



INFORMATION & DATA PROTECTION POLICY

1. Introduction

In order to conduct its business, services and duties Sedgefield Community Association CIO (SCA) processes a wide range of data, relating to its own operations and some which it handles on behalf of partners. In broad terms, this data may be classified as:-

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies that are being worked upon
- Confidential information about other organisations because of commercial sensitivity
- Personal data concerning its current, past and potential employees, Trustees and volunteers
- Personal data concerning individuals who contact SCA for information, to access its services, sections or facilities to make a complaint

SCA will adopt procedures and manage responsibly, as will its Sections, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations it works with and members of the public. In some cases, it will have contractual obligations towards confidential data, but in addition will have specific legal responsibilities for personal and sensitive information under data protection legislation.

This policy covers all Sections under the umbrella of SCA

The Policy is linked to our Document Retention Policy and ICT Policy which will ensure information considerations are central to the ethos of the organisation.

SCA will periodically review and revise this policy in light of experience, comments from data subjects and guidance from the Information Commissioners Office. It will also be reviewed in March each year in accordance with Charities governance structure. The first review will be March 2019.

The Board will be as transparent as possible about its operations and will work closely with the public, community, voluntary organisations and our membership. Therefore, in the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members. Details of information which is routinely available is contained SCA Privacy Notice.

2. Protecting Confidential or Sensitive Information

SCA recognises it must at times, keep and process sensitive and personal information about its employees, members and the public. It has therefore adopted this policy not only to meet its legal obligations but to also ensure high standards.

The General Data Protection Regulations (GDPR) which became law 25th May 2018 and will, like the Data Protection Act 1998 before them, seek to strike a balance between the rights of individuals and the sometimes, competing interests of those such as SCA with legitimate reasons for using personal information.

This Policy is predicated on the premise that personal data must be: -

- Processed fairly, lawfully and in a transparent manner in relation to the data subject
- Collectable for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with these purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate, and when necessary, kept up to date

- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which personal data are processed
- 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.

SCA processes personal data in order to: -

- Fulfil its duties as an employer by complying with the terms of contract of employment, safeguarding the employee and maintain information required by law
- Pursue the legitimate interests of its business and its duties as a charity, public organisation, member organisation, by fulfilling contractual terms with other organisations, and maintaining information required by law
- Monitor its activities
- To fulfil its duties in operating Ceddesfeld Hall including security
- Assist regulatory and law enforcement agencies
- Process information including the recording and updating details about Trustees, Members, volunteers, partners.
- Process information including the recording and updating details about individuals who contact it for information or access to a service, section, Ceddesfeld hall or make a complaint
- Undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Charity and its sections
- Undertake research, audit, and quality improvement work to fulfil its objects and purposes
- Carry out Board and Section administration.

Where appropriate and governed by necessary safeguards we will carry out the above processing jointly with other partners and public bodies and all sections from time to time.

The Board and its Section Committees will ensure that the following conditions, contained in the Privacy Notice, are met for personal information to be considered fairly processed.

The Board and its sections pay particular attention to the processing of any sensitive personal information and the Board will ensure that at least one of the following conditions is met:-

- Explicit consent of the individual
- Required by law to process the data for employment purposes
- A requirement in order to protect the vital interests of the individual or another person

The Board as a corporate body and Charity has ultimate responsibility for ensuring compliance with the GDPR/Data Protection Legislation. The Board has delegated this responsibility day to day to the Company Secretary.

- a. E-mail john@jandmrobinson.com
- b. Phone 01740 620042
- c. Correspondence John Robinson, 28 White House Drive, Sedgefield, County Durham, TS21 3BX

3. Complaints

If an individual has a complaint regarding the way personal or any other data has been processed, they may make a complaint to the Company Secretary, Charity Commission or Information Commissioners office, casework@ico.org.uk Tel: 0303 123 1113

The Board will always give guidance on data, personal data to members or Sections.

The Board will ensure that individuals or organisations on whom data is kept are aware of their rights and have easy access to that information.

4. Making Information Available

The Publication Scheme is a means by which the board may make a significant amount of information available routinely, without waiting for someone to specifically request it. The scheme is intended to encourage local people to take an interest in the work of SCA and its role within the Community.

In accordance with the provisions of the Freedom of Information Act 2000, this scheme specifies the classes of information which SCA publishes or intends to publish. It is supplemented with an Information Guide which will give greater detail of what Sedgefield Community Association via its Board will make available and hopefully make it easier for people to access it.

All formal meetings of the Board and Association are subject to Constitution and statutory notice of its agendas will be made public. Minutes of these meetings will also be published.

5. Disclosure Information

The Board will as necessary undertake checks on its volunteers, members and Trustees with the Disclosure and Barring Service when appropriate. Relevant Sections are aware of their requirement to undertake this. The Board will also comply with the relevant Code of Conducts of the Charity Commission relating to security storage, handling, use, retention and disposal of Disclosures and Disclosure Information. It will include an appropriate operating procedure in its integral management system.

6. Data Transparency

SCA has resolved to act in accordance with the Code of Recommended Practice for Local Authorities on Data Transparency. This sets out the key principles for local organisations in creating transparency through the publication of public data and is intended to help them meet obligations of any legislative framework concerning information.

‘Public Data’ means an objective, factual data on which policy directions are based and on which Charities and Voluntary organisations as well as public bodies are assessed.

This Policy will therefore underpin the Board and SCA decisions on the release of public data and ensure it is proactive in pursuing higher standards and responding to best practice.

The principles of the Policy are underpinned by: -

- Demand led: new technologies and publication of data should support transparency and accountability
- Open: the provision of public data will be integral to the Board and Section engagement, through members and volunteers
- Timely: data by all Sections and Board will be published as soon as possible after production.

Appendix A to this Policy explains Data Protection Terminology

Signed on behalf of SCA.....Wendy R Gill.....

Date Adopted.....15th November 2018.....

Next review date.....17th March 2020.....

Sedgefield Arts, Recreation and Community Association CIO, Ceddesfeld Hall, Rectory Row, Sedgefield, TS21 2UE
Charity Number 1161621

Appendix A

Data Protection Terminology

Data subject: means the person whose personal data is being processed. That may be an employee, member, volunteer, Trustee or someone transacting with SCA in some way.

Personal Data: means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person. It can be anything from a name, photo, address, date of birth, an email address, bank details and posts on social networking sites or a IP address

Sensitive Personal data: includes information about racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data or information related to offences or alleged offences where it is used to uniquely identify an individual

Data controller: means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data is to be processed

Data Processor: in relation to personal data, means any person, other than an employee of the data controller who processes the data on behalf of the data controller

Processing information or data: means obtaining, recording or holding the information or data or carrying any operation or set of operations on the information or data, including:

- a. Organising, adapting or altering
- b. Retrieving, consulting or using the information or data
- c. Disclosing the information or data by transmission, dissemination or otherwise making it available
- d. Aligning, combining blocking, erasing or destroying the information or data, regardless of the technology uses.