



Privacy and Data Protection Policy – July 2022

Date of Policy: July 2022

Policy Approved By: BoT

Signature: CA

Overall responsibility for the policy: Board of Trustees

Persons responsible for implementing the policy: COO

Policy Applies To: All Trustees and employees and volunteers of **COMPASS-Ghana** including Organisations working in partnership, contractors and visitors.

Date of next review: 2023

1. This policy sets out the purpose and scope of how **COMPASS-Ghana** approaches the handling of all personal information in line with data protection legislation. It explains how **COMPASS-Ghana** meets its legal obligations in safeguarding confidentiality and adheres to information security standards. It establishes the responsibilities and best practice for data protection arrangements.

Section One: Explanation

2. Personal information is also commonly referred to as personal data or personally identifiable information (PII) and covers 'any information that can be used to identify a living individual either directly or indirectly. This policy is designed to provide assurance to any of **COMPASS-Ghana's** stakeholders and guidance to any person that handles personal or special category information as part of their role.

Section Two: Policy review and changes

3. This policy will be reviewed annually. The responsibility for keeping this policy reviewed and up to date lies with the Chief Operating Officer.

Section Three: Compliance

4. Irrespective of how information is collected, recorded and processed, personal information and special category information must be handled properly to comply with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

5. **COMPASS-Ghana** is registered with the Information Commissioner. The register entry describes, in general terms, the personal information being processed by **COMPASS-Ghana** and covers the types of information we hold and why we hold it. This is a formal notification and is renewed annually.

6. The people that we hold personal information about have the right to be informed, access their own information, to have it corrected if wrong and, in certain permitted circumstances, to have their information deleted or removed from use. **COMPASS-Ghana** will ensure such requests receive prompt and informed responses in line with the relevant policy and procedure.



7. COMPASS-Ghana ensures that all information is obtained, held, disclosed and disposed of in a secure manner and that appropriate training is provided to all employees and volunteers handling such information.

Section Four: Responsibilities

8. The COO is the named Data Protection Officer (DPO). It is the responsibility of the DPO to ensure that the appropriate practice and procedures are adopted and followed by COMPASS-Ghana and any partnerships entered into on its behalf and to provide advice and support to the Board.

9. COMPASS-Ghana is both a data controller and processor. Where appropriate, data sharing agreements will be in place to ensure each organisation/partner has agreed to responsibly manage personal information.

10. Teams are responsible for working with the DPO to ensure:

- ☀ Employees and volunteers attend suitable data protection training and understand relevant policies
- ☀ Ensure privacy is appropriately considered at the start of new projects
- ☀ Data sharing is carried out compliantly
- ☀ Correct information governance procedures are followed with leavers.

11. All COMPASS-Ghana employees and volunteers have a responsibility to inform their line manager and the DPO of any risks or concerns and to follow guidance and training provided.

Section Five: Managing risk

12. COMPASS-Ghana manages information governance risks alongside all other organisational risks. Any identified risks are dealt with without undue delay and mitigated through proactive remedial action and by following best practice guidance. (See Risk Management Policy April 22)

13. COMPASS-Ghana must always consider what is reasonable alongside the rights of individuals. We mitigate risk by only collecting what is necessary and having an up-to-date records management programme in place. We also identify the lawful basis for processing any personal information to ensure it is reasonable. This information is actively recorded and reviewed and where legitimate interest is selected, we ensure it is properly justified. We communicate the lawful bases in privacy notices.

14. Risks will always be assessed on a case-by-case basis. Similarly, while all personal information is carefully managed, more stringent measures will be taken as the sensitivity of information increases.

Section Six: Communicating privacy

15. Privacy statements refer to information given at the point personal information is collected. They are required by law and advise the user on what personal information is being used and how and why it is being collected. COMPASS-Ghana uses three levels for privacy statements:

- ☀ **Privacy notices, 3-7 lines long.**



Short abstracts always placed in a prominent position at the touchpoint. Includes key information and reassurances and links to further support, which is specific to its location.

✿ **Privacy promises, ideally half a page, maximum one page long.**
Medium length and very accessible statements explaining key information relevant to a particular area of privacy that is in line with best practice and offers brand promotion opportunities

✿ **Privacy policies and procedures**
Documents used internally to record and carry out necessary compliance measures. Available to all stakeholders but only on request. Should still be clear and understandable but, particularly in procedures, some jargon may be necessary as it is a working document used by employees.

16. Clear language and form which is accessible for all stakeholders should always be used:

✿ 'Privacy' or 'looking after personal information' rather than 'data protection'

✿ Information' instead of 'data'

✿ Customers / service users etc.' instead of 'data subjects'

✿ Where jargon has to be used to communicate effectively, e.g. cookies, the meaning and reason for the message should be plainly explained. COMPASS-Ghana will make a real effort to communicate and engage the audience by showing how the information applies to them

✿ COMPASS-Ghana should constantly be exploring new and engaging ways to discuss privacy and communicate compliance information to users. A privacy statement can be in any form or media. Data protection information should not disrupt the user journey but instead enhance and better support it and highlight COMPASS-Ghana's values

✿ Where possible use clear phrases such as 'we are not tracking you', 'your information won't be sold' or 'any credit card information is held in a system that is secure and not accessible by the processors.' However, this should not be used to mislead or if it sacrifices clarity.

Section Seven: Privacy Policy — The COMPASS-Ghana Web Site

17. This section on our WEB Site Privacy Policy sets out how you can expect COMPASS-Ghana to use your personal information during your use of our website. Privacy policies relating to other parts of our services are available upon request.

18. **Who to contact:** There are lots of ways you can get in touch with our Chief Operating Officer, who is the nominated Data Protection Officer: (DPO)

✿ Phone: 0787 466 3434

✿ Land Line: 01225 863507

✿ Email: John.davies@compass-gh.org

✿ **Post: Sweetlands, 58 Monkton Farleigh, Bradford on Avon Wiltshire, BA15 2QN**

✿ **For general enquiries:** please use the contact form on this website.



19. **How do we get information?** All the information we collect from this website is provided directly by you for one or more of the following reasons:

- 🌸 You have sent us a message using the enquiry form
- 🌸 You wish to attend an event advertised on the website
- 🌸 You have subscribed to our newsletter
- 🌸 You have applied for a job.

20. **Sharing your information:** We will not share your information with any third parties for the purposes of direct marketing. We collect some statistics from Google Analytics to help us improve the website. However, this is never linked to personally identifiable information or used to track individual usage.

21. A lot of the website doesn't have any cookies, but some pages use first party cookies. These are set by the site itself and can only be read by the site. **COMPASS-Ghana** does not use this information in any way other than to provide a functional website.

22. In some circumstances we are legally obliged to share information. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making throughout.

23. Personal data entered into the website is stored with **Siteground** (www.siteground.co.uk) in London, UK and will not leave the European Union.

24. **Why we can process your information:** Some information such as enquiries relating to feedback on our services or website analytics is collected because it is in **COMPASS-Ghana's** legitimate interest. We are careful to balance our interests with respect for the privacy of our website visitors.

25. Other information, such as submitting enquiries about specific services or applying for work, is collected under our understanding that this may be part of a process leading up to a contract.

26. **How long do we keep your information?** The type of information you provide and for what purpose will impact how long **COMPASS-Ghana** retains those details. It will also change depending on whether you continue your relationship with **COMPASS-Ghana** going forward

27. You will find further retention details in privacy notices around the website when you are entering your information. Please also feel free to contact our Data Protection Officer with any questions.

28. **Your rights:** Under data protection law you have several different rights. You can find out more here: <https://ico.org.uk/your-data-matters>





29. As part of your rights, you can request:

- 🌸 Copies of your information
- 🌸 Details to be rectified if they are inaccurate, or
- 🌸 Your personal information to be erased or processing restricted, though this is only possible under certain circumstances.



- 30. If you would like to act on any of your rights, please use the contact details above. We never use your personal information in automated decision-making or profiling.
- 31. **Complaints:** COMPASS-Ghana strives to meet best practice when handling personal information. If you have any queries or concerns, please contact us as outlined above.
- 32. If you are still dissatisfied, you can make a complaint about the way we process your personal information to the **Information Commissioner's Office (ICO)** who are the UK supervisory authority for data protection. You can find out more at <https://ico.org.uk/>
- 33. **Links to other websites:** Sometimes we provide links to other websites or internet pages. This privacy notice does not cover, nor does COMPASS-Ghana take disproportionate responsibility, for the way those sites use your personal information. Please refer to the privacy notices on the other websites you visit.
- 34. **Using the contact form:** Depending on the nature of your message, your information may be saved into secure internal systems at COMPASS-Ghana, which allow us to answer your enquiry. Both your email address and phone number are required so that we can still contact you even if one is incorrectly entered.
- 35. **The Newsletter:** The newsletter covers all news and events at COMPASS-Ghana. If you ask to sign up to the newsletter your details will not be used in any other way (except to answer your enquiry!). You can opt-out any time by contacting the Data Protection Officer, as above.

Section Eight: Related Regulations

-  UK General Data Protection Regulation
-  Data Protection Act 2018
-  Right of Access Procedure
-  Lawful Basis for Processing Procedure

End