



Crowborough Foodbank

Privacy Notice (UK GDPR & Data Protection Act 2018 Compliant)

Version: March 2026

Approved by Trustees: 25 March 2026

Next Review: March 2027

1. Who We Are

Crowborough Foodbank is a registered charity (Charity No. 1194485) and a registered Data Controller with the Information Commissioner's Office (ICO Registration No. ZA040870).

We operate as an independent charity within the Trussell Trust network.

For the purposes of UK data protection law, Crowborough Foodbank is the Data Controller.

Contact Details

Data Protection Lead: Foodbank Coordinator

Email: coordinator@crowborough.foodbank.org.uk

Address: All Saints Church, Church Road, Crowborough, East Sussex, TN6 1ED

2. Our Commitment to Data Protection

We are committed to handling personal information lawfully, fairly, transparently and securely in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)

We recognise that many of our clients are in vulnerable circumstances. We take additional care to ensure personal information is treated with dignity, sensitivity and strict confidentiality.

3. How We Collect Personal Data

We collect personal data:

- Directly from individuals (clients, volunteers, donors)
- From referral agencies (e.g. local authorities, social prescribers, schools, support organisations)
- From the Trussell Trust (where relevant to foodbank operation)
- Through our website forms
- Through email, telephone or written correspondence
- From Gift Aid declarations submitted to HMRC

Where we receive information from third parties, we expect them to have informed individuals that data will be shared with us.

4. Categories of Personal Data We Process

A. Foodbank Clients

- Name and contact details
- Address and postcode
- Household composition
- Referral information
- Information relating to financial hardship
- Health information (where relevant to support)
- Ethnicity (where required for monitoring or reporting)
- Safeguarding information

B. Donors and Supporters

- Name and contact details
- Donation history
- Gift Aid declarations
- Communication preferences

C. Volunteers and Trustees

- Name and contact details
- References
- Emergency contact details
- Training and role records
- Health disclosures (where relevant to safe working)
- Safeguarding suitability information
- DBS information (where applicable)

D. Suppliers and Professional Contacts

- Business contact details
- Payment and invoicing information

5. Lawful Basis for Processing (Article 6 UK GDPR)

We process personal data under the following lawful bases:

Providing foodbank support

Legitimate Interests (Article 6(1)(f))

We process client information to assess eligibility and provide emergency food and related support. This is necessary for the effective operation of the charity and fair allocation of limited resources. We conduct and retain a Legitimate Interest Assessment (LIA) to ensure this does not override individuals' rights.

Managing volunteers and trustees

Contract (Article 6(1)(b)) and Legitimate Interests

Gift Aid administration

Legal Obligation (Article 6(1)(c))

Financial record keeping

Legal Obligation

Safeguarding

Legal Obligation and Vital Interests

Donor communications

Consent or Legitimate Interests, depending on the circumstances

Where consent is relied upon, it may be withdrawn at any time.

6. Special Category Data (Article 9 UK GDPR)

We may process special category data including:

- Health information
- Ethnicity
- Safeguarding records

We rely on the following conditions:

- Article 9(2)(b) – Employment and social protection law
- Article 9(2)(g) – Substantial public interest (Schedule 1 DPA 2018)

- Article 9(2)(c) – Vital interests
- Article 9(2)(a) – Explicit consent (where appropriate)

We maintain an Appropriate Policy Document as required under Schedule 1 of the Data Protection Act 2018.

7. Criminal Conviction Data

Where criminal conviction data is processed (e.g., DBS checks or safeguarding concerns), this is handled in accordance with:

- Article 10 UK GDPR
- Schedule 1 Data Protection Act 2018

An Appropriate Policy Document is maintained.

8. Automated Decision-Making

Crowborough Foodbank does not carry out automated decision-making or profiling that produces legal or similarly significant effects on individuals.

All eligibility and support decisions involve human review.

9. Data Sharing

We may share personal data with:

- The Trussell Trust – See note 1 below.
- Referral agencies
- HMRC (for Gift Aid)
- Banking providers
- Professional advisers (legal, accounting, insurance)
- IT and secure cloud storage providers
- Statutory authorities where safeguarding or legal obligations apply
- Law enforcement where required by law

Note 1 - Crowborough Foodbank uses the Trussell Trust's Data Collection System (DCS) to record client referral and visit information. Authorised staff from the Trussell Trust and from Crowborough Foodbank can access information held on the DCS. If you visit another foodbank within the Trussell network, authorised people at that foodbank may also be able to view information about your previous visits. This enables the network to provide consistent and appropriate support.

We do not sell personal data.

Where third parties process data on our behalf, written Data Processing Agreements are in place.

10. International Transfers

Where cloud providers store or process data outside the UK, we ensure appropriate safeguards are in place, including:

- UK International Data Transfer Agreements (IDTA)
- UK adequacy regulations

11. Data Retention

We retain personal data only as long as necessary.

Category	Retention Period
Foodbank clients	6 years from last contact
Donors (financial records)	7 years
Volunteers	6 years after leaving
Safeguarding records	Minimum 6 years (longer if required by safeguarding law)
Gift Aid records	7 years
Complaints	6 years from resolution

Data is securely deleted or confidentially destroyed once retention periods expire.

12. Data Security

We implement appropriate technical and organisational measures including:

- Password-protected systems
- Role-based access controls
- Locked physical storage
- Secure cloud systems
- Encrypted devices where appropriate
- Volunteer confidentiality agreements
- Data breach procedures

Where a personal data breach poses a risk to individuals, it will be reported to the ICO within 72 hours where required.

13. Legislative Developments

The Data (Use and Access) Act 2025 (DUA Act) received Royal Assent and came into force on 19 June 2025. This Act introduces changes to the UK data protection framework, including new provisions around "recognised legitimate interests" and updated guidance on lawful bases for processing. The ICO is in the process of updating its guidance to reflect these changes. Crowborough Foodbank is monitoring developments and will update this

Privacy Notice as necessary to reflect any applicable changes arising from the DUA Act and revised ICO guidance.

14. Your Rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict processing
- Data portability (where applicable)
- Withdraw consent (where consent is relied upon)
- Object to processing (including where we rely on legitimate interests as our lawful basis)

Requests should be made to the Data Protection Lead.

We will respond within one calendar month.

You also have the right to complain to the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

Telephone: 0303 123 1113

15. Cookies and Website Use

Our website uses cookies in accordance with the Privacy and Electronic Communications Regulations (PECR).

Non-essential cookies are only activated with your consent via our cookie banner.

You may withdraw consent at any time via your browser settings or cookie controls.

Further details are provided in our Cookie Policy.

16. Policy Review

This Privacy Notice is reviewed annually or sooner if required by changes in law or operational practice.
