

Autism Bucks

Data Protection and Cyber Security Policy and Procedures

Version	Date	Author	Comment
v1.1	17 Jan 2019	M Hollett	Initial draft extracted from handbook. Updated to reflect replacement of DPA 1998 with GDPR DPA 2018
v2.0	26 Aug 2026	N Cary	Final draft replacing Autism Bucks Data Policy v1.1 dated 17 Jan 2019. Updated to reflect Data (Use and Access) Act 2025 changes and current accepted standards and best practice.

Table of Contents

1	PURPOSE AND SCOPE.....	- 3 -
2	OUR APPROACH TO PERSONAL INFORMATION	- 3 -
3	PERSONAL INFORMATION WE COLLECT AND WHY	- 5 -
4	SPECIAL CATEGORY AND SENSITIVE PERSONAL INFORMATION	- 7 -
5	STORAGE AND ORGANISATIONAL RECORDS.....	- 8 -
6	ACCESS AND CONFIDENTIALITY	- 10 -
7	COMMUNICATIONS AND MESSAGING	- 11 -
8	THIRD PARTIES AND SHARING PERSONAL INFORMATION	- 12 -
9	SAFEGUARDING AND WELFARE CONCERNS.....	- 14 -
10	RETENTION AND DISPOSAL OF PERSONAL INFORMATION.....	- 16 -
11	INDIVIDUAL RIGHTS	- 17 -
12	DATA BREACHES	- 19 -
13	SECURITY AND PERSONAL DEVICES	- 20 -
14	RESPONSIBILITIES.....	- 22 -
15	LAWFUL BASIS FOR USING PERSONAL INFORMATION.....	- 23 -
16	ACCURACY AND KEEPING INFORMATION UP TO DATE	- 25 -
17	PAPER RECORDS	- 26 -
18	REVIEW AND APPROVAL	- 27 -
	APPENDIX A — DATA RETENTION SCHEDULE	- 29 -
	APPENDIX B — PRINCIPAL SYSTEMS AND THIRD-PARTY SERVICES	- 32 -

1 Purpose and Scope

Autism Bucks is committed to handling personal information responsibly, securely and proportionately. As a small charity run entirely by volunteers, we aim to protect the privacy of our members, Trustees, volunteers and others who contact or interact with us without creating unnecessary administrative processes.

This Policy explains the principles Autism Bucks follows when collecting, using, storing, sharing and disposing of personal information, and the reasonable measures we take to protect that information.

Autism Bucks collects and uses personal information only where there is a genuine reason connected with the work of the Charity. We aim to collect no more information than we need, to keep it only for as long as it remains necessary or appropriate, and to ensure that information the Charity genuinely needs is held within appropriate Autism Bucks-controlled systems.

This Policy applies to all Trustees and volunteers when handling personal information on behalf of Autism Bucks. It applies regardless of how that information is received or communicated, including through online forms, email, telephone calls, messaging services, online meetings, face-to-face conversations and paper records.

Autism Bucks does not provide computers or mobile devices. Trustees and volunteers therefore use their own devices when carrying out Charity activities. This Policy applies to their handling of Autism Bucks information on those devices, but does not seek to regulate their personal use or management of privately owned equipment.

The Policy should be read alongside other Autism Bucks policies and procedures where relevant, particularly those relating to safeguarding, complaints and risk management. Those documents govern how Autism Bucks responds to matters within their scope; this Policy governs the appropriate handling of personal information arising from them.

Specific operational information which may change from time to time, including data-retention periods and the principal systems and third-party services used by Autism Bucks, is contained in the Appendices. These may be updated where necessary without changing the underlying principles of this Policy.

2 Our Approach to Personal Information

Autism Bucks aims to take a practical and proportionate approach to data protection. We recognise that protecting personal information is important, but also that the Charity is run entirely by volunteers and that our arrangements must be straightforward enough to work effectively in practice.

When handling personal information, Autism Bucks will follow these principles:

2.1 We collect information for a reason

We will only collect or record personal information where there is a genuine purpose connected with the work of Autism Bucks. We will not collect information simply because it might be useful at some point in the future.

2.2 We collect only what we need

We aim to keep the amount of personal information we hold to the minimum reasonably necessary for its purpose. We do not routinely collect demographic information about protected characteristics simply for monitoring purposes. Where there is a genuine reason to undertake equality monitoring, we will normally seek to do so voluntarily and anonymously wherever practicable.

2.3 We recognise that members are individuals

Autism is a varied and individual condition and may be accompanied by other conditions, needs or circumstances. Members may choose to tell us information about themselves that helps us understand their individual circumstances and interact with them appropriately. Where that information has an ongoing and useful purpose in supporting their participation in Autism Bucks, it may form part of their membership record.

We will not assume that all autistic people have the same needs or should be treated in the same way.

2.4 We use information only for appropriate purposes

Information provided for a particular purpose will not be used for an unrelated purpose without an appropriate reason for doing so. The fact that someone has chosen to disclose information to Autism Bucks does not, by itself, mean that the Charity needs to record or retain it permanently.

2.5 We keep information accurate where it matters

We will take reasonable steps to ensure that personal information we use is accurate and will correct or update information when changes are brought to our attention. Autism Bucks does not routinely require members to reconfirm information where there is no practical need to do so.

2.6 We protect confidentiality

Personal information learned through an Autism Bucks role must be treated as confidential. Trustees and volunteers should access, use or discuss information about an individual only where there is a genuine Autism Bucks reason for doing so and should involve only those people who need to be involved.

2.7 We keep information only for as long as it serves a purpose

Personal information will not be retained indefinitely simply because it may conceivably be useful in the future. Different types of information have different legitimate retention needs. The periods adopted by Autism Bucks are set out in the Data Retention Schedule at Appendix A.

2.8 We ensure information the Charity needs remains with the Charity

Information which Autism Bucks genuinely needs as part of its organisational record should be held in an appropriate Charity-controlled system. Personal devices may be used to access and work with Charity information, but should not become the only permanent repository for information that Autism Bucks needs to retain.

2.9 We distinguish conversations from organisational records

Autism Bucks does not maintain case files about its members. Information shared in an email, conversation or message does not automatically need to become a permanent record. Where information does need to be retained for a specific organisational purpose, we aim to retain the information necessary for that purpose rather than preserving all the surrounding correspondence indefinitely.

2.10 We are open about the information we hold

Members and others whose personal information we hold may exercise their rights in relation to that information. Autism Bucks will respond openly and appropriately to requests to see, correct or delete personal information, subject to any circumstances in which information needs legitimately to be retained.

2.11 We learn from mistakes

Where personal information is accidentally lost, disclosed, accessed or used inappropriately, Autism Bucks will take reasonable steps to contain the problem, consider any action or reporting required, record the incident where appropriate and reduce the likelihood of it happening again.

3 Personal Information We Collect and Why

Autism Bucks collects different types of personal information depending on how an individual interacts with the Charity. We do not seek to build detailed profiles of members or other individuals and collect information only where it has a genuine purpose.

3.1 Membership information

When someone applies to join Autism Bucks, we collect the information needed to administer their membership, communicate with them and establish that they fall broadly within the Charity's geographical and charitable remit.

We do not require evidence of an autism diagnosis. Applicants may describe their relationship with autism by selecting from the options provided on the membership form, and Autism Bucks accepts that information as provided.

Applicants may also choose to provide information about their individual circumstances, needs or experiences. This can be important in helping us understand the person as an individual and interact with them appropriately. Relevant information of this kind may form part of the membership record where it has an ongoing useful purpose.

Where necessary, we may use an applicant's postcode to establish whether they live within, or sufficiently close to, Buckinghamshire for membership to be appropriate.

3.2 Information provided by another person

Autism Bucks recognises that some people may need or prefer assistance in contacting us or completing a membership application. A relative, carer, support worker or other person may therefore provide information on someone's behalf.

Where this happens, the contact details provided may belong to the person assisting them rather than to the prospective member. Autism Bucks will not normally contact someone merely because another person has referred or mentioned them to us. We wait for the individual, or someone acting with their involvement, to make an application for membership.

3.3 Events and activities

When members apply to attend an event or activity, we collect the information needed to organise and deliver it safely and appropriately.

Depending on the activity, this may include attendance and transport information, dietary requirements, allergies, accessibility requirements, and information members choose to provide about needs, concerns or circumstances relevant to their participation.

The operational management of risks associated with events and activities is covered by the Autism Bucks Risk Management Policy and relevant Risk Assessments. This Policy governs how personal information collected for those purposes is handled and retained.

3.4 Enquiries and correspondence

Autism Bucks receives enquiries and correspondence from members, prospective members, relatives, carers, health and social care professionals and other individuals and organisations.

Correspondence may contain personal information about the person contacting us or about another individual. We use that information to understand and respond appropriately to the enquiry. We do not routinely create a separate personal record merely because somebody has contacted us.

3.5 Volunteering and Trustees

People interested in volunteering may provide their contact details and other information through our Volunteer Interest Form so that we can contact them and discuss their interest.

Autism Bucks also holds the information reasonably necessary to administer the roles of its Trustees and active volunteers and to meet its governance and safeguarding responsibilities. Where a DBS check is appropriate for a role, relevant information is handled in accordance with the arrangements applying to those checks.

3.6 Surveys and feedback

Autism Bucks may use surveys and other forms of feedback to understand members' experiences and improve the Charity's activities.

We normally design surveys so that respondents do not need to identify themselves. Where a person chooses to identify themselves, or where identifiable information is genuinely required, that information is handled in accordance with this Policy and retained only for an appropriate period.

3.7 Photographs and images

Autism Bucks may take or use photographs from activities and events for purposes such as the Charity's website, newsletter or social media.

We do not assume that attendance at an event constitutes permission to publish an identifiable image. Where an individual is identifiable, Autism Bucks seeks their permission before using the image.

3.8 Website and online services

People using the Autism Bucks website may provide personal information through online forms. The website and associated services may also process technical information necessary for operation, security, analytics and cookie management.

Autism Bucks uses appropriate consent and cookie-management arrangements for non-essential website technologies. Further information about the principal systems and third-party services used by the Charity is contained in Appendix B.

4 Special Category and Sensitive Personal Information

Because Autism Bucks exists to support autistic adults, some of the information members choose to provide will inevitably be particularly personal or sensitive. This may include information about autism, disability, physical or mental health, other conditions, support needs or personal circumstances.

Autism Bucks does not routinely seek medical evidence or detailed health information and does not maintain medical or clinical records about its members. However, avoiding all sensitive information would prevent us from understanding members as individuals and responding appropriately to their differing needs and circumstances.

4.1 Information provided by members

Members may choose to tell us about aspects of their health, disability, experiences or circumstances which they consider relevant to their involvement with Autism Bucks.

Where this information has an ongoing and useful purpose, it may form part of the member's membership record. Information which is relevant only to a particular enquiry, event or situation should not automatically become part of their permanent membership information.

4.2 Event-specific information

Members may provide sensitive information when applying to attend an event or activity, including allergies, health conditions, accessibility requirements, fears, concerns or other information they believe Autism Bucks needs to know.

Such information is used for the relevant activity and for any associated safety or accessibility requirements. It is not automatically added to the member's ongoing membership record simply because it has been disclosed.

4.3 Information provided by others

Relatives, carers, support workers and professionals sometimes provide sensitive information about another person when contacting Autism Bucks or assisting them with an application.

We will use such information only where it is appropriate for the purpose for which it was provided. The fact that information has been disclosed to Autism Bucks by somebody else does not automatically mean that it should become part of an individual's permanent membership record.

4.4 Equality and demographic information

Autism Bucks does not routinely ask members to provide information about characteristics such as ethnicity, religion, sexual orientation or gender for monitoring purposes.

We recognise the importance of equality, diversity and inclusion, but do not believe that routinely collecting identifiable information about protected characteristics is necessary simply to demonstrate that commitment. Where there is a genuine reason to undertake equality monitoring, participation will normally be voluntary, and information will be collected anonymously wherever practicable.

4.5 Handling sensitive information

Sensitive information will be treated with particular care. Access should be limited to those who have a genuine Autism Bucks reason to use it, and it should not be discussed, copied or retained more widely than is reasonably necessary.

Where sensitive information no longer serves the purpose for which Autism Bucks legitimately holds it, it should be deleted in accordance with the Data Retention Schedule.

5 Storage and Organisational Records

Autism Bucks aims to ensure that information the Charity needs is held within appropriate Charity-controlled systems and remains available to the Charity rather than depending upon the personal records of an individual Trustee or volunteer.

5.1 Central organisational records

SharePoint is the principal repository for Autism Bucks organisational records. It is used for information including governance documents, policies, meeting records, financial and funding information, membership records and other information which the Charity needs to retain centrally.

Other Charity-controlled systems are used where appropriate for particular purposes, including member communications, email and website administration. The principal systems and third-party services used by Autism Bucks are identified in Appendix B.

5.2 Personal devices

Autism Bucks does not provide computers or mobile devices. Trustees and volunteers therefore use their own devices when carrying out Charity activities.

Personal devices may be used to access, receive and work with Autism Bucks information. Trustees and volunteers are expected to take reasonable precautions to prevent unauthorised access to Charity accounts and information.

Autism Bucks does not seek to prescribe how Trustees or volunteers manage their privately owned devices generally. Our requirements relate only to the reasonable protection of Charity information accessed or held through those devices.

5.3 Local copies of Charity information

Working copies of documents or information may sometimes be created or downloaded onto personal devices as part of normal Charity activity. This is acceptable where reasonably necessary.

However, a personal device should not become the only permanent repository for information which Autism Bucks needs to retain. Information forming part of the Charity's organisational record should be stored in the appropriate Charity-controlled system.

Local copies containing personal or confidential information should not be retained unnecessarily once they are no longer required for the purpose for which they were created or downloaded.

5.4 Email and correspondence

Autism Bucks email accounts are organisational resources. Correspondence may legitimately be retained within Charity-controlled email systems for an appropriate period where it provides useful operational history or may reasonably be required for follow-up, accountability or reporting.

Email should not, however, be used as a permanent substitute for an organisational record where information needs to be retained by Autism Bucks for a longer-term specific purpose.

Correspondence should not be retained indefinitely simply because it might conceivably be useful in the future. Retention periods for correspondence are set out in Appendix A.

5.5 Organisational continuity

Information and accounts used for Autism Bucks business belong to or are held on behalf of the Charity, even where an account is allocated to and named after an individual Trustee.

Autism Bucks will maintain reasonable arrangements to ensure that access to important Charity information and systems does not depend upon the continued availability of one individual.

When a Trustee or volunteer leaves a role, access which is no longer required should be removed and any Charity information which needs to be retained should remain available to Autism Bucks. Personal or confidential Charity information held locally should not continue to be retained unnecessarily after the individual's involvement with the Charity has ended.

6 Access and Confidentiality

Autism Bucks recognises that its Trustees have collective responsibility for the Charity and that most Trustees also undertake practical volunteering and operational roles. The information a Trustee may reasonably need therefore varies according to circumstances.

6.1 Trustee access

Trustees may have access to Autism Bucks organisational and member information where this is appropriate to the systems they use and the responsibilities they undertake.

Having access to information does not mean that it should be accessed without reason. Trustees should access, use or discuss personal information only where there is a genuine Autism Bucks purpose for doing so.

Autism Bucks does not normally restrict access to Charity information by category alone. Access to particularly sensitive information should nevertheless be limited where this is reasonably necessary, and Trustees are expected to access information only where there is a genuine reason connected with their responsibilities.

6.2 Volunteer access

Volunteers do not normally have access to member records or other confidential personal information.

Where a particular volunteer role genuinely requires access to personal information, access may be specifically authorised by Autism Bucks and should be limited to what is reasonably required for that role.

A DBS check does not, by itself, provide or imply authority to access personal information.

6.3 Confidentiality

Trustees and volunteers may become aware of personal or sensitive information through conversations, emails, messages, meetings, events or other Charity activities.

Information learned through an Autism Bucks role must be treated as confidential. It should not be shared more widely within the Charity than is reasonably necessary and must not be disclosed outside Autism Bucks or used for personal purposes unless there is an appropriate reason for doing so.

Trustees may discuss information about individual members with one another where this is genuinely necessary for the work of the Charity. This may include one-to-one discussions or small groups involving only those Trustees who need to consider the matter.

6.4 Trustee meetings

Significant matters concerning individual members may occasionally need to be discussed at Trustee meetings. Meeting minutes should record decisions, actions and information necessary for the Charity's governance without unnecessarily recording sensitive details about individuals.

Where identifying an individual in the minutes is not necessary to understand or evidence the decision made, their name should normally be omitted.

6.5 Sharing with volunteers

Where a volunteer needs information about an individual member in order to carry out a particular activity or responsibility, only the information reasonably necessary for that purpose should be shared.

The fact that a volunteer is helping at an Autism Bucks event or activity does not, by itself, mean that they need access to the member's wider membership information.

6.6 Access when roles change

Access to Autism Bucks information should reflect an individual's current role and responsibilities. Where someone leaves the Charity or no longer requires particular access, that access should be removed as part of the Charity's normal offboarding arrangements.

7 Communications and Messaging

Autism Bucks uses a range of communication methods in carrying out its activities. These include email, WhatsApp, online meeting platforms and face-to-face or telephone conversations.

The choice of communication method should be appropriate to the information being discussed and the people who need to receive it.

7.1 Email

Autism Bucks provides individual Charity email accounts for Trustees. These accounts should normally be used for Charity correspondence rather than personal email accounts.

Personal information may be exchanged by email where this is reasonably necessary for Autism Bucks activities. Care should be taken when selecting recipients, forwarding messages or including information about other people.

Bulk communications to members are normally sent through the Charity's member communications system.

Where an email is sent directly to multiple members, their email addresses should not normally be visible to other recipients. BCC or another appropriate method should be used unless there is a genuine reason for recipients to know one another's addresses and they have agreed to this.

7.2 WhatsApp and messaging

Autism Bucks uses WhatsApp for communication between Trustees and, where appropriate, between Trustees and volunteers.

The Charity may create temporary WhatsApp groups containing only the Trustees and volunteers involved in a particular event or activity where this assists with coordination.

Personal information about members may be discussed through WhatsApp where there is a genuine operational reason to do so, but discussions should involve only those people who need the information.

Autism Bucks does not create WhatsApp groups containing members. This avoids unnecessarily disclosing members' telephone numbers and other WhatsApp profile information to one another.

Members may create and operate their own WhatsApp or other messaging groups. Such groups are independent of Autism Bucks and are not managed or moderated by the Charity.

7.3 Online meetings

Autism Bucks may use online meeting platforms to provide member sessions and other Charity meetings.

Member sessions are not recorded by Autism Bucks. Participants are not required by Autism Bucks to register specifically for a meeting, although the meeting platform may process account, profile or technical information associated with their participation.

Chat or other information generated through an online meeting should not be retained by Autism Bucks unless there is a genuine reason to keep it.

7.4 Telephone and face-to-face conversations

Trustees and volunteers may receive personal information through telephone calls or face-to-face conversations.

The fact that information has been communicated verbally does not mean that it needs to be recorded. A record should be created only where there is a genuine organisational reason to retain the information, including where another Autism Bucks policy or procedure requires a record to be made.

7.5 Member contact details

Contact details obtained through Autism Bucks must not be used for personal purposes or disclosed to other members without an appropriate reason and, where necessary, the individual's agreement.

This does not apply to contact details or personal relationships which a Trustee or volunteer has independently of Autism Bucks. Those relationships do not become Autism Bucks activities merely because the other person is also an Autism Bucks member.

8 Third Parties and Sharing Personal Information

Autism Bucks does not routinely share members' personal information with other organisations and does not sell, provide or exchange membership lists or contact details for marketing or other unrelated purposes.

8.1 Sharing where necessary

There may be circumstances in which Autism Bucks needs to share personal information with another organisation or individual.

This may include situations involving safeguarding, immediate safety, emergency services, legal or regulatory requirements, insurers or professional advisers, or another legitimate and proportionate reason connected with the Charity's responsibilities.

Where information needs to be shared, Autism Bucks will aim to share only the information reasonably necessary for the particular purpose.

Nothing in this Policy prevents a Trustee or volunteer from sharing information where this is reasonably necessary to respond to an immediate risk of harm or emergency.

8.2 Service providers

Autism Bucks uses external organisations and online services to provide technology and other facilities necessary to operate the Charity.

These may process or store personal information on behalf of Autism Bucks, for example by providing email, document storage, website hosting, online forms, member communications or other services.

Autism Bucks will use reputable service providers and take reasonable steps to ensure that appropriate data protection and security arrangements are in place.

The principal systems and third-party services used by the Charity to process personal information are identified in Appendix B.

8.3 Artificial intelligence services

Trustees and volunteers may use Artificial Intelligence (AI) tools to assist with Autism Bucks work, including drafting, summarising, research and administrative tasks.

Personal, confidential or sensitive information relating to members or other individuals should not be entered into a public or personal AI service unless there is a genuine need to use that information and the service and account being used provide appropriate data-protection arrangements for that purpose.

Wherever reasonably practical, information used with an AI service should be anonymised or stripped of identifying details. Particularly sensitive information, including safeguarding information, should not be entered into an AI service merely for convenience.

Information produced by an AI service should not be assumed to be accurate. Trustees and volunteers remain responsible for reviewing and making decisions about information used on behalf of Autism Bucks.

8.4 Third-party fundraising and donation services

Autism Bucks may use external services through which individuals can make donations or support fundraising activities.

Autism Bucks does not process online donations directly through its own website. Information provided to a third-party fundraising or donation service is subject to that service's own

arrangements, although Autism Bucks may receive limited information about a donation where the donor has chosen or permitted this.

Information received by Autism Bucks about donors will be used only where there is a legitimate Charity purpose, such as administering or acknowledging a donation, and will not automatically be used to create an ongoing donor database.

8.5 Information received about other people

Autism Bucks sometimes receives information about another person from a relative, carer, support worker, health or social care professional or other third party.

Receiving such information does not mean that Autism Bucks will automatically contact the person concerned or create a permanent record about them. We will consider the information only to the extent reasonably necessary for the purpose for which we received it.

Where somebody contacts Autism Bucks about a prospective member, we will not normally approach that person directly. We wait for them, or somebody acting with their involvement, to make an application to join the Charity.

8.6 Legal and regulatory disclosure

Autism Bucks may disclose personal information where required by law or where disclosure is reasonably necessary to fulfil a regulatory, safeguarding or other legal responsibility.

Where appropriate, the Charity will consider the privacy and confidentiality of the individuals concerned and disclose no more information than is reasonably necessary.

9 Safeguarding and Welfare Concerns

Autism Bucks takes safeguarding seriously and responds to safeguarding and welfare concerns in accordance with its Safeguarding Policy and Procedures.

Autism Bucks is not a first responder, crisis, therapeutic or case-management service and does not assume ongoing responsibility for members' welfare. The Charity does not maintain case files about its members.

9.1 Recording concerns

Where a Trustee reasonably considers that a concern affecting a member's safety, wellbeing, treatment or participation is sufficiently significant to warrant an organisational record, a proportionate entry should be made in the Autism Bucks Safeguarding Register.

A concern may warrant recording even where the circumstances giving rise to it occurred outside an Autism Bucks activity or in a forum or group which the Charity does not operate or control, if there is a reasonable possibility that the matter could affect Autism Bucks members or their participation in the Charity.

The purpose of the Safeguarding Register is to provide an organisational record of significant concerns brought to the Charity's attention and how Autism Bucks considered and responded to them. It is not intended to create an ongoing history or case record about individual members.

9.2 Content of safeguarding records

Entries should contain sufficient factual information to understand the nature of the concern, when and how it was raised, how Autism Bucks considered it, and any response, decision or follow-up considered appropriate.

Information should be recorded proportionately. Names and other identifying information should be included only where they are reasonably necessary to understand the concern, the Charity's response or any subsequent action.

Allegations and opinions should not be recorded as established facts. Where information has been reported by another person, the record should make clear that it has been reported or alleged.

The Safeguarding Register should not contain unnecessary transcripts of conversations, speculation, diagnoses or other information which is not relevant to the Charity's consideration of the concern.

9.3 Responding to concerns

Recording a safeguarding or welfare concern does not mean that Autism Bucks has assumed responsibility for managing the circumstances which gave rise to it.

Depending on the circumstances, an appropriate response may include taking action within an Autism Bucks activity, discussing the matter with appropriate Trustees, monitoring whether a situation affects the Charity or its members, signposting to an appropriate service, or making a referral or disclosure where this is required or appropriate under the Safeguarding Policy.

Where there is an immediate risk of serious harm, protecting the individual takes priority over ordinary confidentiality considerations and appropriate emergency or statutory services may be contacted.

9.4 Access and confidentiality

Information in the Safeguarding Register is confidential Charity information. Trustees may access safeguarding information where there is a genuine reason connected with their responsibilities to do so.

Information should not be shared more widely among Trustees than is reasonably necessary for dealing with the matter. Volunteers should receive safeguarding information only where it is necessary for their role or for the safe delivery of an Autism Bucks activity.

9.5 Relationship with other policies

The Safeguarding Policy and Procedures determine how Autism Bucks recognises and responds to safeguarding concerns. This Policy governs how the personal information arising from those concerns is recorded, accessed, used, shared and retained.

A matter which also constitutes a complaint, accident, data breach or other incident may additionally be handled under the relevant Autism Bucks policy or procedure. This does not require the same information to be unnecessarily duplicated in multiple records.

10 Retention and Disposal of Personal Information

Autism Bucks will retain personal information only for as long as there is a genuine operational, safeguarding, governance, financial, legal or regulatory reason to do so.

Different types of information have different useful and appropriate lifespans. The retention periods adopted by the Charity are set out in the Data Retention Schedule at Appendix A.

10.1 Retention decisions

When deciding how long information should be retained, Autism Bucks will consider why the information was collected, whether it continues to serve that purpose, whether it may reasonably be required for accountability or follow-up, and whether there is any legal, regulatory or other requirement to retain it.

Information will not be kept indefinitely simply because it might conceivably be useful in the future.

Where information has continuing organisational value but the personal details within it do not, Autism Bucks should retain the useful organisational information without retaining unnecessary personal information wherever reasonably practicable.

10.2 Membership information

Membership information is retained while an individual remains a member of Autism Bucks.

Because member communications are the means through which Autism Bucks maintains its relationship with members and informs them about Charity activities, an individual who unsubscribes from member communications will normally be treated as having ended their membership.

Their ordinary membership information will then be removed in accordance with Appendix A.

Ending membership does not automatically require the deletion of information held separately for another legitimate purpose, such as a safeguarding concern, complaint, accident, financial record or other matter which the Charity reasonably needs to retain.

10.3 Events and activities

Personal information collected specifically for an event or activity should not become a permanent record merely because a member participated.

Event-specific information should be deleted after the appropriate retention period unless some or all of it needs to be retained for a separate reason, such as an accident, safeguarding concern or complaint.

Non-personal information about an event, including attendance totals, expenditure, outcomes and useful lessons for future activities, may be retained as part of the Charity's organisational history.

10.4 Correspondence

Emails and other correspondence may be retained for a reasonable period where they provide useful recent organisational history, support follow-up or reporting, or allow Autism Bucks to understand previous contact with an individual.

Routine correspondence should not be retained indefinitely. Where particular information contained within correspondence needs to become part of a longer-term organisational record, the necessary information should be retained appropriately rather than preserving all of the surrounding correspondence solely for that reason.

10.5 Safeguarding and other formal records

Safeguarding records, complaints, accident and incident information, data breach records, financial records and other information maintained for a specific governance, legal or accountability purpose will be retained for the periods appropriate to those records as set out in Appendix A.

Where an unresolved matter requires relevant supporting information to be retained beyond its normal retention period, it may be retained for as long as reasonably necessary for that purpose.

10.6 Disposal

When personal information reaches the end of its retention period and there is no continuing reason to retain it, it should be securely deleted or disposed of.

Paper records containing personal or confidential information should be disposed of in a way which prevents the information from being readily recovered or read.

Autism Bucks does not require Trustees or volunteers to demonstrate forensic deletion of every temporary or cached copy created by ordinary use of their personal devices. The expectation is that identifiable working copies and locally stored records are deleted when they are no longer reasonably required.

10.7 Review and housekeeping

Autism Bucks will seek to use practical measures, including appropriate system settings or automated deletion where available, to reduce unnecessary retention of personal information.

Periodic housekeeping may also be undertaken where necessary, but the Charity will aim to avoid creating retention arrangements which depend upon extensive manual administration by volunteers.

11 Individual Rights

People whose personal information is held by Autism Bucks have rights in relation to that information under data protection law.

Autism Bucks will respond appropriately to requests concerning personal information it holds and will not require an individual to use particular legal terminology when making a request.

11.1 Requests for access

An individual may ask Autism Bucks what personal information the Charity holds about them and may request a copy of that information.

A request does not need to refer specifically to a "Subject Access Request" or to data protection legislation in order to be valid.

Where a Trustee or volunteer receives a request which appears to be asking for access to personal information held by the Charity, it should be passed promptly to the Chair or another appropriate Trustee rather than answered informally.

Autism Bucks will make reasonable and proportionate searches of the Charity systems and records likely to contain the individual's personal information.

Information may be held in more than one place, including membership records, Charity email accounts, correspondence, event records and other organisational records. The fact that information is not contained in the central membership record does not necessarily mean that it is not held by Autism Bucks.

Relevant information may be held in more than one Charity system, including Charity email. Autism Bucks will make reasonable searches of the systems likely to contain information falling within the request.

11.2 Information about other people

Records relating to one individual may also contain personal or confidential information about somebody else.

Autism Bucks will consider the rights and confidentiality of other people when responding to an information request and may redact, withhold or otherwise protect third-party information where appropriate.

11.3 Correction of information

Individuals may ask Autism Bucks to correct personal information which is inaccurate or to update information which has changed.

Autism Bucks will make reasonable corrections to information brought to its attention and, where necessary, consider whether the same information also needs updating in another Charity system.

11.4 Deletion of information

An individual may ask Autism Bucks to delete personal information held about them.

Where there is no continuing reason for the Charity to retain the information, it will be deleted. A request to delete ordinary membership information will normally be treated as ending the individual's Autism Bucks membership.

The right to deletion is not absolute. Autism Bucks may retain particular information where there remains a legitimate legal, safeguarding, financial, governance or other reason for doing so. Where appropriate, the individual will be informed that information has been retained and why.

11.5 Other rights and requests

Individuals may have other rights in relation to the way their personal information is used, including rights to restrict or object to particular processing.

Any request concerning the use of personal information which a Trustee or volunteer is unsure how to handle should be referred promptly to the Chair or another appropriate Trustee.

11.6 Identity and security

Autism Bucks may take reasonable steps to confirm the identity of a person making a request where this is necessary to avoid disclosing personal information to the wrong person.

Any identity information requested for this purpose should be limited to what is reasonably necessary and should not itself be retained unnecessarily.

11.7 Responding to requests

Autism Bucks will deal with requests within the timescales required by data protection law.

The Charity will aim to deal with requests openly, helpfully and without unnecessary formality while ensuring that information is disclosed only to people entitled to receive it.

12 Data Breaches

Autism Bucks takes reasonable steps to protect personal information, but recognises that mistakes, losses or security incidents can occur.

A personal data breach may include personal information being accidentally or unlawfully lost, destroyed, altered, disclosed to the wrong person, accessed without authority or otherwise made unavailable or insecure.

12.1 Reporting a suspected breach

Trustees and volunteers should report a suspected personal data breach promptly to the Chair or, where appropriate, another Trustee.

They are not expected to decide whether an incident meets the legal definition of a reportable data breach before raising it. Where there is doubt, it is better to report the concern so that it can be considered.

Where possible, reasonable immediate steps should be taken to limit further disclosure, loss or harm, provided that doing so does not risk making the situation worse.

12.2 Assessing and responding to a breach

Autism Bucks will consider the circumstances of a suspected breach, including the information involved, the people who may be affected, the possible consequences and any steps which can reasonably be taken to reduce the risk.

Where required by data protection law, Autism Bucks will notify the Information Commissioner's Office and/or affected individuals within the applicable timescales.

The Charity will not assume that every mistake involving personal information requires external reporting. The need for notification will be considered according to the nature and risk of the particular incident.

12.3 Data Breach Log

Autism Bucks will maintain a Data Breach Log containing a proportionate record of personal data breaches identified by the Charity, including breaches which do not require notification to the Information Commissioner's Office.

The record should contain sufficient information to establish what happened, the personal information affected, the action taken, the outcome of any assessment about notification, and any measures introduced to reduce the likelihood of recurrence.

The Data Breach Log should not contain unnecessary personal information or reproduce correspondence or other material where a concise factual record is sufficient.

12.4 Learning from incidents

The purpose of recording and reviewing data breaches is not to apportion blame for genuine mistakes.

Autism Bucks will consider whether an incident identifies a practical improvement which could reduce future risk. Any response should be proportionate to the nature of the incident and the Charity's circumstances.

Where an incident demonstrates that a particular practice creates an unnecessary risk to members' personal information, Autism Bucks will consider changing that practice rather than relying solely upon individuals to avoid repeating the same mistake.

13 Security and Personal Devices

Autism Bucks takes reasonable and proportionate measures to protect the personal and confidential information it holds against unauthorised access, loss, disclosure or misuse.

The Charity recognises that its arrangements must reflect the way Autism Bucks actually operates as a small organisation run entirely by volunteers.

13.1 Personal devices

Autism Bucks does not provide computers, mobile phones or other devices. Trustees and volunteers therefore use their own personal devices when carrying out Charity activities.

When accessing Autism Bucks accounts or personal information, Trustees and volunteers are expected to take reasonable precautions to prevent other people from gaining unauthorised access.

Autism Bucks does not seek to control or prescribe the general configuration or use of privately owned devices. Its expectations relate to the protection of Charity accounts and information when those devices are used for Autism Bucks purposes.

13.2 Accounts and passwords

Accounts provided for Autism Bucks purposes are organisational resources, including accounts which are allocated to and named after individual Trustees.

Login details should be protected against inappropriate access and should not be disclosed unnecessarily.

Where a service allows individual accounts to be provided, these should normally be used in preference to unnecessarily sharing a single account between multiple people.

Some Autism Bucks systems necessarily use shared or organisational credentials. The Charity may also maintain controlled access to credentials for succession and business-continuity purposes.

Security arrangements should therefore protect accounts against unauthorised access without making important Charity systems dependent upon the continued availability of a single individual.

13.3 Authentication and system security

Autism Bucks will use reasonable security measures provided by its principal systems and services, including appropriate authentication controls where available.

Where security measures can reasonably be managed centrally by the Charity, Autism Bucks will prefer this approach rather than placing unnecessary technical responsibilities upon individual Trustees or volunteers.

Devices used to access Charity information should have the normal security protections reasonably expected of a personal device, including protection against casual unauthorised access and appropriate software and security updates.

13.4 Downloading and storing information

Personal information should not be downloaded, copied or retained on personal devices unless there is a reasonable Charity purpose for doing so.

Temporary or working copies may be used where necessary, but information which Autism Bucks needs to retain should be stored in the appropriate Charity-controlled system.

Particular care should be taken before downloading or creating local copies of membership information or other collections of personal data.

13.5 Loss or compromise

A Trustee or volunteer who believes that a device, account or password used for Autism Bucks purposes has been lost, compromised or accessed by somebody without authority should inform the Chair or another appropriate Trustee promptly where Charity information may be at risk.

Any resulting personal data breach will be handled in accordance with the Data Breach provisions of this Policy.

13.6 Proportionate expectations

Autism Bucks does not expect Trustees or volunteers to be information technology or cyber-security specialists.

The Charity will aim to make its systems reasonably secure and straightforward to use and to provide practical guidance where necessary. Trustees and volunteers are expected to exercise reasonable care rather than to meet technical standards which would be disproportionate to their voluntary roles.

14 Responsibilities

Everyone handling personal information on behalf of Autism Bucks has a responsibility to treat that information appropriately. The level of responsibility will depend upon the individual's role and the information they need to use.

14.1 Trustees

The Trustees have collective responsibility for ensuring that Autism Bucks handles personal information appropriately and complies with its data protection responsibilities.

Trustees are expected to follow this Policy when carrying out Charity activities, to exercise reasonable judgement when handling personal or confidential information, and to raise concerns where they become aware of a potential data protection or security issue.

Trustees are not expected to become specialists in data protection law. Where a Trustee is uncertain about how personal information should be handled, they should seek advice from the Chair or another appropriate Trustee rather than making assumptions about what is required.

14.2 Chair

The Chair will normally coordinate Autism Bucks' day-to-day data protection arrangements, including responding to requests concerning personal information, considering suspected data breaches and overseeing the practical implementation of this Policy.

This does not make data protection the sole responsibility of the Chair or remove the collective responsibility of the Trustees.

Where a matter concerns the Chair, or the Chair is unavailable or otherwise unable to deal with it appropriately, another Trustee should take responsibility for the matter.

14.3 Volunteers

Volunteers are responsible for handling any personal information they receive through their Autism Bucks role with reasonable care and confidentiality.

Volunteers should not seek access to member information which they do not need for their role. Where personal information is provided to them for a particular activity or purpose, it should be used only for that purpose and should not be retained unnecessarily afterwards.

A volunteer who receives an information request, becomes aware of a suspected data breach, or has another concern about the handling of personal information should refer the matter promptly to a Trustee.

14.4 Changes of role and departure

When a Trustee or volunteer leaves Autism Bucks or changes role, access to Charity systems and information should be reviewed and removed where it is no longer required.

Where appropriate, this should include closing or transferring Charity accounts, preserving organisational information which Autism Bucks needs to retain, removing access to Charity-controlled communication groups and reviewing any shared credentials to which the individual had access.

Trustees and volunteers leaving the Charity should delete personal or confidential Autism Bucks information retained on their own devices once any information which the Charity needs has been appropriately transferred or preserved.

14.5 Training and guidance

Autism Bucks will provide practical guidance to Trustees and volunteers where this is reasonably necessary for their roles.

Training and guidance should be proportionate to the nature of the Charity, the information being handled and the responsibilities of the individual. Autism Bucks does not require volunteers to undertake unnecessary formal training simply for the purpose of demonstrating compliance.

15 Lawful Basis for Using Personal Information

Autism Bucks will only collect, use, store or share personal information where there is an appropriate lawful basis for doing so.

The appropriate basis depends upon why the information is being used. Autism Bucks does not rely upon a single lawful basis for all of its activities.

15.1 Legitimate interests

Much of the personal information used by Autism Bucks is necessary for the ordinary operation of the Charity and its relationship with members, Trustees, volunteers and others who interact with it.

Autism Bucks may rely upon its legitimate interests where it is reasonably necessary to administer the Charity, manage membership, organise activities, respond to enquiries, maintain appropriate organisational records or carry out other activities consistent with its charitable purposes.

When relying upon legitimate interests, Autism Bucks will consider the purpose for which the information is needed, whether its use is necessary and proportionate, and the reasonable interests and expectations of the individual concerned.

15.2 Legal and regulatory obligations

Autism Bucks may process personal information where this is necessary to comply with a legal or regulatory obligation.

This may include information required for financial and accounting purposes, Charity Commission requirements, safeguarding responsibilities or other obligations applying to the Charity.

15.3 Consent

Autism Bucks may rely upon consent where an individual is offered a genuine choice about whether their information is used for a particular purpose.

Consent is particularly relevant where Autism Bucks seeks permission to use an identifiable photograph or where an individual voluntarily chooses to participate in an activity requiring a particular use of their information.

Where processing relies upon consent, an individual may withdraw that consent. Withdrawal does not make earlier use of the information unlawful but Autism Bucks will respect the withdrawal in relation to future use.

15.4 Vital interests and emergencies

In exceptional circumstances, personal information may be used or shared where this is necessary to protect someone's life or respond to a serious and immediate risk of harm.

Autism Bucks is not a first responder and does not assume ongoing responsibility for members' welfare. This does not prevent the Charity from using or sharing relevant information where circumstances require an immediate and proportionate response to protect an individual.

15.5 Special category information

Some information handled by Autism Bucks, particularly information concerning health, disability or autism, may be special category personal data and therefore requires additional protection under data protection law.

Autism Bucks will only use special category information where there is both an appropriate lawful basis for using personal information generally and an applicable legal condition permitting the use of special category information.

The appropriate condition will depend upon the circumstances and purpose for which the information is being used. Autism Bucks will not assume that an individual's voluntary disclosure of sensitive information automatically permits that information to be used for any purpose.

15.6 Lawful basis and individual rights

The lawful basis used by Autism Bucks may affect the rights which apply to particular information.

Where an individual makes a request concerning their personal information, Autism Bucks will consider the basis upon which the information is held and any rights or obligations which apply in the particular circumstances.

15.7 Practical application

Trustees and volunteers are not expected to determine the technical lawful basis or special category condition applying to individual pieces of information as part of their everyday activities.

Autism Bucks will maintain appropriate information about the lawful bases applying to its principal processing activities and will seek appropriate advice where an unusual or particularly sensitive situation requires it.

16 Accuracy and Keeping Information Up to Date

Autism Bucks will take reasonable steps to ensure that personal information is accurate where its accuracy matters to the purpose for which it is being used.

The Charity recognises that information about individuals and their circumstances can change and does not assume that information provided in the past will necessarily remain current indefinitely.

16.1 Member information

Members are encouraged to tell Autism Bucks when important information held about them changes, particularly where the change affects the Charity's ability to communicate with them or their participation in activities.

Where Autism Bucks is informed that information is inaccurate or has changed, the relevant Charity record should be updated where reasonably necessary.

Autism Bucks does not routinely require members to reconfirm all of their personal information simply to demonstrate that its records have been reviewed.

16.2 Information held in more than one system

Some information, particularly names and contact details, may legitimately be held in more than one Autism Bucks system for different purposes.

Where a change is brought to the Charity's attention, reasonable steps should be taken to update other relevant systems where necessary.

Autism Bucks does not require every historical document, email or record containing previously accurate information to be retrospectively altered merely because an individual's circumstances have subsequently changed.

16.3 Information provided by others

Where personal information has been provided by somebody other than the individual concerned, Autism Bucks will take reasonable account of the source and context of that information.

Information reported, alleged or expressed as an opinion should not be presented in Charity records as though it were an established fact.

Where accuracy is disputed and the distinction matters, the record should make clear that the information is disputed rather than Autism Bucks making an unsupported judgement about which account is correct.

16.4 Historic records

Some records legitimately describe circumstances as they existed at a particular time, including Trustee minutes, safeguarding records, complaints and incident records.

Such records should not normally be rewritten simply because circumstances later change. Where a material correction or subsequent development is necessary to understand the record properly, an appropriate additional note or update may be made while preserving the integrity of the original record.

17 Paper Records

Most personal information held by Autism Bucks is stored electronically. The Charity nevertheless recognises that personal or confidential information may occasionally exist in paper form.

17.1 Use of paper records

Autism Bucks will create or retain paper records containing personal information only where there is a reasonable operational, governance, financial, safeguarding or other Charity purpose for doing so.

Paper records should not be created merely to duplicate information already held appropriately in an electronic Charity system.

17.2 Storage

Paper records containing personal or confidential information should be kept with reasonable regard to their sensitivity and the risk of unauthorised access.

Autism Bucks does not maintain premises or central physical filing facilities. Trustees or volunteers who temporarily hold paper records should therefore take reasonable care to prevent them from being unnecessarily accessible to other people.

The Charity does not require volunteers to provide dedicated filing facilities or to adopt disproportionate physical security measures within their own homes.

17.3 Working papers

Temporary paper copies, notes, attendee information or other working material may sometimes be useful in delivering an Autism Bucks activity.

Where such material contains personal information, it should be retained only for as long as it is reasonably needed and should not automatically become part of the Charity's permanent records.

Where information from a temporary paper record needs to be retained by Autism Bucks, the necessary information should be transferred to the appropriate organisational record where practicable.

17.4 Accident and other formal records

Paper records which have a specific operational or governance purpose, including an Accident Book or any other record which Autism Bucks is required or has decided to maintain in paper form, should be retained in accordance with the applicable retention period in Appendix A.

17.5 Disposal

Paper containing personal or confidential information should be disposed of in a way which prevents the information from being readily read or recovered.

This does not require a formal destruction service for routine Charity paperwork. Shredding or another reasonably secure method of destruction is sufficient where appropriate.

17.6 Historic paper records

Historic paper records should not be retained indefinitely merely because they have existed for a long time.

Where an historic record no longer serves a genuine Charity purpose, Autism Bucks will dispose of it appropriately. Where part of a record has continuing organisational value, the Charity may preserve that information in a more appropriate form without retaining unnecessary personal information.

18 Review and Approval

This Policy will be reviewed periodically to ensure that it continues to reflect the way Autism Bucks operates and remains appropriate to the Charity's activities and responsibilities.

18.1 Policy review

The Trustees will review this Policy at least every two years, or sooner where there is a significant change in the Charity's activities, systems, legal obligations or the way in which personal information is handled.

A review does not necessarily require the Policy to be changed. Where the Trustees are satisfied that it remains appropriate, the existing Policy may continue without amendment and the review should simply be recorded.

18.2 Appendices

The Appendices contain operational information which may need to change more frequently than the main Policy, including the Data Retention Schedule and details of the principal systems and third-party services used by Autism Bucks.

The Appendices may be updated between formal Policy reviews where necessary to reflect changes in systems, services, retention arrangements or other operational matters, provided that the changes remain consistent with the principles and requirements of this Policy.

Material changes to the Charity's approach to data protection should be considered by the Trustees and should not be treated merely as administrative amendments to an Appendix.

18.3 Approval

This Policy and any material amendments to it must be approved by the Trustees and the approval recorded in the minutes of the relevant Trustee meeting.

The Policy will record its version number, date of approval and next scheduled review date.

18.4 Availability

This Policy will be made available to Trustees and volunteers and may be published on the Autism Bucks website.

Autism Bucks may also provide shorter privacy information or notices where appropriate to explain how personal information is used in particular circumstances.

Appendix A — Data Retention Schedule

The periods below are the standard retention periods adopted by Autism Bucks. Information may be deleted or anonymised earlier where it is no longer required.

Information may be retained for longer where there is a specific and continuing reason to do so, including an unresolved safeguarding matter, complaint, legal or regulatory issue, insurance claim or other circumstance in which deletion would be inappropriate. Where information falls within more than one category, the longest applicable period may be applied where necessary.

Record	Normal retention period
Current member record, including information about a member's circumstances, needs or conditions	Duration of membership
Newsletter/member communications record	Duration of membership
Accepted membership application and associated processing correspondence	6 months after acceptance
Rejected membership application and associated processing correspondence	12 months after decision
Routine member correspondence, general enquiries and enquiries concerning another person	2 years
Event applications, booking information, named attendance records and event-specific personal information	6 months after the event
Identifiable survey responses	12 months after analysis or reporting is completed
Volunteer Interest Form	6 months after receipt
Current Trustee or volunteer administrative/contact information	Duration of role
Routine former Trustee or volunteer administrative/contact information	12 months after leaving
DBS certificate or copy, if ever retained by Autism Bucks	Normally no longer than 6 months after the relevant decision
Limited record that a DBS check was completed	Duration of role plus 12 months
Identifiable photographs held for Charity use	While there remains a genuine Charity purpose

Record	Normal retention period
Record of permission to use an identifiable photograph	For as long as the photograph continues to be used
Personal information submitted through an online form	According to the purpose for which the information was collected
Routine Zoom/member-session chat	Not intentionally retained after the session
Safeguarding Register and necessary supporting material	6 years after the concern is closed
Formal complaint and necessary investigation/response records	3 years after the complaint is closed
Accident Book or ordinary accident/incident record	3 years after the incident
Data Breach Log and necessary supporting material	3 years after the breach is closed
Annual accounts and Trustees' Annual Reports	Permanent organisational record
Bank statements, transaction records, invoices, receipts and other accounting records	6 years after the end of the relevant financial year
Gift Aid declarations and associated records	6 years after the end of the accounting period to which the last relevant donation relates
Grant applications, awards, agreements and reports forming a meaningful part of the Charity's funding history	Permanent organisational record
Supporting financial evidence required by a funder	Period required by the funding agreement, or applicable financial-record period if longer
Constitution and amendments, Trustee minutes and formal decisions, AGM records and Charity Commission submissions	Permanent organisational record
Approved policies and procedures	Current version plus superseded versions of organisational significance

Record	Normal retention period
Conflicts of interest declarations and separate records	6 years after the relevant Trustee leaves office, unless incorporated into permanent minutes
Insurance policies and related documentation	6 years after expiry
Succession Planning and operational continuity information	While current and organisationally useful
Website/security logs, cookie records, automated system histories and backups	According to genuine operational/security need and appropriate system or platform-managed retention settings

Anonymous or non-personal information, including attendance totals, survey statistics, feedback summaries, safeguarding or complaint statistics, organisational learning and information about the Charity's activities and outcomes, may be retained for as long as it remains organisationally useful.

Where a record relates to an unresolved legal, regulatory, safeguarding, insurance or similar matter, it may be retained until that matter is concluded and for any longer period applicable to the resulting record.

Historic personal information which no longer serves a genuine Charity purpose should be securely deleted or disposed of. Information should not be retained merely because it may conceivably be useful in the future.

Backups are maintained for recovery rather than archival purposes. Personal information contained in a backup may therefore remain until that backup expires through the normal backup cycle.

Where permission to use an identifiable photograph is withdrawn, Autism Bucks will stop future use to the extent that the withdrawal applies and remove the photograph from current Charity-controlled publications or channels where reasonably practicable. Historic publications do not necessarily need to be recreated or destroyed.

Appendix B — Principal Systems and Third-Party Services

Autism Bucks uses third-party systems and services in carrying out its activities. The table below identifies the principal systems through which personal information is routinely collected, stored, communicated or otherwise processed.

The Charity's Succession Planning document contains more detailed operational information about these and other services. This Appendix is not intended to provide a complete inventory of every organisation with which Autism Bucks interacts.

System or provider	Principal use
Microsoft 365	Charity document storage and administration, including SharePoint, OneDrive, Outlook, Power Apps and Power Automate. SharePoint contains the principal member record.
HostingUK	Website hosting, organisational email accounts and associated services.
WordPress / WPForms	Charity website and collection of information submitted through online forms, including membership applications, volunteer enquiries, contact forms and event registrations.
Newsletter	Member, Trustee and volunteer mailing lists and distribution of Charity communications.
CookieYes	Management of website cookie choices and consent information.
Zoom	Online member sessions, Trustee meetings and other online meetings.
uCheck	Administration of DBS checks for Trustees and relevant volunteers.
WhatsApp	Operational communications between Trustees and volunteers and, where appropriate, individual communications relating to Charity activities.
TTNC	Provision and routing of the Charity's telephone number.
Charity Commission	Statutory Charity and Trustee information and regulatory submissions.
HMRC	Tax administration, including Gift Aid and Corporation Tax.
Co-operative Bank	Charity banking and financial administration.
JustGiving / Charities Aid Foundation	Processing donations and, where applicable, Gift Aid information on behalf of Autism Bucks.

System or provider	Principal use
Artificial intelligence services	Assistance with drafting, summarising, research and administrative tasks. Personal information is used only in accordance with section 8.3 of this Policy.

Autism Bucks may use other third-party organisations or services where necessary for its activities. Before introducing a new service which will routinely process significant personal information, the Charity will consider whether the service is appropriate and whether this Appendix or its data protection arrangements need to be updated.

Individual user accounts, passwords, access credentials, telephone routing, named administrators and other security or succession information are maintained separately in appropriate Charity records.

Appendix C — Principal Processing Activities and Lawful Bases

This Appendix records the principal recurring purposes for which Autism Bucks uses personal information and the lawful bases which normally apply. It is not intended to describe every individual use of personal information. Where circumstances are unusual, particularly sensitive or materially different from those described below, the appropriate lawful basis and any special category condition should be considered separately.

Processing activity	Purpose	Normal lawful basis	Special category condition where applicable
Membership administration	Maintain the member record, communicate with members and administer membership	Legitimate interests	Support for individuals with a particular disability or medical condition, where applicable
Member communications and newsletter	Provide information about Autism Bucks activities, events and matters relevant to members	Legitimate interests	Not normally applicable
Event and activity administration	Manage bookings, attendance, accessibility, dietary requirements, transport and other practical arrangements	Legitimate interests	Support for individuals with a particular disability or medical condition, where applicable
General enquiries and correspondence	Respond to people contacting Autism Bucks and maintain proportionate records of relevant correspondence	Legitimate interests	Depends on the information and circumstances
Trustee and volunteer administration	Recruit, communicate with and administer Trustees and volunteers and manage appropriate access to Charity systems	Legitimate interests; legal obligation where applicable	Depends on the information and purpose
DBS checks	Undertake appropriate checks for relevant Trustee and volunteer roles	Legitimate interests; legal obligation where applicable	Consider separately where special category or criminal offence information is involved

Processing activity	Purpose	Normal lawful basis	Special category condition where applicable
Safeguarding and serious welfare concerns	Record, assess and respond appropriately to concerns and, where necessary, share relevant information	Recognised legitimate interests, legitimate interests, legal obligation or vital interests, depending on the circumstances	Safeguarding of individuals at risk, vital interests or another applicable condition, depending on the circumstances
Complaints, accidents, incidents and data breaches	Investigate, respond to and maintain appropriate accountability records	Legitimate interests; legal obligation where applicable	Depends on the information and circumstances
Photographs and identifiable images	Use identifiable photographs in Charity communications, publicity or other agreed purposes	Consent	Explicit consent where the processing itself involves special category information
Donations and Gift Aid	Process donations, maintain financial records and administer Gift Aid	Legitimate interests; legal obligation where applicable	Not normally applicable
Financial, governance and regulatory administration	Maintain accounts and governance records and meet Charity, tax and other regulatory requirements	Legal obligation; legitimate interests where applicable	Not normally applicable
Website and information-system security	Operate and protect the Charity's website, accounts, systems and information	Legitimate interests	Not normally applicable
Emergency response	Use or disclose relevant information where necessary to respond to an immediate and serious risk to an individual	Vital interests or legitimate interests, depending on the circumstances	Vital interests or another applicable condition, depending on the circumstances

Processing activity	Purpose	Normal lawful basis	Special category condition where applicable
Membership administration	Maintain the member record, communicate with members and administer membership	Legitimate interests	Not-for-profit bodies, where applicable
Member communications and newsletter	Provide information about Autism Bucks activities, events and matters relevant to members	Legitimate interests	Not normally applicable
Event and activity administration	Manage bookings, attendance, accessibility, dietary requirements, transport and other practical arrangements	Legitimate interests	Not-for-profit bodies, where applicable
General enquiries and correspondence	Respond to people contacting Autism Bucks and maintain proportionate records of relevant correspondence	Legitimate interests	Depends on the information and circumstances
Trustee and volunteer administration	Recruit, communicate with and administer Trustees and volunteers and manage appropriate access to Charity systems	Legitimate interests; legal obligation where applicable	Depends on the information and purpose
DBS checks	Undertake appropriate checks for relevant Trustee and volunteer roles	Legitimate interests; legal obligation where applicable	Consider separately where special category or criminal offence information is involved
Safeguarding and serious welfare concerns	Record, assess and respond appropriately to concerns and, where necessary, share relevant information	Legitimate interests, recognised legitimate interests or vital interests, depending on circumstances	Safeguarding of individuals at risk, vital interests or another applicable condition, depending on circumstances
Complaints, accidents,	Investigate, respond to and maintain appropriate accountability records	Legitimate interests; legal obligation where applicable	Depends on the information and circumstances

Processing activity	Purpose	Normal lawful basis	Special category condition where applicable
incidents and data breaches			
Photographs and identifiable images	Use identifiable photographs in Charity communications, publicity or other agreed purposes	Consent	Explicit consent where the photograph itself reveals special category information and this is relevant to the processing
Donations and Gift Aid	Process donations, maintain financial records and administer Gift Aid	Legal obligation and/or legitimate interests, depending on purpose	Not normally applicable
Financial, governance and regulatory administration	Maintain accounts and governance records and meet Charity, tax and other regulatory requirements	Legal obligation; legitimate interests where applicable	Not normally applicable
Website and information-system security	Operate and protect the Charity's website, accounts, systems and information	Legitimate interests	Not normally applicable
Emergency response	Use or disclose relevant information where necessary to respond to an immediate and serious risk	Vital interests or recognised legitimate interests, depending on circumstances	Vital interests or another applicable condition, depending on circumstances