



COMMUNITY MINIBUS ASSOCIATION (WEST SUSSEX) GUIDANCE FOR VOLUNTEERS DEALING WITH PERSONAL DATA

In accordance with the Charity's Data Protection Policy (See copy attached/ at Appendix 1) the Association is fully committed to the safe storage, processing and use of personal data relating to all Members*, and others. It will comply with both the spirit and the letter of all current and future regulatory requirements relating to this issue including the following:

- The Data Protection Act 1998
- The General Data Protection Regulations (GDPR) 2018
- The Data Protection Bill 2017 (when enacted)

This guidance is intended to help all those volunteers who deal with the personal data of Members, donors and others to comply with the charity's responsibilities under the Acts and Regulations:

DEFINITIONS

"Personal data" is any information which enables an individual to be identified. In our charity this is mainly names, addresses, email addresses and telephone numbers. The charity may also hold relevant **"sensitive personal data"** (described as **"special categories of data"** in the GDPR), typically medical conditions or driving offences.

"Processing" personal information includes collection, recording, storing, retrieval, consultation, use, disclosure and destruction. The Act applies to all personal information whether stored electronically or on paper in manual filing systems.

COLLECTION

Personal data should only be collected using the Association's Membership Form or the Trustee/Senior Volunteer Registration form. Copies of completed forms should be retained as evidence of consent and forwarded to the Membership Secretary either in paper or electronic format. If sent in electronic format, the paper copy should be safely stored and shredded when no longer required.

PROCESSING

The main depository of personal data is the Association's Membership database which is synchronised with the Storrington database.

Wherever practicable, those volunteers who have access to the Association's Membership database should use it to access Members' personal details. Other electronic or paper-based storage systems should only be used where necessary for the efficient operation of the charity.

Where Members' personal details are recorded electronically on personal devices both the devices and files must be password protected and the devices must also be protected by reputable anti-virus software. The files should not be accessed using unsecured WIFI systems. Adequate measures should be taken to ensure the physical security of such devices. For example, they should not be left on view in an unattended vehicle.



Paper records of personal data (for example passenger lists for trips) should be treated as confidential, securely stored and should be shredded when no longer required.

Current Membership forms have been amended to take account of the new requirements of the General Data Protection Regulations which are due to come into force in May 2018. Under these Regulations Members must give their explicit consent to receiving general or fundraising information about the Charity. Members who do not provide consent should not receive such information. They must also give their explicit consent to the storage of sensitive personal data.

SHARING PERSONAL DATA

The personal data of a Member should not be shared with a third party without their explicit permission. Any request to supply information to a third party without the individual's consent should be in writing and must be referred to the Association's Secretary. It is recognised that in exceptional circumstances it may be necessary to share personal data with the emergency services in the interests of a Member's safety and wellbeing.

Next-of-kin or other emergency contact details supplied by a Member should only be used in an emergency. If it is considered advisable to contact the next-of-kin in other circumstances in the interests of a Member's well-being the permission of the Member should normally be obtained. If this is not possible you should contact your Divisional Organiser.

PUBLICITY MATERIAL

When publicity material is produced care should be taken to ensure that anything which enables an individual to be identified (for example a photograph) should only be used with the explicit consent of that person.

REQUESTS FROM MEMBERS

Individuals are entitled to know what personal data is held about them. Requests may be dealt with informally by Divisional Organisers in the first instance but if a formal written Subject Access Request is received it should be passed to the Association's Secretary.

POTENTIAL DATA BREACHES

If there may have been a potential breach of Data Protection rules (for example if a tablet or mobile phone is lost or stolen) the Association's Secretary should be contacted immediately to decide on the appropriate action to be taken. (Potential Data Breaches should be reported to the Information Commissioner's Office within 72 hours).

RETENTION

Personal information must be removed promptly from all personal devices and paper files must be destroyed at the request of a Member or when Membership ceases. If a Member has been involved in an accident or incident or If it is felt that there is another reason to retain information relating to a specific individual after Membership has ceased, please refer to your Divisional Organiser.



When Membership ceases personal data will normally be removed from the Membership database after 3 years. In exceptional circumstances (for example if a Member has been involved in an accident or incident) the retention of personal data for a longer period may be approved by the Trustee Board for a period and in a format and location to be determined by the Board.

**** In this guidance the term Member includes "Associate Member", "Member" and "Associate Group Member"***



APPENDIX 1

COMMUNITY MINIBUS ASSOCIATION (WEST SUSSEX) - DATA PROTECTION POLICY

The Community Minibus Association (West Sussex) is fully committed to the safe storage, processing and use of personal data relating to Members* and others. It will comply with both the spirit and the letter of all current and future regulatory requirements relating to this issue including the following:

- The Data Protection Act 1998
- The General Data Protection Regulations (GDPR) 2018
- The Data Protection Bill 2017 (when enacted)

The Association will only collect personal data which is necessary for the pursuance of its charitable objects and will process data in accordance with the following principles:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained for one or more specified and lawful purposes and will not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data will be adequate, relevant and not excessive in relation to the purpose for which it is processed.
4. Personal data will be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose will not be kept for longer than is necessary for that purpose.
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and General Data Protection Regulations 2018
7. Appropriate technical and organisational measures will be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

The Community Minibus Association (West Sussex) is the “Data Controller” for the purpose of the legislation. The Association’s Secretary will be the point of contact for all data protection issues.

The Association will only collect personal data which is necessary for the performance of a contract or is provided with the explicit consent of the Data Subject.

Sensitive personal data (referred to as “special categories of data” in the GDPR) such as medical information will only be processed with the explicit consent of the Data Subject.

Information about individuals will not be disclosed to any third party without the permission of the individual, unless disclosure is required to comply with legal or statutory requirements.

The Association will provide written guidance for all volunteers who deal with personal data.

ACCESS REQUESTS

If requested to do so in writing the Secretary on behalf of the Association will:



- Confirm whether personal data relating to the subject of the access request is being processed;
- Provide a description of the personal data, the reasons for which it is being processed, and whether it will be given to any other organisations or people;
- Provide a copy of the information comprising the data; and give details of the source of the data (where this is available).

The Association will respond to access requests as soon as possible and within 30 days at the latest.

PRIVACY NOTICE

The Association will publish a privacy notice which will be made available to individuals when they provide personal data explaining the purpose of the processing and the right of the data subject to withdraw consent at any time.

RETENTION

Personal data will not be retained for longer than is necessary and will normally only be retained for 3 years after Membership has ceased. In special circumstances data may be retained for a longer period and for a specific purpose or purposes to be determined by the Trustee Board and in a format and location to be determined by the Board.

* In this policy the term Member includes Members and Associate Members as defined in the Charity's Constitution.

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