

Data Protection Policy 2018

Policy information	
Organisation	The name of the organisation responsible as the Data Controller is: Charlton Central Residents' Association (CCRA) Management Committee
Scope of policy	This policy applies to any Management Committee member processing (data processor) or accessing any personal data of CCRA members.
Policy operational date	May 2018
Policy prepared by	Jacqueline Mitchell - Membership Secretary CCRA Management Committee
Date approved by Management Committee	May 2018
Policy review date	Policy will be renewed after 6 months from operational date and yearly thereafter.

Introduction	
Purpose of policy	<ul style="list-style-type: none"> • Complying with the law • Following good practice • Protecting CCRA members • Protecting the organisation
Types of data	<ul style="list-style-type: none"> • Personal data - contact details only and preferences in relation to work of CCRA that help shape activities of organisation
Policy statement	<p>This policy is to respond to new GDPR requirements and to:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals' rights • be open and honest with individuals whose data is held • provide training and support for volunteers who handle personal data, so that they can act confidently and consistently
Key risks	<ul style="list-style-type: none"> • Personal Data stored getting into the wrong hands, through poor security or inappropriate disclosure of information • Loss of data for organisation

Responsibilities	
CCRA Management Committee	Has overall responsibility for ensuring that the organisation complies with its legal obligations.
Membership Secretary CCRA Secretary	<p>Their responsibilities include:</p> <ul style="list-style-type: none"> • Briefing the Management Committee about Data Protection responsibilities • Reviewing Data Protection and related policies • Advising members of management committee on Data Protection issues • Ensuring that Data Protection training takes place <ul style="list-style-type: none"> • Notification to the ICO of any breach • Handling subject access requests
Volunteers	All volunteers should be required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Security	
Scope	Data security is not wholly a data protection issue. It also relates to the working of the organisation and what the consequences would be of a loss of data to CCRA.
Security measures	Strict security measures should be taken to protect the personal data of CCRA members. These include secure storage for any paper membership or consent forms. Secure passwords and use of encryption procedures, control of entry to personal data.
Organisation continuity	To ensure that the organisation has continuity in the event of any data loss an online back-up through cloud drives will be used.
Specific risks	Special precautions should be taken by any volunteer processing or storing CCRA members' personal data to ensure security of any computer or laptops used. Personal Data should not be shared through USB sticks for example and security consideration be given to the use of personal data at events or during membership knock-ups etc.

Data recording and storage	
Accuracy	<ul style="list-style-type: none"> • Ensure that information on form is complete and where illegible, for example, go back to resident to clarify.
Updating	<ul style="list-style-type: none"> • There should be a regular yearly cycle of checking, updating or discarding old data.
Storage	<ul style="list-style-type: none"> • Any paper records with personal data should be kept safely • Any spreadsheet should be password protected. • Access to google documents should be password protected. • Any computer that is used to access CCRA members' personal data should be password protected. • Only most up to date spreadsheets should be kept i.e., delete any old versions.
Retention periods	<p>It may be worth setting out retention periods for different types of membership data:</p> <ul style="list-style-type: none"> • Paper Forms – Two yearly. • If CCRA decides at some point to apply for Gift Aid then paper records are required to be kept for 6 years by law. • Electronic records – Two yearly
Archiving	<p>The only archiving that will be held is the house number and street of those who do not wish to join or have contact with CCRA.</p>

Right of Access	
Responsibility	CCRA Secretary
Procedure for making request	Right of access requests must be in writing to CCRA Secretary at info@charltonresidents.org .
Provision for verifying identity	Steps will be taken to verify the identity of the person asking for rights of access.
Procedure for granting access	CCRA will invite the member to view any data that is held on them within one month of receiving request for access.

Transparency	
Commitment	The Membership Form and our Data Privacy notice explains: <ul style="list-style-type: none"> • For what purpose personal data is being processed • And how to exercise your rights in relation to the data
Procedure	Members will be informed of CCRA's procedures and lawful basis for processing data etc., in: <ul style="list-style-type: none"> • In the welcome pack for members] • Occasional reminders in the newsletter or a members' bulletin • On the web site • In our Privacy Notice

Lawful Basis	
Underlying principles for lawfully processing personal data of CCRA Members	CCRA will use your personal data for the following purposes: - <ul style="list-style-type: none"> • To enable us to provide a voluntary service for the benefit of local residents and members in a particular area as specified in our Constitution. • To enable us to provide a voluntary service for the benefit of those who live outside of the area specified in our Constitution who are Associate Members. • To administer our membership records, to send membership card and invite yearly renewal. • To promote and fundraise for CCRA. • To inform members and local residents of local news as well as events and activities being run by CCRA that they may wish to join. • To hold a list of those who have explicitly told us they do not want to be contacted by CCRA. • To claim gift aid on any donations given.
Withdrawing consent	Members are able to withdraw from membership at any time or not renew their membership in January each year.

Volunteer training & Acceptance of responsibilities	
Management Committee Members with access to personal data records	Chair, Membership Secretary, Vice Chair and Treasurer
Induction	Any Management Committee member who has access to any kind of personal data should have their responsibilities outlined during their induction procedures.
Continuing training	If any Data Protection issues are raised then advice or if needed training about the issue will be offered.

Policy review	
Responsibility	CCRA Management Committee
Procedure	Standing Yearly Agenda Item
Timing	November 2018 and yearly thereafter

For more information, please visit the ICO website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

When using a third party data processor, please read the guidelines here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/contracts/>