

Horseman's Green Community Group - Data Protection Procedure

Managing Data Protection

As a not-for-profit organisation HGCG does not need to register with the Information Commissioner's Office.

Purpose of data held by Horseman's Green Community Group

The Trustees have the main responsibility for determining the manner and purpose for which personal data is collection and used and for managing data protection issues and compliance for Horseman's Green Community Group (HGCG).

The Group Secretary is responsible for ensuring HGCG Data Protection Procedure is kept up to date. It is the responsibility of all volunteers to inform the Secretary of any changes in the type personal data being collected or in the processing of data.

GDPR applies to personal information held on both computers and in paper filing systems.

Access to personal data must be restricted to authorised individuals for approved purposes. All volunteers who have access to personal data controlled by HGCG whether on computer or on paper must take adequate precautions to ensure confidentiality and comply fully with HGCG procedures and requirements.

Laptops are particularly vulnerable to theft; personal data should not be stored on laptops unless this is unavoidable and appropriate security measures have been put in place which will comprise encryption and security system. These measures will apply to portable data storage media such as data sticks. Personal data must not be transmitted over the Internet, nor send to a third party on portable storage or in paper form unless A secure delivery service is used
Where emails are sent to a number of people, blind copying should be used, instead of the 'To' box.

Volunteers must not leave personal data on screen or on desk tops when they are not at their desks. Paper records should be stored securely unless under active consideration. A clear desk policy should be observed.

Computers where personal data is stored must have suitable security, passwords must be changed regularly and not handed to others. Paper files must be kept in a closed cupboard, preferably locked.

Sensitive data

HGCG does not request or hold any sensitive data

Requests for Information

Individuals have a right of access to the data HGCG holds about them. Upon receipt of a written request HGCG shall disclose all data held on the individual, such a request should be passed to HGCG Secretary. Individuals have the right to be told whether their personal data is being processed and, if so, to be given a description of the personal data held, the purposes for which it is being processed and given any information available regarding the source of the personal data.

The request for information will be dealt with promptly and in any event within 14 days from HCGC receiving the written request, if sufficient details are provided to allow HGCG to respond to it and sufficient details to confirm the identity of the person making the request. If further information is required before the request can be processed this will be requested in a timely manner and once received the time schedule above will be followed.

Disclosure to Third Parties

HGCG does not pass on personal data to any Third Party, not receive data from Third Parties.

Responsibilities

Volunteers will seek advice from the Trustees, where there are any doubts as to whether or not the processing of personal data they require to carry out their volunteer duties complies with GDPR.

Volunteers will not use personal information that they hold in the course of their volunteer placement for any reason other than the performance of their duties. To procure personal information from HGCG and use it without its consent is likely to constitute a criminal offence under the Act.

Volunteers will assist the Secretary in the conduct of any audit or preparing a response to an access request.

Volunteers, authorised to process personal data for the HGCG, must ensure it is kept safe and secure, in accordance with any procedures issued by HGCG. Where no procedures are set out explicitly, they should exercise a degree of care over the personal data that is processed, by considering the harm that may result were the information to be disclosed unintentionally.

Volunteers must notify the Secretary immediately should they detect any potential or actual breach of the Act.

Security

Named volunteers of HGCG will be authorised to gain access to certain personal data in order to fulfil their duties.

Personal data must not disclose to other volunteers unless unauthorised to do so by the Secretary or Trustees.

HGCG's Data Protection Procedure:

Trustees are made aware of their responsibilities on taking up their post

Details of Data Protection procedure are included in the Volunteer Terms of Reference.

Data Protection will be a fixed item (under Policies & Procedure Review) on Trustee and Management Committee meeting agendas.

Data Protection Policy and Procedure documents are included in the annual review document.

At the point at which personal data is requested or photographs will be taken, details of how this will be used/not used are set out

- AGM and other meetings
- Events
- Questionnaires

When a new project is considered the question is asked 'why are we asking for such data, what will it be used for, do we really need it?'

Reasons for collecting personal data:

- To process hall bookings
- To take payments, process and sent receipts
- Keep people in touch and up to date with Community Group activities
- Trustee information for Charity Commission
- Volunteer Administration
- Gift Aid
- Donations, process and acknowledge
- To promote the use of the Community Hall

Personal Data is held by

- Secretary – volunteers,
- Bookings Administrator – details of those hiring the Hall
- Treasurer – payments, receipts, Gift Aid
Information included in financial reports are anonymised
- Facebook and Website admin - photographs

Data may be held by HGCG for the following purposes:

Purpose	Data collected	From whom
Organising volunteers	Names, addresses, emails,	Volunteers
Fundraising	Names, addresses, emails	Those donating
Hall bookings	Names, addresses, emails	Those hiring hall
Accounts	Names, addresses, emails, bank details	Gift Aid Donations
Advertising	Names, emails	Community
Research	Names, emails, some addresses, number in household	Questionnaire responses
Social Media	Event photographs	Attendees

Data held is reviewed every two years. Individuals we hold data for will be asked to update such data. Any data found to be incorrect or where an individual requests such action, will be deleted.

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