Tandem Trekkers General Data Protection Regulations [GDPR] policy

(Reviewed 08/03/2020)

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.

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 For Tandem Trekkers, holding out-of-date data may result in former members or enquirers receiving unwanted communications.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 online 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.

In relation to non-members: Tandem Trekkers may collect contact details at events, 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: name, 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 member(s). 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 | To inform ride leaders of health needs.  To 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 |