



Distington Big Local

General Data Protection Regulation Policy

(GDPR)

Overview

General Data Protection Regulation (GDPR)

Under the GDPR, the lawful bases we rely on for processing this information are:

- We have a contractual obligation.
- We have a legal obligation.
- We have a legitimate interest.

How we store your personal information

Your information is securely stored on Distington Big Local's IT systems which are password and pin-lock secured. Any paper records that we keep are stored away in a locked cabinet. We keep your personal information for the time period determined by Distington Big Local which is at the end of the DBL contract. We will then dispose of your information by the secure wiping of the data from the IT storage systems and shredding any confidential data.

In the course of working for Distington Big Local, workers may come in contact with and use personal information about people i.e. names and contact details or information on health,

families, circumstances or other private matter. This policy helps to ensure that Distington Big Local's workers do not breach the GDPR. If you are in any doubt about what you may or may not do, seek advice from DBL Chair/Business Support, if unsure about anything, do not disclose any information.

Internal

We will collect, hold and process information consisting of personal data about all workers. They will be referred to as 'data subjects'. The purpose for which we hold any information about data subjects is for use solely for administrative and personnel management purposes, including but not limited to recruitment, appraisals, performance, promotion, training, career development, pay and remuneration, pension and insurances and other benefits, payroll, tax, national insurance, other deductions from pay, health & safety, discipline and grievances and HR policies, where applicable.

External

Distington Big Local also holds information on organisations and individuals who use our services/ engage with us and our work. It is the personal data that is protected by the regulation, not the organisational data. Work addresses and names of organisation officers are not considered to be personal information under the GDPR.

Individuals coming to Distington Big Local as volunteers are informed upon registration that their details are kept in accordance with the GDPR and that their details are held securely and confidentially. They are also informed that their details will not be passed on to another organisation without their consent.

Responsibilities

Business Support, Chair Person, Safeguarding Lead and Board members must ensure that the company's operational procedures comply with this policy.

All workers must comply with the operational procedures and ask for help if necessary.

Distington Big Local is committed to ensuring that all involved with the Company understand their responsibilities under the GDPR. This will be done by ensuring that this policy is received, read and understood by all staff and volunteers.

Personal Data

Personal data is any information that can be used to identify a person. This could be a name, photograph, address, phone number or email address. It could be held electronically or in other forms such as paper, photographs etc. GDPR applies to all our personal data

processing activities and everyone whose data we hold. This includes employees, volunteers, and members of our community, residents, supporters and donors. They are known as our 'data subjects'. 'Data processing' means anything we may do with the data, including collecting or receiving, recording, storing, consulting, sharing, backing-up, updating, sending and deleting.

SPECIAL CATEGORIES OF PERSONAL DATA

This includes information concerning an individual's race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for identification purposes) health, sex life or sexual orientation.

The purpose for which we hold sensitive personal data about data subjects is for use solely for equal opportunities monitoring or for the provision of specific services to individuals, including, but not limited to: suitability and fitness for work, sick pay and sick leave, absence control, maternity leave and pay, paternal leave, safe environment and obligations under the Disability Discrimination Act.

PERSONAL DATA MUST BE

Processed lawfully, fairly and transparently. There must be a legitimate reason for holding the data and it is processed in a way that the data subject would reasonably expect and understand.

Collected for a specific purpose and not used in a way that is incompatible with this purpose. We will only process data for the purpose for which it was collected.

Adequate and relevant. We will only collect the data that we need.

Accurate & up to date. We will take reasonable steps to ensure that the data is accurate & updated as necessary.

Kept for no longer than necessary. We will delete (or if needed for record keeping purposes, archive) data that we no longer need.

Processed in a way that ensures personal data is kept secure, including protection against accidental loss. Data will be restricted on a need to know basis. The level of security of the data is commensurate to the risk to the data subject of unauthorised access. Special categories of data should be subject to a high level of data security.

WHEN CAN WE PROCESS PERSONAL DATA

To be compliant with GDPR we must have a least one valid reason for using or processing the personal data. These include but are not limited to:

Consent from the person we have collected the data (for consent to be valid, the data subject must be fully informed of the envisaged data processing activities and have clearly indicated their consent)

A contract or service level agreement with the data subject that requires us to process their personal data in order to fulfil contractual obligations

A legal obligation for example the maintenance of financial records for possible inspection by tax authorities, or measures concerning safeguarding

A 'legitimate' interest' in processing the data on the part of the controller. This is the most flexible basis for processing and is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have minimal privacy impact of where there is a compelling justification for having that data

The purpose for which we hold any information about data subjects after the end of employment/ involvement with DBL is for use solely for any residual employment and volunteering related matters including but not limited to provision of references, processing applications for re-employment, matters relating to retirement benefits and allowing us to fulfil contractual and statutory obligations.

THIRD PARTIES

If necessary for the above purposes, we may transfer personal data to our subsidiary and associate companies, insurers, bankers, legal, medical and other professional advisors, administrators of our pension scheme or your own pension provider and other companies to which we have contracted work relating to the above purposes for which personal data is to be used.

GOOD PRACTICE

Distington Big Local will ensure that:

- Data is held and processed appropriately
- Everyone managing and handling personal information understands that they are responsible for following good data protection practice
- Everyone managing and handling personal information is appropriately trained to do so
- Queries about handling personal information are promptly dealt with
- A regular review and assessment is made of the way personal information is managed

Volunteers / workers have the right to request access to, and correction of, your personal data in relation to your work (voluntary or otherwise). If you wish to exercise these rights please contact Board Members/Business support

DBL expects all workers / volunteers with access to personal information to respect the needs for confidentiality and to avoid improper use or transfer of such information. Anyone who fails to adhere to these principles will render themselves liable to disciplinary action.