



MHW Foundation CIO

Data Protection and Privacy Policy

This policy ensures that MHW Foundation CIO processes and protects personal data in line with UK GDPR principles, ensuring confidentiality, integrity, and accountability in all operations

MHW Foundation CIO

Date Adopted: 12/10/2025

1. Purpose and Scope

This policy outlines how MHW Foundation CIO (“the Charity”) collects, uses, stores, and protects personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to all trustees, employees, volunteers, contractors, and anyone handling data on behalf of the Charity.

2. Policy Statement

MHW Foundation CIO is committed to protecting the privacy and confidentiality of personal data entrusted to it. We ensure that all personal information is processed lawfully, fairly, and transparently, and that individuals’ rights are fully respected. The Charity upholds the highest standards of data protection and confidentiality in all operations, in line with Charity Commission guidance and ICO requirements.

3. Legal Framework

This policy is based on the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Freedom of Information Act 2000 (where applicable)
- Information Commissioner’s Office (ICO) guidance
- Charity Commission guidance CC8: Internal Financial Controls for Charities



4. Data Protection Principles

MHW Foundation CIO adheres to the seven principles of data protection as defined under Article 5 of the UK GDPR:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

5. Roles and Responsibilities

All trustees, staff, and volunteers have a duty to comply with data protection legislation. Ultimate responsibility rests with the Board of Trustees. Day to day management of data protection is delegated to the Data Protection Lead.

Data Protection Lead: Anthony Young

6. Lawful Bases for Processing

MHW Foundation CIO will only process personal data where a lawful basis exists under Article 6 of the UK GDPR. These include:

- Consent: where the individual has given clear consent for processing.
- Contract: processing necessary for a contract or service agreement.
- Legal obligation: to comply with UK law.
- Vital interests: to protect someone's life.
- Public task: to carry out tasks in the public interest.
- Legitimate interests: where processing is necessary for the Charity's operations and does not override individual rights.

7. Types of Personal Data Collected

The Charity may collect and process the following types of information:

- Contact information (name, address, phone number, email)
- Demographic details (age, gender, location)
- Health or wellbeing information relevant to support services
- Financial data (donations, payments, reimbursements)
- Volunteer and staff records (DBS, training, references)
- Digital data (website or email correspondence)



8. How We Use Personal Data

Personal data is collected for legitimate charitable purposes, including:

- Delivering support, education, and wellbeing services
- Managing volunteers and staff
- Maintaining contact with beneficiaries and donors
- Meeting safeguarding, legal, and reporting obligations
- Communicating with stakeholders and partners
- Complying with funding and auditing requirements

9. Data Sharing and Third Parties

MHW Foundation CIO will only share data with third parties when necessary and lawful to do so. All partners and suppliers are required to comply with UK data protection laws and sign confidentiality or data processing agreements. The Charity does not sell or rent personal data to any third parties.

10. Data Security and Storage

All personal data is stored securely using encrypted systems, secure cloud storage, and password protection. Access is restricted to authorised personnel only. Physical records are kept in locked storage. Servers and digital storage are located in the UK, compliant with UK GDPR requirements.

11. Data Subject Rights

Individuals have the following rights under the UK GDPR:

- Right to be informed
- Right of access (Subject Access Request)
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restrict processing
- Right to data portability
- Right to object
- Rights in relation to automated decision making and profiling

12. Retention and Disposal of Data

Personal data will only be retained for as long as necessary to fulfil the purposes for which it was collected. Retention periods are determined by legal, contractual, and operational needs. All data will be securely deleted or shredded when no longer required.

13. Data Breach Procedure

Any suspected data breach must be reported immediately to the Data Protection Lead. All breaches will be logged, investigated, and, where applicable, reported to the Information Commissioner's Office (ICO) within 72 hours, in accordance with the UK GDPR. Affected individuals will be informed if their data or rights are compromised.



14. Training and Awareness

All staff, trustees, and volunteers will receive data protection training as part of induction and ongoing professional development. Regular refresher sessions and updates will ensure compliance with current legislation and best practice.

15. Monitoring, Review and Compliance

This policy will be reviewed annually by the Board of Trustees or sooner if there are changes in legislation, operational needs, or data breaches. Compliance will be monitored through audits and trustee oversight.

16. Contact and Queries

For any questions or to exercise data protection rights, please contact:

Anthony Young - Data Protection Lead

MHW Foundation CIO

Email: Anthony@mhwfoundation.org.uk

17. Approval and Sign-Off

This Data Protection and Privacy Policy was approved and adopted by the Trustees of MHW Foundation CIO on 12 October 2025 and will be reviewed annually.

Signed:  (Anthony Young, Chair of Trustees)

Dated: 12 October 2025