

**Policy for Safeguarding Personal Data**

**Edition 1.4 March 2018**

**References:**

**A.** GDPR can be found at: <https://gdpr-info.eu/>

**B.** The Guide to the GDPR issued by the Information Commissioner’s Office is at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

**C.** Constitution of The Bourne Conservation Group 2013

**D.** Safeguarding Policy for Working with Children and Young Persons, Nov 2014

**Introduction**

1. The Bourne Conservation Group (BCG) carries out practical work in The Bourne area of South Farnham with the aim of maintaining and enhancing its landscape and biodiversity with due regard to its historical associations**.**

2. In order to meet safety requirements and ensure efficient administration, the Group

holds a limited amount of Personal Data on its Members. The need to protect this data in accordance with the Law has always been fully recognised. The principles for doing this were set out in the Data Protection Act of 1998 but this is to be superseded by the General Data Protection Regulation (GDPR) which comes into force on 20th May 2018 **(References A and B).**

**Aim**

3. The aim of this document is to establish a robust Policy compliant with GDPR to enable BCG to safeguard the Personal Data of its Members and Friends by 20th May 2018.

**Lawful Requirement to Hold Personal Data**

4. BCG is an independent, voluntary community group set up in 2002 to carry out conservation work. It operates in accordance with its Constitution (**Reference C**) approved by all members and is managed by a committee elected annually. As a Not-for-Profit Organisation with an annual income below £5000 its legal status is that of an Unregistered Charity.

5. In order to conduct its affairs in an orderly, efficient and safe way, BCG has a legitimate requirement to hold Personal Data on its two classes of volunteers: Members who execute the practical work and Friends who support the aim and aspirations of the Group and pay an annual subscription.

6. Within the terms of GDPR there is thus a Lawful basis for data to meet the Legitimate Interests of the group **(reference B**, Section on Lawful Basis for Processing).

7. All Members and Friends of BCG are volunteers and will in future be asked to give written consent to the processing of their personal data and this provides an additional lawful basis by Consent for BCG to process such data.

**Responsibilities**

8. The Bourne Conservation Group through its elected committee is the Controller to determine how and why data is processed in accordance with this Policy. The Membership Secretary is the Processor of the Personal Data.

**Personal Data required by BCG**

9. The Personal Data of Members and Friends is required by the Group to enable it to:

 Send out notifications of work sessions, meetings and other events

Be able to pass on information quickly about incidents or changes to the programme of work, for example in the event of bad weather

 Circulate information on conservation matters and local affairs

 Send out newsletters, committee papers and other documentation

Hold adequate contact information in the event of illness or accidents and to be able to inform members of any insurance limitations

 Fulfil the terms of r**eference B** regarding the safety or behaviour of children

 Enable Friends of the group to pay their annual subscription

There is no requirement to hold Sensitive Personal Data.

**Personal Data Items to be held by BCG**

10. To meet the above requirements the following Personal Data will be collected and processed:

 **For all Members and Friends**

 Title, full name, postal address, e-mail address, landline and mobile phone numbers

 **For all Members**

Emergency contact name and telephone number.

Date of birth if under 18 years of age or over 80 years of age (for insurance purposes)

Details of qualifications relevant to the work of the Group (for example, first aid trained) and personal preferences such as attitude to use and publication of photographs.

Details of any medical condition that may affect individual members’ ability to undertake difficult or strenuous tasks

**For Friends only**

Bank account information (without pin numbers or passwords) to enable the setting up of standing order payments when needed. These details will not be retained once A friend has been registered.

**Data Protection Principles**

11. The collection and processing of data in the group is to be carried out in strict accordance with the principles set out in Article 5 of GDPR. Data must be:

Processed fairly, lawfully and transparently in relation to the Members and Friends.

Collected for the specified purposes set out above and not further processed for incompatible purposes

Relevant and limited to what is necessary for the effective work of the group

Accurate and kept up to date by adjustments to the Master Membership List

Kept in hard copy and electronic format that permit identification of members and Friends while they are active in the Group but for no longer

Processed in a secure way that ensures protection against unauthorised processing, accidental loss, destruction or damage, using the technical and organisational measures set out below.

**Acquisition and Processing of Personal Data**

12. As volunteers willing to contribute to the well-being of their community, potential Members and Friends freely make their required Personal Data available. This occurs in a number of ways including submission of a Membership Application Form, through personal contact with existing members or by phone calls or e-mails.

13. Whatever Personal Data becomes available in these various ways is to be transferred by the Processor to a Registration Form. Along with a copy of the latest BCG Privacy Notice this is returned to the applicant for further questions to be answered and to seek his or her informed and unambiguous consent to the specific uses it is intended to use the data for. When completed and returned, this form will become the basis on which the applicant is granted membership as a Member or a Friend.

14. The required consent of members for use of their data is to be acquired as shown below.

|  |  |
| --- | --- |
| **I agree/disagree to the following statements** | **Yes/No** |
| BCG may hold my personal data and process it in order to send me notifications of work sessions and other events |  |
| BCG may hold my personal data and process it in order to send me general information in the form of newsletters, reports and other documents |  |
| BCG may hold adequate contact information in order to inform me quickly of incidents or changes to the programme and for use in any emergency situation |  |
|  |  |
| **Signed** | **Date** |

15. The required consent for Friends is as follows:

|  |  |
| --- | --- |
| **I agree/disagree to the following statements** | **Yes/No** |
| BCG may hold my personal data and process it in order to send me notifications of activities and events |  |
| BCG may hold my personal data and process it in order to send me general information in the form of newsletters, reports and other documents |  |
|  |  |
| **Signed** | **Date** |

16. Children and young persons are encouraged to participate in the activities of the group. In the case of children under the age of 16, actions with respect to personal data will be in accordance with **Reference C** which requires parental consent.

17. The Processor is to file the Registration Forms after transcribing Personal Data onto the Membership Master List which is to be regularly kept up to date as changes occur. Copies are made available to nominated members of the committee. This provides resilience for BCGs operations in the event of illness or other unforeseen circumstances affecting management of the group.

**Rights of Members and Friends of BCG**

18. Throughout the procedure of collecting, processing and storing data, the Controller and Processor are to be aware of the need to uphold the rights of Members and Friends by:

(i) Informing them through the regular circulation of Privacy notices of the way in which their data is

being used

(ii) Facilitating when requested:

 Access to their Personal Data

Rectification when changes have occurred

Erasure

 Restriction of processing

 Logging objections

No automated decision making will take place in BCG.

**Privacy Notices**

19. Issue of Privacy Notices will be the main way of upholding the first principle of data protection by informing members transparently that their data is being held and processed fairly and lawfully. An example is included at **Annex A**

**Security of Personal Data**

20. The following measures and procedures are to be used to ensure security of the Personal Data held by BCG:

All hard copy data on an individual including Consent responses to be consolidated on a single document, the Registration Form

 Registration forms to be filed and stored securely by the Processor

Group data is to be consolidated on the electronic Master Membership List and distributed by the Processor to the Chairman and Secretary.

The Master Membership List is to be kept up to date as changes become apparent and reissued at the discretion of the Processor. The list is to be backed up electronically.

Personal data on those who have ceased to be members for any reason may be retained for up to one year in case issues arise, but is then to be deleted

Previous Membership Lists to be erased or shredded as soon as new ones become available

Under no circumstances is the Membership List to be made available to another individual or organisation. Individual data elements, such as a phone number, may be passed on to a third party only with the express permission of the member concerned.

Multiple e-mail addresses in a single e-mail are to be hidden from other recipients by use of the Blind Carbon Copy (BC) facility

Immediate action is to be taken to deal with security breaches including notification to individuals if there is a high risk to their rights and freedoms. The Controller is to be informed of all breaches.

 **ANNEX A**

**Privacy Notice**

In order to carry out its extensive conservation work in The Bourne area in an orderly, efficient and safe way there is a requirement to hold a small amount of your personal information. We do this in a lawful manner in accordance with the detailed procedure set out in our Policy for Safeguarding Personal Data given on our website at **bourneconservation.org.uk/policies/personaldata**

1. **Who we are**

As the Data Controller, the committee of The Bourne Conservation Group (BCG) decides how the personal data provided by you is processed and for what purposes.

1. **What personal data we collect and why**

 BCG collects:

1. Phone numbers postal addresses and email addresses to contact you about activities of the group and to keep you informed about matters of conservation interest
2. Information relating to any medical conditions you have to ensure that you are not allotted any tasks unsuitable or hazardous to you or others
3. Date of birth because of insurance limitations for those under 18 and over 80 years
4. (Friends only) Bank details for the purposes of processing annual subscriptions. These details will not be retained after registration as a Friend.

We keep your personal data only for the period during which you remain a Member or Friend

 **3. Sharing of Data**

We do not share your data with any third parties except with your prior consent or if required by law to do so

 **4. Your rights**

You have the right to request:

1. A copy of your personal data held by us and if necessary have it

amended

1. Erasure of your personal data
2. Withdrawal of your consent to processing

 For further information please refer to our Safeguarding Policy which can be

 found on our website at **bourneconservation.org.uk/policies/personaldata**

 If you have any queries or want to exercise any of your rights please contact

 Karen Redman at info@bourneconservation.org.uk