



GREEN SHELTER SOCIETY UK

Privacy and Data Protection Policy

Document control

Field	Details
Organisation	Green Shelter Society UK
Charity registration number	1192803
Policy owner	Board of Trustees
Operational lead	Data Protection Lead or nominated trustee
Version	1.0
Approval status	Broad approved
Effective date	4 th September 2026
Next review	12 months from approval, and after any serious incident or significant change in risk
Applies to	Trustees, staff, volunteers, sessional workers, contractors and relevant partners

Approval requirement Before approval and publication, trustees must verify the charity's actual systems and providers, approve the retention schedule and confirm the privacy contact.

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1 Purpose and status of this document

This document explains how Green Shelter Society UK collects and uses personal information and the standards it applies when handling it. Its public-facing sections form the charity's privacy notice. Its governance and security sections also guide trustees, staff, workers and volunteers.

GSSUK will handle personal information lawfully, fairly, transparently and securely under the UK GDPR, the Data Protection Act 2018, applicable electronic communications law and other relevant requirements. This policy must reflect what the charity actually does. It must be updated before any materially different use of personal information begins.

2 Who we are and how to contact us

Green Shelter Society UK is the data controller where it decides why and how personal information is used. The charity works on sustainable gardening, community participation, nature, food growing, seed and plant sharing, education and environmental activities.

Privacy enquiries and requests may be sent to info@greenshelter.org.uk or to Green Shelter Society UK, 55 Chertsey Rise, Stevenage, Hertfordshire, SG2 9JJ. The Board of Trustees will nominate a trustee or other suitable person to coordinate privacy matters.

GSSUK will state separately if it acts jointly with another controller for a particular project and explain the relevant responsibilities to the people affected.

3 Scope

This policy covers donors, supporters, volunteers, workers, applicants, trustees, beneficiaries, event participants, parents and carers, complainants, visitors, contractors, suppliers, partner contacts and website users. It applies to information handled through the website, email, telephone, paper forms, donation services, events, seed and plant initiatives, schools, libraries, places of worship, community partners and other charity activity.

Separate just-in-time notices may be used on forms, event registrations, photography notices, volunteer applications and donation pages. Those notices must be consistent with this policy and available when information is collected.

4 Data protection principles

- Use personal information lawfully, fairly and transparently.
- Collect it for specified, explicit and legitimate purposes and do not use it incompatibly.
- Collect only information that is adequate, relevant and limited to what is needed.
- Keep information accurate and correct it where necessary.
- Keep identifiable information only as long as necessary.
- Protect information with appropriate technical and organisational security.
- Be able to demonstrate compliance through decisions, records, training and review.

5 Personal information we collect

- Identity and contact information, such as name, title, address, email address and telephone number.
- Donation, Gift Aid and transaction information, but full payment-card details should normally be handled by the payment provider rather than stored by GSSUK.
- Volunteer and applicant information, including interests, availability, experience, qualifications, references and role-related checks.
- Event, membership or participation details, attendance, preferences and feedback.
- Emergency contacts and relevant accessibility, dietary, allergy or health information.
- Correspondence, enquiries, complaints, safeguarding concerns, accidents and incident records.
- Photographs, video, audio, quotations and consent or permission records.
- Website and technical information, such as IP address, browser, device, pages visited and cookie identifiers, depending on the tools actually used.
- Equality-monitoring information where collection is necessary, proportionate and explained.
- Information received from referees, partners, venues, public bodies or publicly available sources where lawful and relevant.

6 How and where we collect information

Information may be collected directly through website, email, telephone or paper forms; donation and payment platforms; volunteer applications; event registrations; conversations and correspondence; photography or recordings; cookies; and observation of incidents. It may also come from a parent or carer, referee, delivery partner, venue, professional adviser, emergency service, regulator or another source that is entitled to share it.

When information is obtained from another source, GSSUK will provide the required privacy information within the applicable period unless a lawful exception applies. The notice will identify the categories of information and the source as specifically as reasonably possible.

7 Purposes and lawful bases

GSSUK must identify and document an appropriate lawful basis before processing begins. The basis depends on the purpose and may change the rights available. Consent will not be used merely because it appears convenient, and it must be freely given, specific, informed, recorded and as easy to withdraw as to give.

Purpose	Lawful basis generally used
Responding to enquiries and administering participation	Legitimate interests; steps connected with an agreement where applicable.
Volunteer recruitment and administration	Legitimate interests; legal obligation where applicable; consent only for genuinely optional uses.
Processing donations and maintaining records	Contract or requested transaction; legitimate interests; legal obligation for accounting and tax records.
Gift Aid administration	Legal obligation and administration of the donor's declaration.
Event and activity management	Contract or requested service where applicable; legitimate interests; legal obligation for safety duties.
Safety safeguarding and emergencies	Legal obligation; legitimate interests; vital interests in a life-threatening emergency. Additional conditions may be required for sensitive information.
Complaints fraud security and legal claims	Legitimate interests and legal obligation, depending on the circumstances.
Newsletters campaigns and fundraising	Consent or legitimate interests where permitted, subject to electronic-marketing rules and the person's right to object.
Promotional photographs stories and recordings	Consent where appropriate; another documented lawful basis only where justified and explained.
Essential website operation and security	Legitimate interests or legal obligation; essential cookies do not require consent but must be explained.
Non-essential analytics or advertising cookies	Consent where required.
Impact evaluation and equality monitoring	Legitimate interests or consent as appropriate, with an additional condition for special-category information.

If GSSUK relies on legitimate interests, it will record the purpose, necessity and balancing assessment. If it relies on a legal obligation, it will identify the relevant duty. The final basis for each actual processing activity will be maintained in the charity's internal data-protection records.

8 Special category and criminal offence information

Information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetics, biometrics used for identification, sex life or sexual orientation receives additional protection. Criminal-conviction and offence information is also subject to specific rules.

GSSUK will collect this information only when necessary and proportionate, identify both an Article 6 lawful basis and the required additional legal condition, restrict access and apply stronger safeguards. Where the law requires an appropriate policy document or other record, it must be in place before processing begins. DBS certificate information will be handled under the charity's safeguarding and recruitment arrangements and not retained longer than permitted.

9 Volunteers applicants and representatives

Volunteer and applicant information may be used to assess suitability, communicate about opportunities, arrange duties, provide support, reimburse authorised expenses, manage training and supervision, meet safeguarding and safety duties and maintain necessary records.

- Give applicants privacy information when their details are collected.
- Limit access to people involved in the relevant decision or administration.
- Keep equality monitoring separate from selection decisions where practicable.
- Use references and checks only for a defined purpose and with appropriate transparency.
- Tell emergency contacts that their details have been supplied where appropriate.
- Use volunteer information for unrelated publicity or fundraising only where there is a separate lawful basis.

10 Children and young people

Where GSSUK collects information about a child, the privacy information must be concise, clear and appropriate to the child's age and understanding. Parents or carers will receive relevant information where appropriate, but a child may have data-protection rights in their own name depending on the circumstances.

- Collect only the information needed for the activity, safeguarding, emergency response or lawful communication.
- Use suitable consent or permission arrangements for photographs, online services and optional publicity.
- Do not publish unnecessary names, contact details, precise locations or other information that could increase risk.
- Apply restricted access and retention arrangements to consent, health, safeguarding and incident records.
- Complete a data-protection impact assessment where proposed processing is likely to create high risk.

11 Donations Gift Aid and payment processing

GSSUK may use donor identity, contact, donation and transaction information to process gifts, issue acknowledgements, administer Gift Aid, maintain accounts, prevent fraud, respond to queries and meet legal or regulatory duties. Fundraising communications are handled separately under section 12.

Online or card payments should be processed through an approved payment provider. GSSUK will explain the provider and relevant data sharing at the point of donation or in this notice once the service is confirmed. GSSUK will maintain an internal record of what information it receives, whether full card details are accessible and whether an international transfer occurs. Donor information will not be sold.

12 Communications marketing and fundraising

Administrative messages needed to manage a donation, enquiry, application, event or volunteer relationship are different from optional direct marketing. GSSUK will identify the correct lawful basis and comply with applicable electronic-marketing rules before sending newsletters, appeals or campaign messages.

- Explain what people are signing up to and keep evidence of consent where consent is used.
- Provide a clear unsubscribe or opt-out method in appropriate marketing messages.

- Act on objections and withdrawals promptly and keep only the minimal suppression information necessary to avoid contacting the person again.
- Do not make consent to unrelated marketing a condition of receiving a service or participating in an activity.
- Check the rules before using bought, shared or partner mailing lists.

Right to object A person has an absolute right to object to the use of their personal information for direct marketing. GSSUK will stop that marketing when an objection is received.

13 Photographs recordings and stories

Before taking or using identifiable photographs, video, audio, quotations or personal stories, GSSUK will explain the intended use, audience, publication channels and expected duration. It will use an appropriate lawful basis and obtain consent or permission where required.

- Provide a practical way for people to avoid photography at organised activities where reasonably possible.
- Use enhanced safeguards for children and adults at risk and follow the Safeguarding Policy.
- Do not attach unnecessary personal information or precise location information to published media.
- Record permissions and any restrictions and communicate them to photographers and publishing volunteers.
- Respond reasonably to withdrawal or objection, recognising that removal from printed material or third-party sharing may not always be fully possible.

14 Website cookies and analytics

The website may use cookies or similar technologies for essential functions, preferences, security, analytics or embedded content. GSSUK must maintain a separate Cookie Notice or consent panel listing the cookies and tools actually in use, their provider, purpose and duration.

Non-essential cookies must not be placed before valid consent where consent is required. Refusing non-essential cookies should be as easy as accepting them, and people must be able to change their choice. Website tools must be reviewed whenever plugins, embedded services, hosting, analytics or advertising technology change.

15 Sharing information and service providers

GSSUK may share relevant information with organisations that provide website hosting, email, cloud storage, databases, event registration, communications, fundraising, payments, accounting, IT support or other services. It may also share information with professional advisers, auditors, insurers, banks, HMRC, funders, venues, delivery partners, emergency services, safeguarding bodies, police, courts, regulators or other authorities where lawful and necessary.

- Share only what is necessary for a defined purpose and check the receiving organisation's role.
- Use an appropriate written processor contract where a supplier processes information on GSSUK's behalf.
- Use a data-sharing or joint-controller arrangement where responsibilities need to be agreed.
- Carry out proportionate due diligence on security, confidentiality, deletion, breaches and subcontractors.
- Do not sell or rent personal information.

GSSUK will maintain an internal register of its providers and key partners and name them in this notice or at the point of collection where a more specific explanation is reasonably possible.

16 International transfers

Some website, email, payment, mailing, cloud or social-media providers may process information outside the UK. Before using such a provider, GSSUK will identify the destination and legal transfer mechanism and complete any required transfer risk assessment. The privacy notice will explain relevant transfers, safeguards and how a person may obtain further information.

17 Retention and deletion

GSSUK will keep identifiable information only for as long as needed for the stated purpose, legal or regulatory requirements, safeguarding, insurance, dispute resolution or legal claims. It will use an approved retention schedule, review information periodically and securely delete or anonymise it when no longer required.

Appendix A provides the initial schedule. Trustees must confirm it against the charity's actual records, accounting advice, safeguarding requirements, insurance terms and limitation periods before approval. A record subject to a complaint, investigation, legal hold or safeguarding need may be retained longer, with the reason documented.

18 Security and personal data breaches

- Limit access according to role and remove access promptly when it is no longer needed.
- Use strong authentication, secure devices and systems, updates, backups and appropriate encryption.
- Avoid unnecessary downloads, personal accounts and uncontrolled sharing links.
- Store paper records securely and dispose of them confidentially.
- Train people handling information and require confidentiality.
- Assess suppliers and maintain recovery and incident-response arrangements.

A suspected loss, disclosure, unauthorised access, alteration or destruction of personal information must be reported immediately to the Data Protection Lead. GSSUK will contain and investigate the breach, record the facts, effects and response, assess risk to individuals, and notify the ICO and affected people within applicable timescales where legally required. Nobody should conceal or independently contact affected people without authorisation unless urgent safety action is necessary.

19 Individual rights

Depending on the circumstances and lawful basis, a person may have rights to be informed, obtain access, correct inaccurate information, request erasure, restrict processing, receive certain information in a portable format, object to processing and avoid certain solely automated decisions. A person may withdraw consent at any time where consent is the basis, without affecting earlier lawful processing.

Requests may be sent using the contact details in section 2. GSSUK may ask for proportionate information to verify identity and understand the request. It will respond within the applicable legal period, explain any extension or lawful refusal, and not normally charge a fee. Rights are not absolute, and information about another person, safeguarding duties or legal obligations may affect the response.

GSSUK does not currently use solely automated decision-making or profiling that produces legal or similarly significant effects. If this changes, the privacy notice will explain the logic, significance, likely consequences and available safeguards before processing begins.

20 Complaints

A person who is unhappy with GSSUK's handling of personal information should contact the charity so the concern can be investigated. They also have the right to complain to the Information Commissioner's Office. Current contact and complaint information is available at ico.org.uk. Raising a privacy concern will not result in unfair treatment.

21 Governance training and review

- The Board of Trustees has overall responsibility for data-protection governance and approval of this policy.
- The Data Protection Lead coordinates records, advice, rights requests, breaches, supplier checks and reviews.
- Project leads must use approved forms and systems and consult the lead before collecting new sensitive information or introducing a new provider or technology.
- Trustees, staff and relevant volunteers must receive proportionate privacy and security guidance before handling personal information.
- GSSUK will maintain suitable records of processing, lawful-basis decisions, consents, sharing arrangements, breaches and high-risk assessments where required.
- This policy will be reviewed at least annually and sooner after a significant breach, complaint, system or supplier change, new processing purpose or relevant change in law or guidance.

22 Trustee approval

The Board of Trustees confirms that it has reviewed this policy, verified the operational details and retention schedule, assigned responsibility and agreed the implementation and review arrangements.

Approval record	Details
Approved by	Board of Trustees
Date approved	04 th September 2026
Chair name and signature	MS Rahman, MS RAHMAN
Effective date	04 th September 2026
Next review date	04 th September 2027

Appendix A Retention schedule

Record type	Proposed period to approve	Notes
Unsuccessful volunteer applications	Normally up to 6 months after the process	Extend only where a documented legal or operational reason applies.
Volunteer records	During the relationship and normally up to 2 years afterwards	Keep selected financial, safeguarding or legal records longer where required.
Emergency contacts	Until the relevant activity or relationship ends	Delete promptly when no longer operationally necessary.
Event registrations and attendance	Normally up to 2 years after the event	Shorter where no follow-up, insurance or evaluation need exists.
Enquiries and routine correspondence	Normally up to 2 years after closure	Longer for unresolved complaints, disputes or legal holds.
Donations Gift Aid and financial records	For the applicable accounting, tax and charity-law period	Trustees or accountant must specify the exact period before approval.
Marketing preferences and consent	While active; retain a minimal suppression record after opt-out	Review inactive contacts and avoid renewed marketing.
Photographs recordings and stories	For the approved use, with review at least every 3 years	Remove when no longer needed or appropriate, subject to practical limits.
Website logs and cookies	According to the verified cookie and security-log inventory	State actual cookie durations in the Cookie Notice.
Complaints	According to the complaint outcome and legal-claims assessment	Trustees must approve a specific schedule.
Health safety and accident records	According to legal, insurance and claims requirements	Children and long-latency harm may require longer retention.
Safeguarding records	According to the approved safeguarding retention schedule	Store separately with strictly limited access.
Supplier and contract records	Contract term plus the applicable claims and accounting period	Retain key privacy terms and deletion confirmation.

Appendix B Related documents and guidance

Internal documents

- Equality, Diversity and Inclusion Policy;
- Health and Safety Policy and relevant activity risk assessments;
- Volunteer Policy;
- Complaints and Whistleblowing Procedure;
- Safeguarding Policy;
- Photography, Social Media and Digital Safety arrangements; and any recruitment, disciplinary, grievance or reasonable-adjustment procedures that apply.

External guidance

- UK General Data Protection Regulation;
- Data Protection Act 2018;
- Privacy and Electronic Communications Regulations;
- Data (Use and Access) Act 2025 and relevant commencement provisions;
- Information Commissioner's Office guidance on privacy information, lawful bases, children, security, breaches, cookies and individual rights; and
- ICO privacy notice generator for charities and voluntary organisations.

Trustees should check current ICO guidance when approving or reviewing this policy because official guidance may change as legislation is implemented.