**Bude-Stratton Community Project**

**Neetside Community Centre**

**Data Protection Policy**

Policy adopted: **September 2018**

Date to be reviewed: **September 2019**

**Introduction**Bude-Stratton Community Project (BSCP) Trustees are committed to processing data in accordance with our responsibilities under General Data Protection Regulation (GDPR) for our members of staff, volunteers, Hirers and the members of the public that use our premises.

### 1. Data protection principles

Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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 not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;
5. 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 subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
6. 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.

### 2. General provisions

1. This policy applies to all personal data processed by the BSCP.
2. On a day to day basis, the Centre Manager is the Responsible Person and alongside the BSCP Trustees takes responsibility for the ongoing compliance with this policy.
3. This policy shall be reviewed at least annually.
4. BSCP has not registered with the Information Commissioner’s Office (ICO) as an organisation that processes personal data on the basis that the personal data processed is exempt. As defined by the ICO. [[1]](#footnote-1)
5. All Trustees and employees will be provided with a copy of this policy and appropriate training.

### 3. Lawful, fair and transparent processing

1. To ensure its processing of data is lawful, fair and transparent, the BSCP shall maintain a Register of Systems.
2. The Register of Systems shall be reviewed at least annually.
3. Individuals have the right to access their personal data and any such requests made to BSCP shall be dealt with in a timely manner.

### 4. Lawful purposes

1. All data processed by BSCP will be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
2. The appropriate lawful basis is noted on the Register of Systems.
3. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
4. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available and systems will be in place to ensure such revocation is reflected accurately in our systems.

### 5. Data minimisation

1. BSCP shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
2. BSCP does not request, hold or access Hirers’ clients’ personal data.

### 6. Accuracy

1. BSCP will take reasonable steps to ensure personal data is accurate.
2. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### 7. Archiving / Removal

1. To ensure that personal data is kept for no longer than necessary, the Register of Systems considers and notes what data should and must be retained, for how long, and why.
2. A copy of the employees’ files are kept off site in locked storage by the Chair of Trustees. Employees are informed on appointment and as part of their employment Terms and Conditions.
3. Paper data will be shredded.
4. When personal data is deleted this will be done safely such that the data is irrecoverable.

**8. Security**

1. BSCP will ensure that personal data is stored securely using modern software that is kept-up-to-date.
2. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
3. No data is passed onto 3rd parties.
4. Appropriate back-up and disaster recovery solutions are in place.
5. All staff sign a confidentiality agreement on appointment.

### 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, BSCP will promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO.

**The Data Protection Policy** was agreed and minuted at a meeting of the Board of Trustees on:

Name:

Signed: Date:

FINAL19/10/2018MCv2

1. https://www.gov.uk/notification-to-process-personal-data [↑](#footnote-ref-1)