



GENERAL DATA PROTECTION REGULATIONS (GDPR) POLICY

Policy ACC-006

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Revision History

Revision	Revision Date	Document Status	Revision Comments	Author	Approved by
	22/01/2020	Document creation		S Shotter/ K Gledhill	
	01/06/2020	Revision	Data Retention Schedule Added	Rebekah Cannon	Board of Trustees 22/07/2020

Definitions

Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of people, and comply with the law, when collecting, storing, using, amending, destroying or deleting personal data.

Responsibility

Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing the activities and ensuring this policy is upheld.

All staff and volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

A copy of this GDPR Policy will be kept in a box held by each of our Session Leaders and is present at each Aspire session. A hard copy is available to view in our office and electronically via our website www.aspirecreatingcommunities.org.uk

Overall policy statement

Aspire Creating Communities needs to keep personal data about its committee, members, volunteers, staff and supporters in order to carry out group activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways that protect people's privacy and comply with the General Data Protection Regulations (GDPR), European Union, May 25, 2018, replacing the Data Protection Directive 95/46/EC.

We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store and or use data we do not need.

We will only collect, store and use data for:

- Purposes for which the individual has given explicit consent, or
- Purposes that are in the group's legitimate interests, or
- Contracts with the individual whose data it is, or
- To comply with legal obligations, or
- To protect someone's life, or
- To perform public tasks

We will provide individuals with details of the data we have about them when requested by the relevant individual.

We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.

We will endeavour to keep personal data up to date and accurate.

We will store data securely. Personal records are stored securely as hard copies within a locked cupboard in the Aspire office and electronically as a password protected file within the charity's google drive account. Access is restricted to the individual concerned and another appropriate member of staff within the organisation. Once staff or volunteers leave, their personal records will be destroyed in line with our GDPR Data Retention Schedule.

We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.

We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our committee, volunteers and staff to follow.

GDPR Data Retention Schedule

GDPR states personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. We retain data while it is still current and afterwards for the duration set out in the table below. After this period all forms of data will be deleted from our systems.

Confidentiality Statement

This policy is to be read in conjunction with ACC-016 Confidentiality Policy


Description of Data	Duration of Retention (years after the calendar year to which they relate)
Staff Records	1 year
Volunteer Records	1 year

Service User Records	1 year
Accident Reports	3 years
Gift Aid Declarations	6 years

Review

This policy will be reviewed every two years

This policy has been formally agreed and adopted by the Trustees of Aspire Creating Communities. This policy will be reviewed bi-annually by the Trustees who are also responsible for the implementation of this policy.

Policy Number	ACC-006	Signed: 
Policy Title	GDPR Policy	
Author (s)	Susanna Shotter / Karina Gledhill	
Date Written	22/01/ 2020	Position: Aspire Creating Communities Chair of Trustees
Review Date	22/01/2022	