



DATA PROTECTION AND PRIVACY POLICY

1. The purpose of Headlines

According to its current Constitution, Headlines is established for: (a) the relief of sickness of those persons affected by craniosynostosis and any associated condition in particular but not exclusively by the provision of advice, information and support; (b) the advancement of education for the public benefit and the subject of craniosynostosis and its implications for the family.

2. The duties of trustees

According to the Charity Commission, trustees have three main duties: compliance with the law and the charity's own rules and procedures, prudence to ensure the charity is solvent and care to ensure the charity is well run and efficient.

3. The purpose of the Data Protection and Privacy Policy

The purpose of this policy is to explain how Headlines complies with the requirements of the General Data Protection Regulations ("GDPR") which, from 25 May 2018, replaces the Data Protection Act of 1998.

In order to provide support to its members and to operate effectively and efficiently, Headlines needs to collect and process certain personal information, some of which is classed as 'special category' (i.e., sensitive) data. Headlines recognises the importance of protecting personal data, and is committed to processing all such data securely, appropriately and in compliance with the GDPR regulations.

4. Definitions

'Data' is primarily defined as information which:

- (a) Is being processed by means of equipment operating automatically in response to instructions given for that purpose;
- (b) Is recorded with the intention that it should be processed by means of such equipment; or
- (c) Is recorded as part of a relevant filing system or with the intention that it should form part of a filing system.

In practice this means information held on computers, electronic personal devices or paper.

'Processing' is defined broadly as anything that is done to, or with, personal data, including simply collecting, storing or deleting that data.

'Personal data' is defined as "any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified,

directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.”

In practice, this means information:

- a) About a living individual (though the general public’s expectation is likely that this applies to anyone living or dead);
- b) That relates to personal details, family life and professional;
- c) That is linked to a name, either by name or IP address;
- d) That has the potential to impact an individual, whether in personal, family, business or a professional capacity (including opinions expressed about an individual).

‘Data Controller’ means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.

‘Data Processor’ means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Controller.

5. Principles

The GDPR sets out the following key principles for the treatment of personal data by all organisations. Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purpose for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The GDPR provides rights to individuals:

- a) To be informed
- b) To have access
- c) To rectification
- d) To erasure
- e) To restrict processing
- f) To data portability
- g) To object to data processing
- h) Regarding automated decision making and profiling

6. Special Category Data

The GDPR requires that any 'Special Category' personal data is identified by the organisation (similar to the DPA 'sensitive' data).

Headlines processes two special categories of personal data, firstly health information related to the person in a member's family that is affected by a craniofacial condition, and secondly information on children (the child may have a craniofacial condition or be a sibling). This information is only held if the consent of the member or of the parent or guardian of the affected person has been received. The processing and protection of this data is covered in the sections below.

7. Members Data

a) What data do we collect?

When becoming a member of Headlines, individuals complete a Membership Form¹ that requests certain personal data, which we require in order to provide the member with the benefits of membership. We updated the Membership Form in 2018 to ensure that it only requests information that is necessary for this purpose. It is clearly explained to members when completing the form that, by providing us with personal data, through our new member form or in other ways, or by using our website, they are accepting and consenting to Headlines storing and processing their personal data. This is explained in a Privacy Notice which also contains links to this updated Data Protection Policy (which is on the website).

The following information is requested of new members, and is stored on Headlines' database – the member's title; first name and surname; address; phone number(s); email address(es); contact preferences; the type of membership (whether a parent/guardian, person with a craniofacial condition, organisation, relative, professional or other); and which craniofacial condition(s) the member is interested in. Once they are registered, the database will also record the date of their registration and a Membership Number (MID).

Many of our members are parents/guardians with a child who has a craniofacial related condition. When they complete the Membership Form, such members are also asked to complete certain information regarding any of their child(ren) who have a craniofacial condition. We require this information in order to support the family, and to provide them with the benefits of membership. The following information is requested and is stored on Headlines' database – the child's first name and surname, date of birth, gender, the type of craniofacial condition that they have and which hospital they are under the care of. Some parents also provide the first name, surname, gender and date of birth of siblings. Under GDPR, only parents and guardians are able to give consent by providing this information. Other family members, such as grandparents and aunts/uncles, or friends, may join as members and indicate which condition they are interested in and their relationship to the affected person, but they should not provide the name of the affected person.

Where the affected person is over the age of 18, we ask that they become a member of Headlines in their own right, in order to provide consent. In 2018, we undertook an exercise to write to the members that had an affected person and/or sibling who is

¹ This is typically online, but in the past was a hard copy form.

now over the age of 18 (or would be as of 31 December 2018), to ask for those individuals to become members in their own right, thereby providing their own consent for us to retain this information (rather than relying on the parent/guardian consent previously given). Going forward, on an annual basis, we will similarly write to members where the affected person and/or sibling will become 18 during the year.

In some circumstances, the affected person is not able to provide their own consent; for example, they may have severe learning difficulties as a result of the craniofacial and/or other medical conditions that they suffer from. If this is the case, we will ask the parent/guardian to re-confirm (once the affected person is over 18) that they are providing consent on the individual's behalf. We will record on the database that this is the case to meet our legal obligations under GDPR.

Where the affected person or sibling has not provided their own consent (by becoming a member themselves), and the parent/guardian has not re-confirmed their consent, we will remove the personal data of the affected person or sibling from our database. Since the parent(s) are still members, and in order to provide ongoing support to them, we will record just that they have a child with a craniofacial condition, and the nature of the condition, but no other personal data.

We will also record relevant information in our database received by email, messenger or by post, such as information regarding family relationships i.e., the name of a spouse or partner; or whether the member is related to other members in the database.

Other personal data may be collected at other times, such as marital and tax status (for gift aid purposes).

As noted above, we collect summary medical information related to the particular craniofacial condition that the affected person has. Generally, we limit the amount of medical information recorded to just the summary of the condition, but in some circumstance (e.g., to comply with legal obligations such as GDPR), or to provide ongoing support to a family, we record some more detailed medical information, such as whether the affected person has learning difficulties.

If we are informed that a member or affected person has died, we will record the date of death. If a member resigns their membership, we may record the date they resigned (note that this is different to a member who requests to be forgotten - see separate section below).

We may record on the database, information related to which events and activities members have attended and any donations made.

We keep a record of the names of members who attended each Annual General Meeting, in order to meet our legal obligations set out in our Constitution.

b) What do we do with the data that we collect?

Members' data will be processed only to provide members with the benefits of membership e.g., to communicate with them, to organise national and/or regional events. Under no circumstances will any personal data be sold to third parties. There are specific circumstances under which we share a limited amount of personal data

with third parties, to provide members with the benefits of membership (see separate section below).

The only people who have access to the database are the employees of Headlines (currently the Group Administrator). There are circumstances where members' personal data (either from the database or from emails and questions received), needs to be shared between some or all of the Trustees, Helpline Adviser and employees of Headlines, in order for the charity to carry out its objectives². This information is typically shared by email. Wherever possible, we try and remove members' personal data from such emails (e.g., the name of the member) entirely, or limit the personal data included in such emails. In emails with third parties we will not include any personal data regarding members, other than in the specific circumstances outlined below (see section on Sharing of Data).

We communicate with members to keep them updated with information and about our events, for example through our E-News and our member magazine (Headline News). We may also contact them for other legitimate interests of the charity, such as compliance with legal obligations (such as GDPR) or regarding fundraising (since the charity is heavily dependent on donations from and fundraising events held by its members).

We recognise the importance that the personal data we record and process is accurate and we aim to update the database or MailChimp list (see section on Sharing of data below) with any new information received as soon as possible, typically within a few days of receiving the update (other than during employee holidays). This includes ensuring that we do not communicate any further with members who have resigned, died or asked to be forgotten.

Members join Headlines for as long as they wish to (we do not currently require an annual or other periodic renewal), and so we retain data on members until they request for us to delete it.

c) Helpline

Headlines provides a Helpline for anyone that needs support with a craniofacial or related condition. Calls to the Helpline are strictly confidential. The Helpline Adviser (and former Trustee) who responds to calls to the Helpline, makes coded notes in a personalised shorthand of essential personal details that are needed to be able to provide ongoing support for a member. None of these details are recorded in the database and these records are destroyed securely after 7 years.

Some questions are received from members in emails, phone calls, letters or through the Facebook inbox or messenger. These requests are treated confidentially, though as noted above, in order to respond to the question, it may be necessary to share some data between some of the Trustees, the Helpline Adviser and employees of Headlines. Any detailed medical information included by the member in these communications would not be entered into the database (though we would update the database for any amendments, such as a change of address or email address).

² Examples would include data required to help answer questions from members, which members are attending events, regarding donations, potential new Trustees etc.

d) Welfare Grants

In certain circumstances, Headlines may provide some small financial assistance to members (see Welfare Grant Policy). In order to qualify for a welfare grant, a member must complete and sign an application form declaring that they are in need of financial assistance and provide evidence of entitlement to Income Support or certain other Government Benefits. Applications are received by the Group Administrator and reviewed by a Headlines Trustee and Treasurer. The information received as a result of providing this assistance will be treated confidentially and shared only to the extent necessary with the Trustees and employees of Headlines. It will not be shared with third parties (other than the charity's Independent Examiner who has the right of access to all of our books and records). We will record in our database what amount of financial assistance has been provided to a member (or if a request was denied). Data received as a result of providing this assistance will be held for 7 years (legal requirements for retention of books and records) and will be destroyed securely and deleted from the database.

e) Consent and Registration Forms for events

Headlines may require consent or registration forms to be completed related to attendance at Headlines events. These may be online or physical forms, and in some instances we use a third party, Eventbrite, to facilitate the registration and ticketing process. These forms will request the following information about attendees – name, address, email address, phone numbers, potentially date of birth and medical information. We are required to collect medical information for children under the age of 6, for events such as the Annual Family Weekend, in order to ensure that we have appropriate resources available. We may also ask adults or children aged over 6 for medical information if required to help plan an event. This information is event specific and is only shared to the extent necessary e.g., with childcare play specialists at the Family Weekend. This information is kept confidential in line with the safeguarding policies. Adults, or parents of children aged 6 years and older, may also complete separate consent forms with partner organisations³ to help plan an event, such as taking part in activities provided by the venue at which the event is taking place.

f) Photographs, Articles and Videos

We take photographs of members at Headlines events and may publish these or photographs from members on our website, social media, digital news or in hard copy (membership magazine). When attending an event, members are asked whether they consent to having their photograph taken and for us to use it for the purposes outlined above. We will only publish photographs where we have the consent of the member (or parent/guardian).

Some of our members write articles, send photographs or make videos explaining their condition and their experiences in dealing with the condition. We may publish these or make them available on our website, social media, digital news or in hard copy (membership magazine), because they provide support to other members and families going through similar experiences. We will only publish where we have the

³ These organisations will have separate consent forms: GDPR responsibility for personal data on those forms lies with that organisation.

clear consent of the member (or parent/guardian). We may use facilities such as We Transfer, DropBox, Flickr or issuu to transfer and store these.

We will retain such photographs, article or videos permanently, or until the member requests us to delete them.

8. Health Professionals

Some health professionals are members of Headlines; personal data held for them is in line with the section on members' data above.

We may also record the names, contact details (email, phone number) and qualifications of other health professionals who work in the field of craniosynostosis and other related conditions. This information may be obtained from university and hospital websites or directly from the individuals. Such details are kept in the email accounts of the Administrator or Chair and Helpline Adviser.

9. Donors Data and Merchandise Sales

For donations received directly, we keep a record of the name, amount, tax status (for gift aid purposes) and date of donation; we may record the address and, if applicable, their MID. We send an acknowledgement and thank you to all donors (as it is in our legitimate interests to thank donors), but we would only contact them again if they have provided consent for us to do so. We also receive regular subscriptions from some members and non-members. Personal data from direct donors may be received through email, by website or post, and can include personal data of both the fundraiser and actual donors (e.g., for a sponsorship); we need to collect data from both e.g., for gift aid purposes.

We also receive donations through a range of third party agents, such as JustGiving, Virgin Money Giving, Easyfundraising, Paypal Giving and Facebook. Both we and the agents are Data Controllers (and both, separately, responsible for GDPR compliance). The agents provide Headlines with details of fundraisers and donors, including personal data (which may include name, address, amount, tax status (for gift aid purposes), date of donation, email address, and telephone number). The agents will only provide such information (or allow us to access it on our fundraising pages) if the donor has agreed to receive marketing consent from us. This means that we receive some donations anonymously through these agents.

We may publish details of donations and fundraising activities, whether received directly or through an agent, on our website, social media, in E-News or Headlines News or other publications (such as our Annual Report), but we will only do so if we have the consent of the donor.

We sell a small amount of merchandise, either directly at events or through PayPal. For books and records purposes, we keep a record of what was sold, the amount received and the name of the buyer.

We retain information on donations, membership subscriptions and merchandise sales for 7 years (in line with books and records requirements).

10. Service Providers

In undertaking our activities, we enter into contracts with various third parties. These are typically companies, but in some cases can be an individual. We may receive quotes and invoices from such individuals with personal data (name, address, email and website addresses, phone numbers, bank account details) and we retain this information, along with details of the service provided, for our books and records requirements (retained for 7 years). Some of these details are also stored on our bank account provider to expedite future payments.

11. Trustees

The Executive Committee of Headlines consists of volunteer Trustees, all of whom are members of Headlines. The personal data held by Headlines for such individuals as members is covered above.

We also keep other data with respect to Trustees, including:

- Minutes of Executive Committee meetings, including attendance;
- for some Trustees, their bank account details for paying expenses (these are stored with our bank account provider to expedite future payments);
- details of their work experience (when applying to be a Trustee);
- signed forms from each Trustee that they meet the legal eligibility requirements to act as a Trustee;
- copies of Disclosure and Barring Service (DBS) checks regarding contact with children and vulnerable adults;
- signed Data Protection Confidentiality Agreement forms to show that Trustees have read and understand our Data Protection and Privacy Policy (see section on Protection of Data below); and
- other signed forms as required from time-to-time (e.g., to support our application for registration as a charity in Scotland).

The minutes of Executive Committee meetings are kept in both electronic and hard copy by the Secretary and potentially by other Trustees and the Administrator. Details of work experience for Trustees, including potential Trustees, are received by the Chair, but may be shared with other current Trustees. Hard copies of signed forms and DBS checks are kept by the Secretary.

All current Trustees have a Headlines email address to use in their communications as a Headlines Trustee.

12. Protection of Data

Headlines aims to protect the personal data of our members, trustees and employees.

The transmission of information via the Membership Form is done via a secure mechanism that encrypts the data being transferred and is only readable to us, as the recipient. The data we collect on members is held in a Microsoft Access database on the Group Administrator's dedicated Headlines desktop computer. Both the database and the computer are password protected. The website Membership Forms submit data to a Headlines email address whose data is hosted on the charity's domain operated by TSO. All email is also stored in a Gmail account that is used for message management. All charity documents and other files on the

computer are automatically backed up using Microsoft One Drive, which is an SSL-encrypted enterprise level cloud storage solution. The computer has the latest version of Microsoft Windows installed (version 10), with automatic security updates enabled. It runs an industry-standard security suite featuring anti-virus and malware protection, as well as standard firewall rules. The PC sits on an internal home LAN connected to an up-to-date internet router that has been configured for maximum protection against external intrusion threats.

Access to the database is restricted (as noted above), and we aim to eliminate or minimise the amount of personal data included in emails between Headlines' Trustees and employees.

All Headlines email addresses (for Trustees and employees) are provided by Fasthost/TSO. Trustees access and store their emails through their personal mobile smart phones (which are password or fingerprint protected) and/or on personal computers which are password protected.

Any data received on hard copy forms or by letter will be transferred onto the database. The forms/letters will be retained by the Administrator for GDPR compliance purposes, until such time as the member requests us to delete it, at which point we will shred the form (as well as deleting the information in the database).

Any personal data on paper must be shredded.

All Trustees, Employees and our Helpline Adviser are required to sign Data Protection Confidentiality Agreement forms to confirm that they have read and understand the Data Protection and Privacy Policy, and that any personal data held by them as a result of being a Headlines Trustee/Employee/Helpline Adviser must be held securely and cannot be shown to or used by any third party, including after the Trustee/Employee/Helpline Adviser has resigned.

Where we do have to share personal data with a third party, we assess the GDPR compliance implications (see section on Sharing of data below).

MailChimp distribution lists are stored on a secure MailChimp server.

13. Sharing of data

Under no circumstances will any personal data be sold to third parties.

In the following circumstances, we share a limited amount of personal data with third parties related to Headlines' activities:

- sharing a member's name and address with a company that sends out our postal communications;
- sharing a member's name and email address with a company (MailChimp) whose mailing platform we use to send out our email communications;
- sharing some member details with partner organisations or individuals that are providing a service at a Headlines event, such as the Family Weekend; this would typically be names of attendees and dates of birth of those taking part in activities, so that they can be grouped into age-appropriate activities;

- for statutory purposes (see 'Other' in the section below).

Our independent examiner has access to all of Headlines' books and records, in order to examine our accounts.

We review GDPR compliance with all third parties with whom we share data in the circumstances outlined above. This includes ensuring that the information will be treated confidentially by them and used only for the purpose agreed, whether data is transferred overseas or to any other party or sub-contractor, and how long they retain such data for.

MailChimp

We provide the name and email addresses of members who have indicated that they wish to receive communications by email from us. MailChimp store this information for future distributions and their privacy policy states that they "do not, under any circumstances, sell your distribution lists". MailChimp send emails to the email addresses on this list at the request of Headlines⁴. We update the list periodically to ensure that information is consistent with our database (e.g., to update for new members, removing members or updated contact details). Individuals can also update their contact information directly with MailChimp (see Right of Access section below). When an individual opens an email sent via MailChimp, MailChimp will track that the email has been opened, the user's IP address, browser or email client type and other similar details. Data collected by MailChimp help us understand how an email communication has performed and whether an adequate number of members have received information.

Data passed to MailChimp are transferred out of the EU to the U.S.A.. MailChimp have stated that they participate in and have certified their compliance with the EU-U.S. Privacy Shield, and that for GDPR the European Commission have confirmed an "adequacy decision" that an adequate level of protection exists for the personal data transferred under this Privacy Shield. For more information, please read [MailChimp's guide to GDPR](#) or [MailChimp's Privacy Policy](#). MailChimp do transfer personal data to certain sub-processors which perform some critical services (e.g., helping MailChimp prevent abuse and provide support to their customers); they note that they take steps to protect information by requiring such third parties to enter into a contract with MailChimp that requires the third party to use the personal information in a manner consistent with MailChimp's privacy policy.

MailChimp allows subscribers (such as Headlines) to opt out of their data being included in MailChimp's data science projects. Headlines has opted all users out of being included in such data science projects, but individuals can contact MailChimp if they want to opt in.

Events

We do not share member's medical information from our database with third parties. Members may be asked to separately describe a medical condition as part of a consent or registration form for attending events, and for some events we use a third

⁴ Headlines is the Data Controller, and MailChimp the Data Processor in this arrangement.

party, Eventbrite⁵, to facilitate registration and ticketing. As noted above, we are required to collect medical information for children under the age of 6, for events such as the Annual Family Weekend, in order to ensure that we have appropriate resources available. This information is event specific and is only shared to the extent necessary e.g., with childcare play specialists at the Family Weekend. This information is kept confidential in line with the safeguarding policies. Adults, or parents of children aged 6 years and older, may also complete separate consent forms with partner organisations⁶ to help plan an event, such as taking part in activities provided by the venue at which the event is taking place.

Other

- If a donor has indicated that we can claim gift aid, we will share their name and address with HMRC for statutory purposes, in order to prove that they are a UK taxpayer.
- Some limited personal data is stored with our bank account provider to expedite payments.
- We are required to report to the Charity Commission and include in our Annual Report a list of all current Trustees, and this information is publicly available.
- As noted elsewhere in the policy, we back-up data to the Microsoft One Drive cloud and/or to DropBox. This is necessary to protect our data and the charity. Everywhere we store your data, or where personal data may be transferred to as a result of backing-up data, complies with EU regulations on data security and gives equivalent protection. This includes data centres based in the USA which work to ensure they are fully compliant for organisations, like Headlines, based in Europe.
- We use Doodle Poll to help assess availability for Trustee meetings (Trustees enter their own details).
- We use Survey Monkey to collect feedback on events such as the Family Weekend.
- With the consent of the member (or parent/guardian), we may provide a name and contact details for someone to an organisation such as Hannah's Fund.
- Our website and some of our communications may contain links to third party websites and their privacy practices may be different to ours. Any personal data submitted to those sites is governed by the privacy policy of that website.

14. Social Media

Headlines is a user of social media, in order to try and create an online community and enable peer-to-peer support for members. Headlines also uses social media to inform members about events and activities. All the social media platforms used by us (namely Facebook, Twitter and Instagram) rely on users' consent to join. It is up to individual users to determine what personal data they include on social media (including messenger services). Therefore users and the social media platforms are responsible for data protection for such data. Information shared on social media platforms is done at the users' own risk, and users' interactions with social media

⁵ Members complete the forms directly with Eventbrite (i.e., Headlines do not share information with them); Eventbrite state that they "participate in and comply with the EU-U.S. Privacy Shield Framework".

⁶ These organisations will have separate consent forms: GDPR responsibility for personal data on those forms lies with that organisation.

platforms are governed by the privacy policies of the companies that provide them. Please also refer to our Social Media Guidelines.

It should be noted that Headlines' employees and Trustees do not share private information of its members, employees or Trustees over social media.

15. Right of Access and to Rectification

Individuals (such as members, including children, or employees) are entitled to obtain confirmation that their data is being processed and to have access to their personal data (i.e., confirmation on what personal data we hold about them). We must provide a copy of the information free of charge⁷, within one month of receiving the data access request. Access requests will typically be dealt with by the Group Administrator and the Headlines Data Controller, but in certain circumstances may be handled by another Trustee.

Before providing the information, we must use 'reasonable means' to verify the identity of the person making the request, which may include requiring the individual to verify their identity.

We will typically provide the information in the same format as the request has been received in (i.e., by email or post).

Individuals have the right to have data rectified and we will respond and correct such data requests as soon as we can. If you object to how we process your data, please contact the Data Controller.

Members may contact MailChimp directly to access, correct or delete information that MailChimp may hold about the data subject.

16. Right to Be Forgotten

GDPR establishes a clear right for individuals to request to 'be forgotten' and for an organisation to erase any personal data held on that individual. In communications with members and on our website, we make clear that members can contact us at any time to change their contact preferences, which could include a request to be forgotten.

If we receive such a request, the Group Administrator will use 'reasonable means' to verify the identity of the person making the request. The Group Administrator will inform the Data Controller and, within one month of the request, all personal data held with respect to that member will be deleted from the database. The only entry left on the database will be the membership number and a note stating that the details were deleted at the member's request, with the date of the request and the date of deletion being recorded (to meet Headlines' legal obligations under GDPR).

17. Further Processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection and Privacy Policy, then we will provide you with a new Privacy Notice explaining this, prior to commencing the new processing.

⁷ A 'reasonable' fee may be charged where a request is manifestly unfounded or excessive, particularly if it is repetitive.

18. Cookies

As is the case with most internet sites, our website (www.headlines.org.uk) uses cookies. Our Cookies policy is published on our website:

“This website uses Google Analytics. Google Analytics uses cookies to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

We do not make any attempt to find out the identities of those visiting this website. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.”

We also embed videos from You Tube and Vimeo. Pages with this embedded content may present cookies from these websites. We do not control these cookies and you should check the relevant third party website for more information about these.

19. Employee Data

In order to meet our legal requirements, and for other legitimate purposes, we collect and process certain data related to our employee(s).

(Section redacted)

We may have candidates who apply for employment but are unsuccessful. We will keep limited personal data (name, address and/or phone number, and the person’s CV and any notes from interviews with them) for up to 12 months after the person has been informed that they were not successful, in case a future opportunity arises.

20. Data Breaches and Reporting

In the event of any personal data breach, we will follow the GDPR guidelines and reporting protocol of the Information Commissioner’s Office (ICO).

21. Named data protection officer(s)

Data Controller – Charles Edwards (Treasurer and Trustee) is the Data Controller on behalf of Headlines.

Data Processor – Justine Tweedie (Group Administrator) is the Data Processor for Headlines.

22. Review and evaluation

This policy is reviewed and approved by the Executive Committee of Trustees and will be reviewed at least annually.