WFCA GROUP **WEST FAVERSHAM COMMUNITY CENTRE** BYSING WOOD ROAD, FAVERSHAM, KENT ME13 7RH		
West Faversham Comunity Assocation Registered Company No 07296070 Charity Registration No 1139228	**All The Extras Limited** Registered Company No 09062780	**Kent Community Training CIC** Registered Company No 10349844

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Issue Date:	1/4/2017	**Effective Date:**	**1/5/2018**
Issue No:	**2**	**Revision date:**	**1/5/2020**

WFCA - Data Protection

1.1 The EU General Data Protection Regulation replaces the Data Protection Act, and is designed to protect the data and privacy of individual across Europe by harmonising the practices across member states.

1.2 The Act and the Freedom of Information Act 2000 are overseen and enforced by the Information Commissioners Office (ICO), who is an independent public body responsible directly to Parliament.

1.3 The West Faversham Community Association Group ('the Association'), as a data controller, will be open and transparent when processing and using personal information by following the 8 data protection Principles:

Principle 1: Personal data shall be obtained and processed fairly and lawfully.

Principle 2: Personal data shall be obtained only for the specified and lawful purposes and shall be processed for limited purposes.

Principle 3: Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is obtained.

Principle 4: Personal data shall be accurate and kept up to date.

Principle 5: Personal data shall not be kept for longer than necessary.

Principle 6: Personal data shall be processed in accordance with the rights of the data subject under the Data Protection Act 1998.

Principle 7: Personal data (manual and electronic) must be kept secure.

Principle 8: Personal data shall not be transferred outside the European Union unless that country provides adequate levels of protection for the rights of the data subject.

2. Scope of Policy

2.1 This policy applies to all staff and volunteers within the Association. For the purposes of this policy, the term "Staff" means all members of Association staff including permanent, fixed term, and temporary staff, Trustees, agency workers, volunteers and partners working on projects with the Association.

2.2 This policy also applies to all members of staff employed by any of the Association's subsidiary companies.

2.3 This policy applies to all personal and sensitive personal data processed and stored electronically and manually. It aims to protect and promote the rights of individuals ("Data Subjects") and the Association.

3. Definitions

"Personal Data" Any information which relates to a living individual who can be or may be identified from that information for example: A person's name and address (postal and email), bank details.

"Sensitive Personal Data**" -** Any information relating to an individual's:

- political opinions
- racial or ethnic origin
- religion
- membership of a trade union
- health
- sex life
- criminal activity

"Data Subject" - Any living individual who is the subject of personal data whether in a personal or business capacity.

"Data Protection Officer" – An individual who is responsible for managing and auditing the data compliance, and is able to report directly to the board.

4. Our Obligations

1. The Association will collect, store and process information in its delivery of services to the public and its staff
2. The Association's Board will appoint the Senior officer to the role of Data Protection officer.
3. Staff will not gain access to information that is not necessary to hold, know or process. All information which is held will be relevant and accurate for the purpose for which it is required. The information will not be kept for longer than is necessary and will be kept secure at all times.
4. Staff will ensure that all personal or sensitive personal information is anonymised as part of any evaluation
5. Staff who manage and process personal or sensitive personal information will ensure that it is kept secure and where necessary confidential. Sensitive personal information will only be processed in line with the provisions set out in this policy.
6. Staff are responsible for notifying their line manager if they believe or suspect that a breach has occurred, or may occur in the future.
7. The Association will adhere to and follow the 8 principles of Data Protection and the Privacy & Electronic Communications (PEC) Regulations when conducting surveys, marketing activities etc. and where the Association collects, processes, stores and records personal data.
8. The Association will not transfer or share personal information with countries outside of the European Economic Area (EEA) unless that country has a recognised adequate level of protection in place in line with the recommendations outlined in the Act.
9. The Association will promote the awareness of the data protection and information security policies, procedures and processes among staff.
10. The Association will only use information for the purpose originally intended.
11. The Association will never sell the data it holds to other bodies.
12. The Association will only share data with partner bodies when it is in the interest of the data subject and with their consent*. Before sharing Data with another organisation the Data control will need to be satisfied the partners data protecting policy satisfies the controls needed to protect the data subject.
13. Consider whether any new activities require a data protection impact assessment is required, and complete if so.
14. The Association will ensure data subject are aware at the time of data collection that their data will be held and for what purposes it will be held.
15. The Association will ensure it keeps backups of data to ensure data subjects can be informed if their data is lost.

*Data may be shared without the consent or knowledge of an individual if it is done as part of the process for reporting a Safeguarding incident or concern, in line with WFCA Safeguarding policy.

5. Purposes for collection of data

The Association will collect data for a number of reasons in its daily operations. It will follow its obligations to ensure this is protected. Data collected falls under but is not limited to 5 areas, which the practice for outlined below. Where other data collections purposes are needed the Senior officer will set the practice for this data.

Membership

As a membership owned organisation and limited company WFCA is required by law to hold information on its members under the Companies Act 2006 this information forms the register of members. This forms the first of two elements of the membership database, the second element holds email and phone contact details to allow the association to keep members up to date with the organizations progress, at a lower cost than postage.

Members on joining the organization will be given the option to opt in or out of the second part of the database, but their data will be held on the register of members in line with the requirements.

The membership database is held on both the network with controlled access and in the general data cupboard.

Bookings

When taking bookings the Association is required to collect data on the individual whose booking is taking place, including photo ID when a bar is open, as set out in WFCA premises license.

General information held on the hire agreement for the booking will be kept in both paper and digital form.

When ID is taken a hard copy will not be kept and only a digital copy held on the secure bookings cloud area.

Information taken at the time of a booking for an event will only be used for the purpose of the booking being made and not for the purpose of marketing for future bookings or events.

Information taken at the time of a booking for a regular activity will only be used for the purpose of the booking being made, discussion development opportunities with the hirer but not for the purpose of marketing.

Childcare

As part of the Association's core activities storing information on children as part of a childcare provision is required. The Association will follow the guidance of its regulator OFSTED with regards to this.

Project Beneficiaries

The Association runs several grant funded projects for which reporting is required. When personal data is needed for this purpose the project beneficiaries on signing up to the project will be made aware and given the option to opt out of the data collections.

Without the express consent of the data subject, all reporting will be anonymous.

Marketing

When collecting data for any purpose the Association will give the data subject the additional option of having their contact details added to marketing lists, these may be specific to event types or generic.

6. Data Storage

Manual Data Storage

Personal information is likely to be collected in relation to hirings and other bookings, this information will be kept in either the reception office, or admin office.

Sensitive information is likely to collect in relation to grant funded projects such as the School Holiday Club provisions and in relation to employment. Sensitive information will only be stored in the Director of Operations office; only staff with data protection clearance will be able to access this room unaccompanied.

Digital Data Storage

Local storage – Data held locally (onsite) will be held on the Association's server, and CCTV system, not stored on portable devices without permission of the Data Protection Officer.

Access to personal data and sensitive data will be restricted to only those who need to have this access and not all users.

Cloud storage – The Association uses cloud-based storage for both sensitive and personal data. This will only be done using recognised cloud based storage providers offering high levels of security.

The Association will use multiple accounts for cloud-based storage to ensure access to any personal and sensitive data is not given to those who do not need access to this.

Passwords for accounts holding personal or sensitive data will score above 75%

7. Data subjects rights

The Association acknowledges the rights of the data subjects under GDPR and will at all times uphold these rights, being;

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Detailed explanations of the rights can be found in the ICO guidance.

8.Complaints

Individuals who wish to make a complaint relating to breaches of the General Data Protection Regulations and/or complaints that an individual's personal information is not being processed in line with this policy may do so in writing to the:

The Chairman, West Faversham Community Association, Bysing Wood Rd, Faversham, Kent, ME137RH

9.Distribution and review

This policy will be available to all staff and volunteers thought the staff and trustee intranets and paper copies held in the staff offices.

This policy will be publically available on the association website, or by request a copy will be made available for collection at reception.

It will be the responsibility of the Data Protection Officer to ensure version control on the above mentioned copies of this document.

This policy will be reviewed bi-annually by the board or recommendation of the Data Protection Officer, whichever is sooner.