



Data Protection Policy

Aims of this Policy

The Penkside Community Champions need to keep certain information on its trustees, employees, volunteers and service users to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers all trustees, employees and volunteers.

Definitions

In line with the Data Protection Act 1998 principles, Penkside Community Champions will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be

used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.

- Access: Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.

- Stewardship: Those collecting personal data have a duty of care to protect this data throughout the data life span.

Type of information processed

Penkside Community Champions may process the following personal information:

- personal details
- family detail
- membership details
- goods and services
- financial details
- physical or mental health details

Personal information is kept in the following forms: hard copies on paper, digital copies on local machines, shared network drives and cloud services.

Groups of people within the organisation who will process personal information are employees and volunteers.

Notification

The name of the Data Controller within our organisation is Stewart Bishop

Responsibilities

Policy Implementation under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of the Penkside Community Champions, this is the board of trustees.

The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:

- understanding and communicating obligations under the Act
- identifying potential problem areas or risks
- producing clear and effective procedures
- notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes

All employees and volunteers who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

To meet our responsibilities trustees, employees and volunteers will

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;

- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.

Queries about handling personal information will be dealt with swiftly and politely.

Training

Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:

On induction: explanation of data protection policy and a personal copy of the policy being presented to the employee or trustee

General training/ awareness raising: regular reviews, (at least every 2 years, or when the policy is reviewed).

Gathering and checking information

Before personal information is collected, we will consider: the type of information it is necessary to collect in order to adequately and thoroughly perform our duties.

We will inform people whose information is gathered about the following: the way in which the information will be held, how we will use the information, the retention policy for such information and whether and with whom we will share the information.

We will take the following measures to ensure that personal information kept is accurate: all hard copy documents will be kept in locked drawers or filing cabinets available only to authorised people. All digital data will be kept in password protected files, where the password is only available to authorised people.

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

Data Security

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken: all hard copy documents will be kept in locked drawers or filing cabinets available only to authorised people. All digital data will be kept in password protected files, where the password is only available to authorised people.

Any unauthorised disclosure of personal data to a third party by a volunteer or trustee may result in termination of volunteering position

Subject Access Requests

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to Secretary, Musical Theatre Stafford at the address below.

The following information will be required before access is granted: The type of information that is being requested, such as name and contact details and the reason for such request. We may also require proof of identity before access is granted. The following forms of ID will be required: at least 2 pieces of ID detailing name and address details. If the ID is not photographic the document should be dated within the last 3 months.

Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within 30 days from receiving the written request.

Review

This policy will be reviewed at intervals of 2 years to ensure it remains up to date and compliant with the law, although a review may be held every 12 months if the Governance Sub-Committee deem it necessary.

Declaration

I confirm I have read and understood The Penkside Community Champions Data Protection Policy and will act in accordance with it.

I am connected with this organisation in my capacity as a

- Member
- Volunteer
- Trustee/ management committee member (Delete as appropriate)

Signature:-----

Print name:-----

Date:-----

Please return this form to the Data Controller, Stewart Bishop, in person or by email on stewart.bishop@corganisers.org.uk