one of our staff or attend an event that we may be hosting. This is to enable relevant staff members who are also attending the meeting or event to understand who those individuals are and what their interest or connection to Wiltshire Treehouse may be.

We always seek to ensure that any research or profiling is done in a way that does not unreasonably or unexpectedly intrude on an individual's privacy.

The date that this policy was last reviewed and updated can be found on page 1.

If you have any worries or questions or would like to make a complaint about how your data is handled, please contact admin@wiltshiretreehouse.org.uk in the first instance.

For independent advice about data protection, you can contact the Information Commissioners Office (ICO) at www.ico.org.uk or via 0303 123 1113.

All complaints will be handled in line with the Wiltshire Treehouse Complaints Policy. If you are dissatisfied with the outcome you can contact the ICO for further action and advice.