



Data Protection & Communications Policy & Guidelines

The purpose of this policy document is:

1. To make communications in Medway Foodbank effective, efficient and pertinent
2. To protect individuals, some who are vulnerable, and their personal data.
3. To foster an atmosphere of respect, cooperation and support, both within MFB and with its partners, supporters, donors and the public.
4. To ensure the Data Protection Act and GDPR legislation is adhered to.
5. To maintain a clear, professional and positive corporate image.

This policy includes the latest Data Protection Procedures Review document (April 2018).

Data Protection

1. No volunteer or member of staff at Medway Foodbank will disclose personal client information to a third party unless we need to do so for carrying out our work or where it is a legal requirement to do so (which should be verified, in writing, for each instance by the Chair of the Board of Trustees).
2. New volunteers and staff will sign a Confidentiality Form relating to the Data Protection & Communications Policy as part of the application process. This will be stored with the application form in the Medway Foodbank Office.
3. Copies of the Data Protection & Communications Policy and Confidentiality Form will be included in the signposting folder for all centres.
4. No member of Medway Foodbank staff, volunteers or supporters is to share the personal contact information of anyone else in the network without the direct personal consent of the individual concerned.
5. A completed foodbank voucher is the biggest single risk in protecting the security of clients' personal details. We will seek to protect this data in the following way:

The voucher itself will be reviewed regularly and where appropriate changed by the Trussell Trust system to ensure that it remains in line with current GDPR legislation e.g. the removal of items considered to be 'sensitive' by current legislation.

6. New procedures for the security of completed vouchers were introduced at the end of May 2018. These are detailed in the document called "Procedure for processing

vouchers at foodbank centres” and will combine with the procedures at the foodbank office to ensure data security.

7. Email footers for all accounts with the @medway.foodbank.org.uk address will read as follows from May 25th 2018:

Important Notice: This email, including attachments, may contain confidential, sensitive, legally privileged and/or copyright information. If you have received this email by mistake, please advise the sender on the email listed above and delete the message and attachments immediately. Any review, disclosure, distribution, copying, printing or other use of this information by any persons or entities other than the intended recipient is prohibited. Copies of our privacy statements are available on request.

Client Contact

1. Direct contact with clients should take place only within a Medway Foodbank centre. If there are particularly difficult situations where this cannot be the case then there should be 2 foodbank workers present. Home visits can be made, but only in exceptional circumstances and such alternative arrangements must be agreed in advance with the Project Manager.
2. Telephone contact with clients using personal mobiles or home telephones should be avoided, however in rare occasions when it is necessary precautions should be taken to protect the personal mobile and home numbers.
3. All foodbank workers talking to clients should ensure that no unauthorised person can overhear personal or telephone conversations with or concerning clients.
4. If any person in the Medway Foodbank network receives a mail that they believe is personal or critical of them or what they do, then they should forward this to their immediate supervisor with a copy to the Project Manager **without responding**.

Communications to Groups

Use of email

1. Group mailings must only be sent by the foodbank administrative team using the info@medway.foodbank.org.uk or vouchers@medway.foodbank.org.uk addresses.
2. Group mailings will be addressed to [info@](mailto:info@medway.foodbank.org.uk) or vouchers@medway.foodbank.org.uk and blind copied (bcc) to the required group.
3. All group mailings should be given careful consideration to ensure they are necessary, relevant and useful to the recipients. Any doubts should be resolved by speaking with the Office Manager (staff) and/or the Project Manager.
4. Office Administration should ensure updates to the mail distribution lists are made in a timely fashion. Returned or invalid email addresses should be checked by the office to keep the lists as accurate and valid as possible.
5. Where information is copied to another named individual, this is for information only and no response is expected or required.
6. **Reply All** to received e-mail messages is to be avoided wherever possible.

7. Information sent to standard groups should have standard headings so that recipients are aware of why they have been included (e.g. Dear Centre Managers)

Response time guidelines

1. If a response is needed within a week, please call or text the relevant person or the foodbank office directly and confirm by email.
2. In genuinely urgent situations e-mail **should not** be used - please call or text then e-mail to confirm actions so there is a record.
3. Staff and volunteers are to resist the temptation to allow external persons or agencies to 'impose' urgency upon them.

All staff and volunteers should avoid giving any guarantees of the timescale that they or others will respond in. The position should always be that we will 'do what we can but cannot promise anything'.

Media Communications

Any contact, query or request about any aspect of Medway Foodbank from 'the media' is to be immediately referred to the Project Manager via the office phone or by direct phone call to the Project Manager by the office manager, centre manager or other leader as applicable. Contact from 'the media' should be replied to with "*I have passed / will pass your details on to our Project Manager*" politely and calmly, but with no further information.

No engagement regarding the affairs of Medway Foodbank, its staff, volunteers or clients is to take place with the media without this contact first taking place with the express consent from the Project Manager or a member of the board of trustees. No information or data is to be shared publicly, in any form, without the clear consent of the Project Manager of Medway Foodbank or Chairman of the Board of Trustees.

Use of Social media

Care should be taken when referring to Medway Foodbank on personal social media. Reasonable steps should be taken to ensure that no information or comment is made that is detrimental to the good name and reputation of the organisation, staff, volunteers, supporters, donors or partners. The most sensible approach is only to share and re-post information that emanates from Medway Foodbank itself, as this has already been deemed fit for the public arena.

Any comments posted on social media that are deemed inappropriate to the board or management will be removed without consultation with the author.

No personal information should ever be posted on social media platforms. The policy will be that the first names of individuals will be the most that is provided. Further personal information can only be displayed, by prior agreement, on a temporary post, posted by the individual themselves and should be removed as soon as the post has served its purpose.

Use of the Internet

Medway Foodbank provides internet access to support foodbank purposes only, at its offices, during the hours of normal operation. Access is granted to staff and volunteers on this basis alone.

Other than the automatic updating of standard device Apps and the receiving and sending of personal communications on their own personal devices, permission for any other activities is explicitly forbidden.

Unsuitable material would include data, images, audio files or video files where the use, viewing or transmission is illegal under British law and/or against the rules, essence and spirit of this organisation, its policies and practices.

Accidental access or viewing of any materials that infringes the above, or includes any information of a personal nature, whether considered sensitive by GDPR legislation, or otherwise, should be reported immediately.

No personal information or data, individual or bulk, relating to clients, volunteers, staff, donors, partners or other contacts of Medway Foodbank should ever be sent out via a personal device, using the internet connection provided by Medway Foodbank.

The only acceptable method for the transmission of data, by a person authorised to send it, is via the approved, password protected systems, by those requested to do so by a member of foodbank staff.

Use of Personal Devices

Medway Foodbank does not supply IT equipment for personal use and thus no-one is authorised to remove such equipment from the foodbank offices or to use it for personal purposes whilst on site at the offices/warehouse.

No volunteer is authorised to use any personal device for the storage, use, processing or transmission of ANY PERSONAL DATA relating to Medway Foodbank. The only exception to this is that the Centre Managers will hold contact details for their own volunteers, whilst they are active. This will be deleted immediately that the person stops volunteering.

For guidance on information relating to Social Media platforms, see the relevant section of this policy and associated procedures.

Should Medway Foodbank deem it appropriate to supply mobile phones, laptops, tablets or PCs for use by staff or volunteers in any location, nationally or internationally, then the guidelines for the use of these devices should be the same as is contained in this policy unless explicitly stated in another official document, such as a contract of employment. If a conflict of information arises, please inform your line manager or supervisor immediately.

General

If an employee or volunteer has any doubt about personal information held or shared in any way, the best course of action is to check the situation with their manager or supervisor.

Any concerns about a data breach should be notified to the Foodbank office without delay. No member of staff or volunteer should ever assume that the management has been notified and should always view such instances as urgent and important, and to be given priority over other day-to day business.

Agreed by trustees: 3.4.19

Review date: April 2020