

Federation of Window Cleaners

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Formed in 1947 FWC is the Professional Federation for Window Cleaners

Data Protection Policy

Purpose

The Federation of Window Cleaners is committed to protecting the rights and privacy of individuals and to handling personal data responsibly. This policy sets out the organisation's approach to data protection and the standards expected of staff, Executive members, and others who handle personal information on its behalf.

Scope

This policy applies to all staff and Executive members at the Federation of Window Cleaners. Any breach of data protection requirements or this policy may be treated as a disciplinary matter.

As a matter of good practice, other individuals working with the Federation who have access to personal information are expected to read and comply with this policy, not copy data for further use, and sign an agreement to abide by the organisation's data protection requirements.

Staff who deal with external organisations are expected to ensure that those organisations agree to abide by this policy where appropriate.

Legal Framework

Personal data is protected by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy should be read alongside the organisation's legal obligations and relevant guidance from the Information Commissioner's Office.

The organisation recognises the need to process personal data lawfully, fairly, and transparently, and only for specified and legitimate purposes.

The organisation will maintain appropriate records relating to the personal data it holds and will support individuals in exercising their data protection rights, including the right of access.

Personal data may be processed where there is a valid lawful basis to do so, including for membership services, administration, communications, accounting, and other legitimate organisational purposes.

Managing Data Protection

The organisation will maintain appropriate governance arrangements for data protection compliance, including accountability for processing activities and registration with the Information Commissioner's Office where required.

Purposes for Which Data Is Held

Data may be held by the Federation of Window Cleaners for the following purposes:

1. Staff Administration
2. Realising the Objectives of an Employers Trade Association
3. Accounts & Records
4. Advertising, Marketing & Public Relations
5. Information and Databank Administration
6. Research
7. Processing For Not-for-Profit Organisations

Data Protection Principles

The Federation of Window Cleaners acts as a data controller where it determines the purposes and means of processing personal data. The following UK GDPR principles guide that approach:

1. Lawfulness, fairness and transparency

The organisation will make clear how personal data is collected, used, shared, and retained, and will ensure that processing is carried out on an appropriate lawful basis.

2. Purpose limitation

Personal data will be collected for specified, explicit, and legitimate purposes and will not be further processed in a way that is incompatible with those purposes, unless permitted by law.

3. Data minimisation

The organisation will ensure that the personal data it holds is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

4. Accurate and up to date

The organisation will take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate or outdated data will be corrected or deleted without undue delay where appropriate.

5. Storage limitation

Personal data will be kept in a form that permits identification for no longer than is necessary for the purposes for which it is processed, unless a longer retention period is required or permitted by law.

6. Integrity and confidentiality

Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical and organisational measures.

7. Accountability

The organisation is responsible for, and must be able to demonstrate, compliance with the data protection principles and its wider obligations under UK data protection law.

Individual Rights

Individuals whose personal data is processed by the Federation of Window Cleaners may have the right to request access to their personal data, request rectification or erasure, restrict or object to processing, request data portability where applicable, withdraw consent where consent is relied upon, and raise concerns with the Information Commissioner's Office.

Data Security

Appropriate technical and organisational measures will be taken to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, damage, or disclosure.

Company computers are protected by login controls, and the contact database is password protected so that only authorised staff can access personal data. Personal and financial data must be kept securely and accessed only by authorised personnel. Care should also be taken to ensure that personal data displayed on screens is not visible to unauthorised persons.

International Transfers

Personal data will not be transferred outside the United Kingdom unless the transfer is lawful and appropriate safeguards are in place in accordance with applicable data protection law.

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Effective Date

This policy is effective from 11th May 2026 and applies to matters occurring on or after that date.

Review and Version Control

This policy should be reviewed regularly, and whenever necessary, to ensure that it remains accurate, relevant, and aligned with current legal, regulatory, and operational requirements.

Version: 1.0

Policy owner: Federation of Window Cleaners

Last updated: 11 May 2026

Next review date: To be confirmed

Any amendments to this policy should be approved by the appropriate authority within the organisation and recorded in the version history.