What Data Do You Need?

A guide for small and new UK charities

to help audit your data needs

Summary

Effective organisations look after their resources: including their data. The first step is knowing what you have, and why. For new or changing organisations, you may need to think about what you'll need, too.

Mapping this out doesn't need to take a long time, but it is an essential first step to making sure you are complying with the law, and making the most of your data.

This is part one in our three-part guide to help smaller UK charities ensure they are looking after their data effectively. Each guide is accompanied by a workbook which you can use to record your responses and keep as part of your compliance records.

Disclaimer: This guide and the accompanying workbooks do not constitute legal advice and are not a substitute for your duty to meet your own data protection obligations. These resources are designed as a starting point to assist small and new UK charities in thinking about their legal obligations and practical data needs and are used at your own risk. You should seek advice from a lawyer or data protection professional for further assistance.

Introduction

Your mission is what drives you. You know you want to change the world in some way. That will be written down as charitable objectives and similar, but really, it's your shared passion that drives you.

If you're going to succeed, you'll need some stuff. Other people. Money. Time. Maybe premises and equipment. And so on.

One of the things you're going to need is data. At a bare minimum you'll have financial records and details of your trustees. More likely, you'll need information about beneficiaries, donors, supporters, volunteers, and so on.

You've probably given a fair amount of thought to where the financial and people and other resources you'll need will come from, and how you'll look after them. But it's easy to overlook data.

The reality is that without any data, you won't have much of the other resources you need either. Research shows that organisations that take care and think about their data are more successful. Why? It's a sign of a well-run organisation.

Like your other assets, you need to know what data you've got and where it is so that you can look after it properly. You probably don't keep your money in a cardboard box on the front desk or keep all the volunteer rotas in your head. You need to know what data you have, or are going to need.

What kinds of data?

We've been working with charities for almost 20 years and each one is unique. There's also lots in common, and we've distilled some of our experience into this guide and the accompanying workbook. It's a structure and a starting point for your thinking. You'll need to go through, adding and removing elements to reflect your current position. This workbook is primarily for information about people, because there are special rules about that – the Data Protection Act 2018 and the GDPR (General Data Protection Regulations. There's more about these in our second guide: “Lawful data: a guide for small and new UK charities”). You may want to add financial data and other organisational records and resources too.

Once you’ve done this you’ll be in a good position to start to ensure you are acting lawfully with your data, and that you’re storing it properly. We’ve got guides to help you get started with those bits too.

How to use this guide

This guide is structured around five questions:

1. Who is your data about?
2. What data do you need?
3. Why you need it?
4. Who in your organisations needs it?
5. What will you do with the data?

None of this should be too difficult. There’s plenty of common ground between charities around this, so the workbook we’ve created is structured with that in mind. You can update and build on it to reflect your own particular needs. The workbook can be downloaded with this guide from the email we sent you.

Once you’ve completed this, the next step will be to ensure you know that what you want to do is lawful. Again, this shouldn’t be too difficult, but you will almost certainly have to do it, and show you’ve done it – so write it down. Your trustees are likely to want some update on this too, as they have overall responsibility for your assets.

If you’ve subscribed to receive this, the next guide and workbook should arrive in about a week but give us a shout enquiries@lamplightdb.co.uk if not.

So, first things first, download the workbook, put in your own organisation name, and work through this guide and complete the workbook as you go.

In this guide, this icon tells you when it’s time to update your workbook.

Question 1: Who is your data about?

What are the categories of people about whom you'll need to store some information? You'll have lots of people involved in your charity in different ways, but there will be several broad groupings.

You need to think about the type of data you'll be needing about them, and why you need it. These define your categories. For example

> *"We need contact and limited demographics about trustees, so that the board can operate, and so that we can keep official records up to date".*

This is one category of data.

> *"We need contact and donation records for donors, so that we can claim Gift Aid, thank donors, and keep them up to date with our work."*

This is another category of data.

Here are some of the areas you'll need to think about. You may not need all of them, depending on what you do. Of course, one individual person may fall into more than one category – that's fine.

- **Legal** – trustees/ directors, members, company secretary
- '**Beneficiaries'** – in Charity Law, the people that benefit from your charity. You may call them something else, but they are the primary people your organisation exists to serve. But there may be others connected to your primary beneficiaries.
- **'Connected people'**. To effectively work with your primary beneficiaries, you may need to know about other people. For example, work with young people means you need to know parent/guardians or other family members; or other professionals involved with that person. It'll be worth listing these out separately, as it's likely you'll have different data and motivation for needing it.
- **Partners** – people at other organisations that you work with in some way – perhaps making or receiving referrals, for example.
- **Staff and Volunteers** (and applicants) – you'll need employment related information about them.

- **Donors** – individuals, or those connected to organisations (e.g. local companies) that give financial support.
- **Supporters** – other people that support your work, that you send information to.
- **Suppliers** – consultants or others who do work for you in some form.

In legal terms, these people are all ‘Data Subjects’ – you’ll see this in reference to the Data Protection Act and the GDPR.

In the workbook, we’ve added a table for each category. If one table doesn’t apply to you, delete it. If you need extra, there’s a blank one at the end that you can copy and paste for each additional category. Don’t worry about what’s in each of the tables yet, that’s next.

Question 2: What data do you need?

This is where you outline the types of information you may need to hold about someone. For most categories of people you'll probably need contact information. After that there will be more variety. Your equalities policy may mean that you need to collect demographic data about trustees, staff and beneficiaries, but not donors. If you do in-depth case work with individual beneficiaries, you'll need to store a lot of information about that.

You should only collect the data you need, no more and no less. This is because you have a duty to ensure that the data is adequate, relevant and limited to what is necessary.

Some broad categories you'll want to consider include:

- Contact information
- Demographic information (date of birth, ethnicity, gender etc)
- Personal circumstances, aspirations, or needs (background of beneficiaries)
- Services accessed
- Case work records
- Correspondence
- CVs and job applications
- DBS checks and safeguarding records
- Donations

For each of the categories you've got, go down the first column in the table and add the data categories that are relevant to you. Try to be specific about what data you are collecting, or intend to collect in the future.

Question 3: Why do you need it?

Why you need the data may seem obvious to you, but you need to be able to demonstrate that you've given this some thought. Mostly a sentence or two will be sufficient for now. But your reasons will be important when you come to making sure that you are handling data lawfully.

Why do you need the data you've listed out in steps 1 and 2?

Some of the common reasons are going to be:

- Organisational Management (e.g. trustees, members)
- Employment / HR (for staff and volunteers)
- Contract or regulatory (for Companies House / Charity Commission; or other contracts you've entered into)
- Safeguarding (DBS, incidents)
- Provision of services (you need to know something about the people you're working with)
- Fundraising (for supporter and donors)

Work through each of the tables in your workbook and identify the reason you need each category of data. The reasons given above are not exhaustive, and you will need to ensure that the reasons you give are directly relevant to your organisation and how you work.

Question 4: Who in your organisation needs it?

This can vary a lot between organisations, depending on what you do and the size and type of organisation you are. If you're providing counselling services you'll probably have different confidentiality requirements than if you're organising a community walking group.

These will also be different for different categories. The identity and some information about your trustees is publicly available on the Charity Commission website, for example. It may not be appropriate for your trustees to have access to individual information about beneficiaries. Some staffing information should be confidential to colleagues.

Again this may seem obvious, but it's not always, and it's always better to have identified and noted down any restrictions.

For now, you might want to use categories like these, with any clarifying notes as needed:

- Public information
- Any Internal (staff, volunteers, trustees)
- Limited Internal (only trustees; or limited staff)
- Limited External (partner agencies, suppliers, freelancers etc)

Much is likely to be Limited Internal. You may want to make brief notes as to who should have access in a bit more detail in the workbook.

Question 5: What will you do with the data?

In legal terms, how are you going to be processing people's data? Are you going to just send out an email newsletter, or will you be segmenting your list based on personal characteristics and sending different messages based on this? For most charities, you probably won't be getting into this, but you'll need to consider whether what you want to do is legitimate.

You may well need to provide aggregate reports on what you've done. How many people you've worked with in the year; and what impact that work has had, for example. These may be shared externally. You may need to report to trustees on fundraising performance. You may need to share personal information with other agencies to meet safeguarding or other responsibilities.

You don't need to go into a lot of detail here, but do note down a few words of what you'll be doing with people's information. The workbook includes some suggestions of the more common responses but you'll need to check them and update it for your circumstances.

Update the final column in the workbook. Think about all the different aspects of your organisation and how data is being used or is likely to be used.

You'll need to decide whether what you do with this data is legitimate. You will also need to think about what you tell people about what you are doing with their data. We'll get more into this in the second guide, but asking yourself "would the person (data subject) think this is OK if they knew what we're doing with their info?" is a good start here.

Next steps

This may all feel like quite a lot to do. If you haven't already, download our workbook, which will help to give you a head-start in organising and recording your thinking.

You should also check with your trustees what level of oversight they need. Do you just need to tell them you've done this, or do they want more involvement? Accountability and governance are an important part of complying with your data protection obligations.

Once you have this audit of your data, you'll need to do a bit more to satisfy the requirements of the GDPR. We've got a further guide to help you get started with this too. If you've signed up to our emails you'll get it in a week or so. Please drop us a line at enquiries@lamplightdb.co.uk if you've come across this some other way and would like the next bit.

Further in-depth information and guidance can be found on the Information Commissioner's Office website: www.ico.org.uk/