

RG spaces' Data Protection Policy

Agreed by the Board of Trustees: October 2015 minor amendments made March 2017

Due for review on or before: October 2018

Background

RG spaces is a very small charitable organisation. We do not employ staff but we have trustees, volunteers and occasional paid consultants about whom we need to keep some data. In time we may need to keep data on others, for example those who contact us for information or who take part in events. If so, we will review this policy.

Aims of this Policy

We are committed to ensuring any personal data will be dealt with in line with the Data Protection Act. 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 aware of the requirements and acts in accordance with data protection procedures. This document also highlights our key data protection procedures. Everyone in the organisation is expected to comply with this policy and to follow the relevant procedures, including volunteers, subcontracted consultants and Trustees.

Definitions

In line with the Data Protection Act principles, we will ensure that personal data will

- be obtained fairly and lawfully
- be obtained and processed 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 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. RG spaces 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 has 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

RG spaces processes: names, contact details, dates of birth, next of kin and information commonly found in a curriculum vitae or otherwise in an application for volunteering or consultancy work.

Personal information is kept in the following forms: paper files; on a computer.

Groups of people who will process personal information are: trustees, volunteers, consultants.

Responsibilities

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 RG spaces this is the Board of Trustees.

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

Policy Implementation

To meet our responsibilities we will:

- ensure any personal data is collected in a fair and lawful way
- explain why it is needed at the start
- ensure that only information that is 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 procedure.
- queries about handling personal information will be dealt with swiftly and politely.

Training

On induction: all will be informed of RG spaces' policies and told how to find them; anyone specifically collecting or processing personal data will be asked to confirm their agreement to this policy by signing a copy.

General training/awareness-raising: all policies are published on the website; the Board of Trustees will consider the policy and take advice on updating it regularly.

Gathering and checking information

Before personal information is collected, we will consider: exactly why we need the information and any steps we could reasonably take to minimise what we collect.

We will inform people whose information is gathered about the following: the reasons we are collecting the data; how it will be processed and to what purpose

We will take the following measures to ensure that personal information kept is accurate: information will not be stored for longer than is necessary to undertake the tasks for which it was collected; if we need to keep personal information for more than a year we will endeavour to contact individuals so they can update the information.

Data Security

The organisation will take steps to ensure that personal data is kept secure against unauthorised or unlawful loss or disclosure. The following measures will be taken: paper records kept in a lockable filing cabinet; electronic records kept on a password protected computer or online with password protection. We do not keep sensitive personal data (under the meaning of the Act q.v.). If this changes we will review this policy.

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 The Chair of Trustees, RG spaces at its registered address.

We may require proof of identity before access is granted. If a large number of requests is received we may require payment of a fee of £10 for each request.

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 the 40 days required by the Act from receiving the written request.

Office of the Information Commissioner (ICO)

As at the time of publishing this policy, we have ascertained that RG spaces does not need to register with the ICO. If our use of personal data changes, the need for registration will be reviewed.

To be signed by anyone who will be collecting or processing personal information.

Declaration I confirm I have read and understood RG spaces' Data Protection Policy and will act in accordance with it.

I am connected with RG spaces in my capacity as a

- Consultant
- Volunteer
- Trustee
- Other:

Signature:

Print name:

Date:

Please return this form to The Chair of Trustees, RG spaces, at our contact address which can be found on the Charity Commission website.