



Winslow Big Society Group Data Protection Policy

Purpose of this policy

Personal information stored or processed on a computer is subject to the Data Protection Act 1998 (DPA) and, from 25 May 2018, the General Data Protection Regulation (GDPR), which came about because of the growth of the "Information Society" in particular, in response to concerns about the threat to personal privacy that the manipulation and transfer of data by computers can pose.

Winslow Big Society Group (WBSG) is committed to ensuring that it holds and processes personal data in full compliance with the DPA and GDPR and acknowledges that breaking the DPA/GDPR contravenes the law and may result in WBSG being prosecuted, fined and/or our reputation being damaged. WBSG is exempt from registration with the Information Commissioner on the basis that we:

- are established for not-for-profit making purposes and do not make a profit to enrich others;
- only process information necessary to establish or maintain membership or support (including providing services to beneficiaries);
- only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
- only share the information with people and organisations necessary to carry out the WBSG's activities and only with permission to share information from the data subject; and
- only keep the information while the individual is a beneficiary, member or supporter or as long as necessary for beneficiary /member/supporter administration.

Should any of the above cease to be the case we will register with the Information Commissioner in line with his/her requirements.

Requirements of the DPA/GDPR

There will be a nominated person on the WBSG committee in charge of data protection issues.

The people about whom we hold information are referred to in this policy as data subjects.



Under the DPA/GDPR, any personal data, including that held on electronic or manual filing systems, must be:

- processed fairly, lawfully and in a transparent manner.
- collected for specific, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and kept up to date;
- be processed and stored securely; and
- not be kept longer than is necessary.

Processing personal data is only lawful if:

- the data subject has given consent for one or more specific purposes;
- it is necessary to meet contractual obligations entered into by the data subject;
- it is necessary to comply with legal obligations of WBSG (as data controller);
- it is necessary to protect the vital interests of the data subject;
- it is necessary for tasks in the public interest or the exercise of authority vested in WBSG (as data controller); or
- it is for the purposes of legitimate interest pursued by WBSG (as data controller);

Written consent from a data subject is obtained by signing the GDPR section on the volunteer application form.

Data subjects have rights regarding the processing of personal data including rights to:

- access their data and information about its uses;
- have their data corrected or completed;
- have their data erased if:
 - the data is no longer necessary in relation to the purposes for which they were collected;
 - they withdraw their consent and there is no other lawful basis for processing the data;
 - they object to the processing and there are no overriding legitimate grounds for the processing;
 - it has been unlawfully processed; and
 - it has to be erased for compliance with a legal obligation
- restrict the processing of their data in specific circumstances;
- object to the processing of their data in specific circumstances;



-
- withdraw consent (where given); and
 - complain to the Information Commissioner.

Our policies

1. WBSG will not hold or process information about individuals without their knowledge and, where required, their consent.
2. WBSG will only hold information for specific purposes and will inform data subjects what those purposes are, how long we will store the data and their rights and we will also inform them if those change. This permission is given by the volunteer on signing the GDPR section on the volunteer application form.
3. WBSG will never provide information to third parties unless required to do so by the law or with the consent of the data subject.
4. Information will not be retained once it is not required for its stated purpose.
5. WBSG will seek to maintain accurate information whilst it is retained by creating ways in which data subjects can update the information held.
6. Data subjects will only receive communications from WBSG if they have consented to do so.
7. Data subjects are entitled to have access to information held about them by WBSG, subject to reasonable notice. Requests should be made in writing to the nominated member of the WBSG committee.
8. Data subjects are entitled to have data we hold about them corrected and/or completed.
9. Data subjects have the right to erasure of personal data we hold about them in circumstances set out in the GDPR.

WBSG has adopted procedures for ensuring the security of all personal data.

- Any WBSG Trustee, worker or volunteer who has access to personal data will have received appropriate training over how it may be used.
- Paper records containing confidential personnel data are stored and disposed of in a secure way (i.e. in locked, non-portable secure storage containers).
- Electronic records are kept in a secure, encrypted, password protected environment that complies with GDPR requirements.



Signed:

Chair: VC Corben

July 2022

Charity number : 1179561

Contact: contact@winslowbigsocietygroup.info