



Charity Number: 1160538
Policy Documentation

DATA PROTECTION POLICY

Policy Reference	13
Status	Approved
Original Author	Advising Communities
Date Written	January 2018
Date Approved on	14 May 2018

1 Introduction

Organisations have a legal duty to ensure that the way they hold and process personal information is done so in accordance with the General Data Protection Regulations.

Eastcott Community Organisation, Savernake Street, (Off Eastcott Hill), Swindon, SN1 3LZ.

Registered Charity Number 1160538

This policy applies to all our employees, Trustees and volunteers.

2 Definitions

Term	Definition
Centre	The social hall managed by the Committee: Eastcott Community Centre, Savernake Street, Swindon, SN1 3LZ Telephone: 07599256969, e-mail: eastcottcommunity@yahoo.co.uk
Committee	The trustees who manage and run the Centre
Confidentiality	Confidential information is defined as verbal or written information, which is not meant for public or general knowledge, information that is regarded as personal by users, members, trustees, employees or volunteers.
Consent	of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
Data	includes information such as name, an identification number, location data including addresses, emails, phone numbers, online identifiers including IP addresses, information gathered by cookies or factors specific to the physical, physiological,



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Term	Definition
	genetic, mental, economic, cultural or social identity of that natural person (which could include CCTV). The GDPR reaches further than the current Data Protection Act. It is designed to take into account modern technology and the right of the data subjects to the protection of the personal data being held by an organisation about him/her.' Data is information stored: a) Electronically i.e. on computer, including word processing documents, emails, computer records, CCTV images, microfilmed documents, backed up files or databases, faxes and information recorded on telephone logging systems. b) Manually i.e. records which are structured, accessible and form part of a filing system where individuals can be identified and personal data easily accessed without the need to trawl through a file.
Data Controller	The person who (either alone or with others) decides what personal information we will hold and how it will be held or used.
Data Protection Act 1998	The UK legislation that provides a framework for responsible behaviour by those using personal information, which will be superseded by the General Data Protection Regulations on 25 May 2018.
Data concerning health	means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.
Data Subject	any living individual whose personal data is being processed. Examples include: employees – current and past volunteers apprentices job applicants donors service users/clients suppliers
'Explicit' consent	is a freely given, specific and informed agreement by an individual to the processing of personal information about them. Explicit consent is needed for processing sensitive data.
Hirer	The individual who has hired the centre



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Term	Definition
Hall users	Individuals who attend activities and events at the centre
Notification	Notifying the Information Commissioner about the data processing activities of the Organisation, as certain activities may be exempt from notification.
Information Commissioner	The UK Information Commissioner responsible for implementing and overseeing the General Data Protection Regulations.
Organisation	Eastcott Community Organisation
Processing	the use made of personal data including any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Processor	a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
Personal data	means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Personal data breach	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Trustee/ Volunteer with governance responsibilities	The person(s) responsible for ensuring that we follow our data protection policy and complies with the General Data Protection Regulations.

3 Why the policy exists

The Basics of General Data Protection Regulations 2018

The Data Protection Act 1998 gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly. The new General Data Protection Regulation come into effect in the UK on 25 May 2018, and will replace the Data Protection Act 1998.



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4 Scope

The Regulations works in a number of ways:

Firstly, it states that anyone who processes personal information must comply with eight principles, which make sure that personal information is:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

Secondly, the controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').

- 1. processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- 2. obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes;
- 3. adequate, relevant and not excessive in relation to those purpose(s);
- 4. accurate and, where necessary, kept up to date;
- 5. not kept for longer than is necessary;



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- 6. processed in accordance with the rights of data subjects under the Act;
- 7. kept secure by the Data Controller who takes appropriate technical and other;
- 8. measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information; and
- 9. not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

The second area covered by the Act provides individuals with important rights, including the right to find out what personal information is held on computer and most paper records. Individuals have the right to request to see their information, and to ask for their information to be amended or erased.

5 Responsibilities

Role	Responsibility
Trustees	Recognise their overall responsibility for ensuring that the Organisation complies with its legal obligations.
Trustee / Volunteer with governance responsibilities	Has the following responsibilities: Briefing the Trustees/Management Committee/Board on Data Protection responsibilities; Reviewing Data Protection and related policies; Advising other staff on Data Protection issues; Ensuring that Data Protection induction and training takes place; Handling subject access requests; Approving unusual or controversial disclosures of personal data; Ensuring contracts with Data Processors have appropriate data protection clauses; Electronic security; Ensuring that all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been disposed of or passed on/sold to a third party. Approving data protection-related statements on publicity materials and letters.
Each employee, trustee and volunteer	who handles personal data will comply with the Organisation's operational procedures for handling personal data (including induction and training) to ensure that good Data Protection practice is established and followed. All employees, trustees and volunteers are required to read, understand and accept any policies and



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Role	Responsibility
	procedures that relate to the personal data they may handle in the course of their work. Significant breaches of this policy will be handled under our disciplinary procedures.

6 Policy

As an organisation we need to collect and use certain types of information about the different people we come into contact with in order to carry out our work. This personal information must be collected and dealt with appropriately– whether on paper, in a computer, or recorded on other material. This policy applies to all personal and sensitive personal data. We will:

- comply with the General Data Protection Regulations in respect of the data we hold about individuals;
- respect individuals' rights;
- be open and honest with individuals whose data is held;
- ensure that everyone processing personal information understands that they are contractually responsible for following good data protection practice;
- protect the organisation's clients/service users, employees, volunteers and other individuals;
- provide training, support and supervision for employees and volunteers who handle personal data, so that they can act legally, confidently and consistently;
- regularly assess and evaluate our methods and performance in relation to handling personal information; and
- protect the organisation from the consequences of a breach of its responsibilities.

We recognise that our first priority under the General Data Protection Regulations is to avoid causing harm to individuals. Information about employees, volunteers and clients/service users will be used fairly, securely and will not be disclosed to any person unlawfully.

Secondly, the Regulations aim to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, we will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

6.1 Disclosure

We may share data with other agencies such as our financial accountant or Website Manager.

The Data Subject will be made aware of how and with whom their information will be shared. There are circumstances where the law allows us as an organisation to disclose data (including sensitive data) without the data subject's consent.



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These are:

1. Processing carried out by individuals purely for personal or household activities including correspondence and the holding of addresses or social networking and online activity undertaken within the context of these activities;
2. Processing covered by the Law Enforcement Directive;
3. Processing for national security.

We regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

6.2 Data Controller

The Organisation is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

7 Confidentiality

Because confidentiality applies to a much wider range of information than Data Protection, we have a separate Confidentiality Policy. This Data Protection Policy should be read in conjunction with the Confidentiality Policy.

In order to provide some services, we will need to share client's personal data with other agencies (Third Parties). Verbal or written consent will always be sought from the client before data is shared.

Where anyone within our organisation feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done after discussions with a manager or Trustee / Volunteer with governance responsibilities. All such disclosures will be documented.

8 Security

This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.

Any recorded information on hirers, hall users, volunteers and employees will be:

- Kept in locked cabinets or general server, or cloud
- Protected by the use of passwords if kept on computer or encrypted if appropriate
- Destroyed confidentially if it is no longer needed, or if an individual requests

Access to information on the main database is controlled by a password and only those needing access are given the password. Employees, trustees and volunteers should be careful about information that is displayed on their computer screen and make efforts to ensure that no unauthorised person can view the data when it is on display.



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Notes regarding personal data of hirers/hall users should be shredded or destroyed.

9 Data Recording and storage

We have a single database holding basic information about all clients and volunteers. The back-up copies of data are kept in a safe place.

We will regularly review our procedures for ensuring that our records remain accurate and consistent and, in particular:

- We will keep records of how and when information was collected.
- The database system is reviewed and re-designed, where necessary, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in a single place as set out in our action plan, and all employees, trustees and volunteers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures are in place so that all relevant systems are updated when information about any individual changes. Effective procedures are also in place to address requests from data subjects for access to, amendments or the erasure of their information
- Employees, trustees and volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping in compliance with the GDPR.
- Data will be corrected if shown to be inaccurate.

We store archived paper records of hirers/hall users and volunteers securely in the office.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

10 Access to data

Information and records will be stored securely and will only be accessible to authorised employees and volunteers, and the individual to whom the information relates.

All clients and customers have the right to request access to all information stored about them. Any subject access requests will be handled by Trustee / Volunteer with governance responsibilities within the required time limit.

Subject access requests must be in writing or by email. All employees, trustees and volunteers are required to pass on anything which might be a subject access request to Trustee / Volunteer with governance responsibilities without delay. In accordance with the GDPR, we will provide personal data in a 'commonly used and machine readable format.' We also recognise the right of the individual to transfer this information to another Controller.

Where the individual making a subject access request is not personally known to Trustee / Volunteer with governance responsibilities their identity will be verified before handing over any information.



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The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

We will provide details of information to service users who request it unless the information may cause harm to another person.

Employees have the right to access their file to ensure that information is being used fairly. If information held is inaccurate, the individual must notify the Manager so that this can be recorded on file.

11 Transparency

We are committed to ensuring that in principle Data Subjects are aware that their data is being processed and:

- for what purpose it is being processed;
- what types of disclosure are likely; and
- how to exercise their rights in relation to the data.

Data Subjects will generally be informed in the following ways:

- Employees: in the staff terms and conditions
- Volunteers: in the volunteer welcome/support pack
- Trustees: in the roles and responsibilities/support pack
- Hires/Hall Users: when they provide their information and consent to retain it is requested, or when they request (on paper, online or by phone) services

Standard statements will be provided to all staff for use on forms where data is collected.

Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.

12 Consent

Because confidentiality applies to a much wider range of information than Data Protection, we have a separate Confidentiality Policy. This Data Protection Policy should be read in conjunction with the Confidentiality Policy.

In order to provide some services, we will need to share client's personal data with other agencies (Third Parties). Verbal or written consent will always be sought from the client before data is shared.

Where anyone within our organisation feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done after discussions with a manager or Trustee / Volunteer with governance responsibilities. All such disclosures will be documented.



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13 Privacy Notice

The Organisation has a Privacy notice see Appendix A. This explains what to expect when the organisation collects personal information. It will be available on the website, in email signatures and referenced in all booking communication. Hirers will be asked to acknowledge that they have read it along with the booking terms and conditions before the booking will be accepted.

14 Direct marketing

We will treat the following unsolicited direct communication with individuals as marketing:

- seeking donations and other financial support;
- promoting any of our services;
- promoting our events;
- promoting membership to supporters;
- promoting sponsored events and other fundraising exercises;
- marketing on behalf of any other external company or voluntary organisation.

Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be asked to provide their consent. We do not have a policy of sharing lists, obtaining external lists or carrying out joint or reciprocal mailings.

We will only carry out telephone marketing where consent has been given in advance, or the number being called has been checked against the Telephone Preference Service.

Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.

15 Staff training and acceptance of responsibilities

All employees that have access to any kind of personal data will be given copies of all relevant policies and procedures during their induction process, including the Data Protection policy, Confidentiality policy and the operational procedures for handling personal data. All staff will be expected to adhere to all these policies and procedures.

Data Protection will be included in trustee training and the induction training for all volunteers.

We will provide opportunities for all staff to explore Data Protection issues through training, team meetings, and supervisions.

16 Policy review

This policy will be reviewed and updated as necessary in response to changes in relevant legislation, contractual arrangements, and good practice or in response to an identified failing in its effectiveness.

In case of any queries in relation to this policy please contact our Trustee / Volunteer with governance responsibilities.



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17 Associated Policies

Policy Name	Policy Ref
Confidentiality Policy	25

External References

The full text of GDPR is found here, and Article 13 can be found on page 40:

http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

GDPR – a guide for charities

[http://www.cfg.org.uk/resources/Publications/~media/Files/Resources/CFDG%20Publications/CFG266 Data protection.pdf](http://www.cfg.org.uk/resources/Publications/~media/Files/Resources/CFDG%20Publications/CFG266_Data_protection.pdf)

ICO

<https://ico.org.uk/global/contact-us/advice-service-for-small-organisations/>

18 Version Control

Version	2.2	Date created on	5 February 2018
Rational for changes	Transfer to new template and adopt Advising Communities Policy		
	2.2 Update name of community centre to Eastcott Community Centre		
	Review policy and update table of data		
Status	Approved		
Revision Author	Jo Innes		
Date Approved On	14 May 2018	Review Date	Annual
Approved By: Committee			
Name	Role	Date of signature	
		14 May 2018	



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19 Appendix A

Privacy Notice

Data Protection Law changed on 25 May 2018

The General Data Protection Regulations come into effect in the UK from 25 May 2018, replacing the Data Protection Act 1998.

This Privacy Notice sets out most of your rights under the new laws. As the Regulations come into effect and the Information Commissioners Office (ICO) update their rules and best practice, we will continually update this Notice.

Who we are

Eastcott Community Organisation is a registered charity (number 1160538) and its committee of volunteers are mostly local residents. Our objective is to increase opportunities for those living in and around Eastcott, by managing a community centre, Eastcott Community Centre, and organising events and activities. We are a group without political or religious affiliation.

Collection of your Personal Information

Eastcott Community Organisation may collect and use the following kinds of personal information:

- Data relating to your volunteering or work with us, including referee's data, including applicants and referees' name, address, email address and telephone number/s.
- Contact details related to your membership of Eastcott Community Organisation.
- Contact details related to our communication with you whether you are an individual, business, charity or other organisation.
- Information about your use of their website including information obtained via cookies
- Information that you provide during the use of their services/registration process including your name, email address and telephone number for the purpose of making electronic bookings for services on their website
- Information about electronic bookings for services made via their website including dates, times and locations of appointments
- Information that you provide for the purpose of feedback on their website and on any service provided by Eastcott Community Organisation and any other information that you send to Eastcott Community Organisation



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We are collecting data on the following legal bases:

- We have your consent
- Processing is necessary for the performance of a contract or to take steps to enter into a contract
- Processing is necessary for compliance with a legal obligation
- Processing is necessary to protect your vital interests
- Necessary for the purposes of legitimate interests pursued by our organisation or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

If you have any questions about the collection and storage of your Personal Information, please contact us at eastcottcommunity@yahoo.co.uk

Using Personal Information

Eastcott Community Organisation may use your personal information to:

- enable us to contact you related to volunteering, work or as a Member of our organisation, and afterwards as necessary to demonstrate compliance with our policies and governing document. **We will ask for your consent to store personal data related to volunteering with us or becoming a member of our organisation.**
- contact you regarding a service that you may or are providing for us, to respond to an enquiry, and retain this information afterwards to comply with our policies, enable us to run our charitable business or due to any legal or recommended requirements to retain documentation (eg a paper trail for financial transactions). **We will store this data as we believe we have a legitimate interest to do so in order to run our organisation effectively. We will ask for your consent to store your special category data.**
- Some of the personal detail you provide may be 'special category data', for example related to illness or disability. This may be useful for example in volunteering and employment situations where we can identify if there are any reasonable adjustments that can be made.
- enable your access to and use of the website to make electronic bookings for services
- publish your feedback on the website in a way that ensures your full name and personal data are not disclosed
- contact you for the purpose of discussing a booking, that you have previously made

Your information will be held confidentially. Occasionally we may need to disclose information to our Data Processor. Where we need to do so, the Data Processor in question will be obligated to use that personal information in accordance with the terms of this privacy statement.

In addition to the disclosures reasonably necessary for the purposes identified above, Eastcott Community Organisation may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, national security and in order to establish, exercise or defend its legal rights.



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Securing Your Data

Eastcott Community Organisation will take reasonable technical and organisational precautions to :

- prevent the loss, misuse or alteration of your personal information
- store, process and transport all personal information you provide in a secure manner.

How long do we keep your personal data?

We will only keep data for as long as we need it. This means that we will delete it when it is no longer needed. We will keep some records permanently if we are legally required to do so and may keep some other records for an extended period of time to follow best practice. For example, it is currently best practice to keep employment records for 5 years.

Updating This Statement

Eastcott Community Organisation may update this privacy policy by posting a new version on our website at any time. You should check occasionally to ensure you are familiar with any changes.

<https://www.book-online.co.uk/eastcott/pages/policies>

Your rights and your personal data

You have the right to access, correct, have erased, and object to processing your personal data. You can make any changes easily by email, or by post (see Contact Details below).

When exercising any of the rights, we may need to verify your identity for your security. Once we have received your request we will respond within one month. For the right to access there are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

We will confirm whether the data has been deleted or processing has stopped or the reason why this cannot be done (for example because we need it for our legitimate interests or regulatory purpose(s)).

You have the right to lodge a complaint with the Information Commissioner's Office.

Please note that if you prevent us from processing your personal information, we may not be able to provide a service to you, or receive a service from you.

Communication

Please note that communication platforms that we use (email, Facebook, Twitter) have separate Privacy Notices and the responsibility for data safety will be summarised therein.



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Contacting Us

If you have any questions about this Privacy Notice or your personal information, please contact us:

by email to: eastcottcommunity@yahoo.co.uk

by post to: Eastcott Community Organisation,
c/o Eastcott Community Centre
Savernake Street, (Off Eastcott Hill), Swindon, SN1 3LZ

You may also wish to refer to our Data protection Policy and Data Protection Grid which is on our website at : <https://www.book-online.co.uk/eastcott/pages/policies>

* The material in this document does not give a full statement of the law, nor does it reflect changes after April 2018. It is intended for guidance only and is not a substitute for professional advice. No responsibility for loss occasioned as a result of any person acting or refraining from acting on the basis of this material can be accepted by the author or by Advising Communities.

Please read this privacy notice alongside our Data Protection policy and Data Protection Grid.



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Appendix B

Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Accident & Incident forms	To comply with Health & Safety legislation	7 years	Paper on site, locked cabinet in locked room	DP policy
Bookings checklist – list of bookings (basic details*)	Name & hire request, in case of query	2 months – monthly report to committee*	Spreadsheet on password protected laptop	DP policy
Complaints	Resolve issue and demonstrate how we dealt with it	As per complaints policy	Paper on site, locked cabinet in locked room	DP policy
Contracts for one-off work	Confirms agreement to rates and tasks to be done.	? 1 year after work completed In case of any queries relating to the work	Paper on site, locked cabinet in locked room	In contract itself and DP policy
Contracts for services	Retain in case needed for reference and for financial detail	7 years	Paper on site, locked cabinet in locked room	DP policy
DBS number for volunteers/key holders	Confirms that we are compliant with requirements for role, demonstrates due diligence in volunteer recruitment	As long as person is in role Why: Need to demonstrate compliance	Paper on site, locked cabinet in locked room	Data Protection Policy & on relevant forms.
ECO employee details forms – kept by accounts / treasurer	Contact with employees	Duration of employment and 7 years after, Communication	Paper on site, locked cabinet in locked room	DP policy
ECO Payroll / Pay details	In case HMRC require it	3 years from the end of the tax year they relate to	Paper on site, locked cabinet in locked room	DP policy



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Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Email list – list of current / regular hirers	Communication – e.g. snow & ice – tick list – all in one place – simple emails and group – no other information	Duration of hire & 1 year, Communication	Spreadsheet on password protected laptop	DP policy
Emails containing personal data	May be an ongoing query or need to contact the person as part of our business.	Delete as soon as no longer needed, check emails regularly. Why: Data should be captured elsewhere if needed for business purposes	Email including personal computers of Trustees.	Data protection policy
Grant applications (unsuccessful)	Retain in case of queries and re-use	Until funding received or project no longer viable	Paper on site, locked cabinet in locked room	DP policy
Grant applications (successful)	Retain in case of queries	Duration of grant plus 7 years as per invoices below	Paper on site, locked cabinet in locked room	DP policy
Hirer agreement forms (one off hire party) in CURRENT / FUTURE	To ensure party hirer and public are covered	keep for 7 years as per invoices below	Paper on site, locked cabinet in locked room, until shredded	Website DP policy
Hirer agreement forms (one off hire party) IN THE PAST	To ensure party hirer and public are covered	keep for 7 years as per invoices below	Paper on site, locked cabinet in locked room, until shredded	Website DP policy



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Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Hirer agreement forms (regular groups) including insurance for qualifications (3rd party data) IN THE PAST	Proof that hirer has qualifications to run course. Proof that hirer has insurance to cover themselves and public PLI	keep for 7 years as per invoices below	Paper on site, locked cabinet in locked room	Website DP policy
Hirer agreement forms (regular groups) including insurance for qualifications (3rd party data) CURRENT	Proof that hirer has qualifications to run course. Proof that hirer has insurance to cover themselves and public PLI	As long as hirer hires room with ECO – keep for 7 years as per invoices below	Paper on site, locked cabinet in locked room	Website DP policy
Historic email	It is an ongoing activity to check historic emails and delete those where there is no legitimate interest to retain.	As soon as is practical	Personal Email of Trustees	DP policy
Historic minutes	Due to time constraints it is not reasonable to check this	7 years unless business critical	Paper on site, locked cabinet in locked room. Secretary locked laptop.	DP policy
Invoice log - contact - email - frequency of booking etc	Contact name – group – email – hire rate – details of hire	12 months, kept in case of queries	Spreadsheet on password protected laptop	DP policy
Invoices (paper) – kept by accounts/treasurer	Check on Payment /receipt of	7 years for finance records. Will be passed to external auditor / examiner for annual accounts.	Paper on site, locked cabinet in locked room	DP policy



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Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Job applications and matrixes for unsuccessful candidates	Retain in case of queries	6 months after interview (suggested by ACAS)	Paper on site, locked cabinet in locked room	DP policy
Job applications and matrixes, performance reviews for staff	Retain in case of queries during and after employment including reference requests	Duration of employment plus 7 years afterwards, unless requested by employee to destroy earlier (in which case we would be unable to provide a reference).	Paper on site, locked cabinet in locked room	DP policy
Membership data	AGM. Role in ECO – voting rights. Requirement to inform them of AGM & changes to governing document	Duration of membership & 1 years. Membership can be terminated only by member (opt out) or at committee discretion	Spreadsheet on Password protected laptop Jo to start this in January & Paper on site, locked cabinet in locked room	DP policy Tick box on membership form
Minutes –Including TEN and Fire drill lists. Where names need to be used then covered by legitimate interest. Obtain permission where possible.	Charity rules Health & safety	7 years unless business critical	Paper on site, locked cabinet in locked room once signed off. Email to committee on locked laptops Secretary locked & password protected laptop.	DP policy



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Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Other contact information - Non member, non hirer, non volunteer, non staff – e.g SBC, councillors, suppliers, funder data	Useful information, contact info regarding essential maintenance of the centre or enabling delivery of events	Indefinitely	Email contact list on password protected laptop Online	DP policy
Phone numbers and names of key holders	Contact	Delete when no longer required	Personal phones of Trustees	DP Policy
Photo permissions, permission to use photos and material in books, newsletters, on social media etc	retain in case needed for reference	7 years	Paper on site, locked cabinet in locked room	DP policy
References for volunteers	Confirms we comply with volunteer policy, demonstrates due diligence in volunteer recruitment	Why: Need to demonstrate compliance with volunteering policy. Keep for one year duration of volunteering at centre and 7 years after	Paper on site, locked cabinet in locked room	Volunteer Policy/ DP Policy – plus with the request for references (this has data of the referee as well as volunteer)



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Policy Documentation

Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
References provided by us for volunteers / staff	In case original goes missing. For subsequent reference requests.	6 months.	Paper on site, locked cabinet in locked room	DP policy
Repair Café forms	In case of issue with repair - signed disclaimer, Document what we are keeping out of landfill - for funding purposes, If Repair Cafe International themselves were to ask	12 months	Paper on site, locked cabinet in locked room	DP policy



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Policy Documentation

Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Social Media / Facebook / Twitter – minimise interaction personal data	We are unable to delete messages. Social media platforms have a responsibility to comply with GDPR. Users are encouraged to use email rather than Facebook and Twitter messaging as it is easier to keep track of conversations.	We are unable to delete messages.	Online	DP policy Facebook “about”
Survey Monkey – online – email addresses used	This platform has a responsibility to comply with GDPR	If we can delete personal data after 6 months then delete	Online	We have consulted GDPR and they are ensuring their site will be GDPR compliant by May 2018
Trustee automatic disqualification form	Requirement by Charity Commission	Currently indefinite – governance of organisation	Paper on site, locked cabinet in locked room	DP policy
Trustee Declaration form	Requirement by Charity Commission	Currently indefinite – governance of organisation	Paper on site, locked cabinet in locked room	DP policy



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Policy Documentation

Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Volunteer forms for current volunteers Key holder form Lone working policy DBS number	Contact details and agreement by volunteers	As long as people volunteer for us and for 1 year afterwards. Need contact details and agreement, volunteer may return, there may be queries over the role, unlikely to return/be queries after 1 year	Paper on site, locked cabinet in locked room	DP policy referred to in Volunteer Policy, Key Holder Form and Lone Working Policy
Volunteer forms for those who have never started volunteering	Initially, contact details and agreement by potential volunteers	6 months from date of completion of form, unless person intends to start volunteering. Unlikely to start after 6 months Retain for 6 months unless volunteer intends to volunteer within 6 months. If the person has not volunteered in that further 6 months, destroy application and references (maximum 1 year retention)	Paper on site, locked cabinet in locked room	DP policy Refer to DP policy on form



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Policy Documentation

Data	Why do we keep it (business case)	How long for, and why	How is it kept	How to communicate
Volunteer forms, notes of meetings, roles & involvement	retain in case of queries during and after employment including reference requests	Duration of volunteering plus 3 7 years (?) afterwards, unless requested by volunteer to destroy earlier (in which case we would be unable to provide a reference.)	Paper on site, locked cabinet in locked room	DP policy
WEBSITE – future - one off HIRE Inc invoices	Current information	1 year	online	Website DP policy
WEBSITE – in the future - Regular HIRE	To maintain bookings	Whilst booking is within hall & 1 year after	Online	Website DP policy
WEBSITE – past - one off HIRE	We don't keep data.	As soon as practical	Online	Website DP policy
WEBSITE – past - Regular HIRE	We don't keep data unless there is a business case to do so.	As soon as practical unless specifically requested not to remove.	Online	Website DP policy