

Data Protection Policy: Tandem Trekkers V1.0

Overview

Charities have had to comply with data protection legislation for over thirty years. This is to protect individuals and ensure that their data is only used for appropriate purposes. It also ensures that personal information will be held securely and confidentially. With this in mind Tandem Trekkers needs to ensure its activities conform to the general data protection regulations [GDPR] from 2018.

Organisations holding data must register with the Information Commissioners Office [ICO]. Not for profit organisations are exempt if data is used for:

- establishing or maintaining membership;
- supporting a not-for-profit body or association; or
- providing or administering activities for either the members or those who have regular contact with it.

This applies when the information relates to a core of regular users but if an organisation holds information based on casual contact it may need to register. Any organisation must test its activities against the data protection principles to determine whether or not it needs to register.

Some relevant Terms

Data – the information collected.

Data subject – the person whose information is collected.

Data controller – the person who decides what information is collected.

Data processing – the collection, storing or transfer of data.

Data processor – anyone who handles or manipulates the data.

Data protection officer – Tandem Trekkers doesn't need one.

Eight Principles of Data Protection

The eight principles of data protection are:

Principle 1 - Fair and Lawful

The information is only held for reasonable use and in ways that an individual would expect it to be used.

Principle 2 – Purposes

The information should only be held for the intended purpose and the organisation should be clear about what these are.

Principle 3 – Adequacy

The organisation should only hold the information it needs to perform the stated functions e.g. telephone numbers and email addresses to contact members about events.

Principle 4 – Accuracy

This has more relevance when the database holds information such as career histories or medical records. These should obviously be up to date.

Principle 5 – Retention

Data should only be held for the period for which it is useful and should be safely disposed of after this date. For Tandem Trekkers holding out of date data may result in former members or enquirers receiving unwanted communications.

Principle 6 – The rights of individuals

Individuals have the right to demand that data is accurate and to know what is held and be able to prevent direct marketing.

Principle 7 – Security

Information must be held securely both in the physical and on line sense.

Principle 8 – International

This is not relevant as Tandem Trekkers does not use information on an international scale.

There are also ***Legitimate Interests*** to consider, these only relate to life or death incidents or where justice needs to be administered. Also, ***Sensitive Information***; for Tandem Trekkers purposes this will include health information that may be used by ride leaders to support riders or be aware of health risks in certain activities. This may include contact details for next of kin, etc. For Tandem Trekkers this would be strictly for internal use.

Tandem Trekkers data

The data Tandem Trekkers holds may comprise:

- contact details for members;
- basic health information;
- disability status;
- income status;
- a record of payments made to the organisation by individuals;
- a record of attendance at events;
- Contact details for next of kin.

How the data is used

With regard to members; the information is held for administrative purposes, to co-ordinate and organise activities and ensure the smooth running of the organisation. It is also used to ensure that Tandem Trekkers can offer safe and supportive activities. None of this information is sold or given to a third

party for marketing purposes. However, Tandem Trekkers may agree to mail out information on behalf of a third party when it feels this is in the interests of members. Fundamentally, the information is held and used in house and not externally.

With regard to non-members; Tandem Trekkers may collect contact details at events, this will be used to promote future activities or hold as evidence for funders. It will not be given to or otherwise used by third parties. Information collected will usually be restricted to, a name, a postcode, phone number, and / or email. This information will be regarded as time limited and deleted or disposed of at regular intervals.

The attached schedule considers the types of information held, the reasons for holding it and the persons who need access to it.

How the data is stored

With regard to members ; the information is gathered using paper forms and emails. The information may be collected physically but will be collated and stored digitally on a database. The database will be held by a worker and/or designated committee members. The data base will be on a secure computer and not in a publically accessible file or folder. Paper records will be held by the worker or designated committee member at home or in a secure cabinet in a shared office.

With regard to the public: Enquiries or registrations of interest may be held on a database as above or in physical records as outlined above.

Consent to manage information

At the point of collection [i.e. on documents, on the website, etc.] Tandem Trekkers will make clear what information is required, how and where it will be stored and who can view it. Anyone offering data will be given, shown or talked through the data protection policy or at least told how they can be given a copy. Any data collection processes, [e.g. membership forms] will explicitly request permission to hold, store and use the information for the intended purpose.

Anyone offering data will be made aware of their right to:

- Be made aware of any information kept.
- Change incorrect details
- Be removed from any database

Registering with the Information Commissioners Office [ICO]

The need for registration should be considered after checking against the eight principles of data protection.

After consideration of the above the self-assessment test for small organisations was taken on the ICO website on 14/12/17. This advised that Tandem trekkers was not obliged to register.

<https://ico.org.uk/for-organisations/register/self-assessment/y/N/Y/Yes/Yes/No/No/Non/Yes>

Schedule: Reasons for holding information, how it is kept and who will have access.

Types of information	How it is kept	Why it is kept	Who needs access
Personal ID, contact details	Access database Paper records Ride leader briefings	To enable Tandem Trekkers to contact members To enable ride leaders to contact members and next of kin	Worker Membership secretary Ride leaders
Health details	Access database Paper records Ride leader briefings	inform ride leaders of health needs. Allow the board from time to time to consider changes to policy to reflect need.	Worker Membership secretary Ride leader
Financial details	On secure bank account website	To make petty cash and expenses payments	Treasurer Worker Other bank account sigs
Attendance at events	Paper records Database	To enable TT to promote and encourage attendance at events	Worker Membership secretary