

# Brading Men's Shed Data Protection Policy



## Data Protection Statement

Brading Men's Shed is classified as a Data Controller under the General Data Protection Regulation (the GDPR) as enacted in the Data Protection Act 2018 and any subsequent relevant legislation or regulation. This policy outlines our commitment to protecting the personal data of people in relation to our organisation's work and carrying out any data processing with transparency, accountability and good governance.

## Main Contacts

Below are the Sheds main contacts for data protection in line with this policy. They should be your primary contact should you wish to discuss something related to data protection, or need further information.

## Data Protection Officers (DPOs):

The current secretary of the shed. [Secretary@bradingshed.uk](mailto:Secretary@bradingshed.uk)

The current chairman secretary of the shed. [chairman@bradingshed.uk](mailto:chairman@bradingshed.uk)

The DPOs' are volunteers of the Data Controller, and have responsibility for ensuring personal data is collected and processed lawfully in line with this policy and the relevant law, and is kept secure.

## Definitions

This policy uses the definitions in the Data Protection Act and the applied GDPR for the following key terms.

**Personal data** – 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; (A natural person is a human. Legal persons may include companies and partnerships.)

**Sensitive Personal Data (Definition under the DPA2018):** personal data consisting of information as to: the racial or ethnic origin of the data subject; their political opinions; their religious beliefs or other beliefs of a similar nature; whether they are a member of a trade union; their his physical or mental health or condition; his sexual life; the commission or alleged commission by them of any offence; or any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings. (whilst we do not need to know most of this information and much of it will never apply, members are asked to make a health declaration.)

**Data Controller** - a person who determines the purposes for information processing and the manner in which it is done.

**Natural Person** - an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Other key terms are defined within their sections.

## **Data Collection**

From time to time, we will need to process the following examples of personal data from volunteers, service users and other natural persons related to our work. We may also, at times, need to collect and process personal data not listed here. The following are some examples of the types of personal data we may collect and process.

- Name
- Contact information e.g. address, telephone numbers, email addresses
- Information about your age, gender, disability status
- Relevant Information about your skills, qualifications and expertise
- Relevant information about your health (such as may limit your use of shed equipment or that wich we may need to inform emergency personnel in the case of collape, seizure or other medical emergency.)

We may use this information to:

- Manage memberships
- Handle complaints

- Improve our services
- Carry out administration functions
- Get help if somebody is in danger e.g. contact next of kin if an accident or emergency occurs
- Liase with emergency workers in the case of an emergency. (medical or otherwise)
- Comply with legal obligations

In line with the GDPR, Brading Men's Shed has a lawful basis for collecting personal data (including the vital interests of the members) but will also ask for and record individual members' consent prior to collecting and processing data for certain purposes and provide clear and concise privacy notices to provide information on how and why we are collecting and processing particular data. Brading Men's Shed will ensure it provides ongoing opportunities to give or revoke consent where appropriate and necessary in line with the GDPR. Brading Men's Shed's privacy notices will also state clearly our lawful basis or bases for collecting the data in each instance that we collect and process it. This will be in line with the six documented legal bases of the GDPR; consent, contract, legal obligation, vital interests, public tasks or legitimate interest.

Brading Men's Shed will maintain a live log of the exact types of data, reasons and lawful basis for collection and processing which allows us to demonstrate our compliance with the GDPR with the ICO, if ever necessary.

Brading Men's Shed will never, under any circumstances, use personal data to discriminate against a person for any reason.

Brading Men's Shed will audit personal data on file on an annual basis to ensure it is still relevant, needed and lawfully held. If ever we need to use data for another purpose, we will make sure we inform and/or request consent from the relevant persons, in line with the GDPR.

Brading Men's Shed will carry out a Data Protection Impact Assessment (DPIA) prior to implementing any new data handling technology and/or where processing personal data is likely to significantly affect individuals.

### **Data Handling**

Brading Men's Shed understands its obligations under the GDPR, when collecting, controlling and managing personal data. We will ensure that we:

- process data lawfully, fairly and in a transparent manner.

- collect data only for specified, explicit and legitimate purposes and not further processing in a manner that is incompatible with those purposes.
- process data adequately, relevant and limited to only what is necessary.
- ensure personal data is accurate and kept up to date, rectifying and erasing any errors or inaccuracies without delay.
- will keep personal data in a form that permits identification of individuals for no longer than is necessary for the purpose.
- process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against loss, destruction or damage.

As a data controller and in line with the GDPR, we will keep a record of our processes, consistent with the above and be able to demonstrate our compliance at any given time.

### **Data Storage and Security**

Brading Men's Shed takes the matter of safety of personal data very seriously and will always ensure we put in place robust safety measures, appropriate to the type of information we hold and process.

In order to secure personal data kept by Brading Men's Shed we will use a mixture of the following methods, appropriate to the data held.

- Physical security including good quality doors and locks, alarms, security lighting and CCTV at the BYCC.
- Computer security including passwords, encryption or two-factor authentication and physical security of removable storage modules.

We will check our storage and security practices regularly to ensure they are in line with regulation and appropriate for the personal data held. We will build a culture of awareness and security within the Shed ensuring good communication with key people, and we will only ever provide access to personal data for people that need it for lawful processing.

The exact way we store personal data for each purpose will be documented in our Data Protection Log.

### **Individual Rights**

Brading Men's Shed is aware of the rights for individuals whose personal data we hold. In line with those rights we will ensure we process data in accordance with these rights. We will:

- Be transparent and inform them of how and why we will process their personal data, as well as the lawful basis for doing so.
- Respond within 30 days if people ask to access their personal data, allowing them to verify its lawful collection and processing.
- Rectify any inaccurate or incomplete personal data without delay.
- Erase any personal data when it is no longer needed or there is no lawful reason for it being held.
- Take immediate action if an individual requests that we suppress the processing of their data or objects to its collection, retaining just enough to respect their wishes in future.
- Never process personal data for more than its lawful, documented purpose(s).
- Obtain clear, active consent from each individual where we are lawfully obliged to do so.

## **Data Breaches**

Brading Men's Shed recognises the GDPR's guidelines to record, rectify and report, where necessary, data breaches; where a breach of security leads to the destruction, loss, alteration or unauthorised disclosure of, or access to, personal data.

Brading Men's Shed's DPOs are allocated the responsibility for minimising the likelihood of breaches and taking prompt action if ever they happen. Brading Men's Shed will ensure it notifies the individuals whose data is involved if there is any adverse risk to them as a result of the breach, and where necessary notify the Information Commissioner's Office (ICO).

### Accessing Information

Under the GDPR, individuals have the right to access the information held about them. If you would like to request information held, or be reminded of the reasons, lawful basis and methods of keeping your personal data, please send a request in writing to the Secretary by hand or to [Secretary@bradingshed.uk](mailto:Secretary@bradingshed.uk)

We will respond to all requests within 30 days.

## **The Information Commissioner's Office (ICO)**

The ICO is "the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals" (ICO website). It is responsible for administering the provisions of the GDPR. Under the GDPR, organisations must register with the ICO unless exempt.

Brading Men's Shed is exempt from registering with the ICO because is it a non-profit making organisation.

Brading Men's Shed only:

- processes information necessary to establish or maintain membership or support.
- processes information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it.
- shares the information with people and organisations necessary to carry out the organisation's activities unless given permission otherwise.
- keeps the information while the individual is a member or supporter or as long as necessary for member/supporter administration.