

DEWSBURY & DISTRICT THIRD AGE

DATA PROTECTION POLICY

1. Dewsbury & District Third Age, hereinafter referred to as “the Group” recognises its responsibilities under the principles of the General Data Protection Regulations (See Appendix A) and will only hold information for specific purposes and will not hold information about individuals without their knowledge and consent.
2. The Registrar is designated as the “Data Controller” for the Group and is the principal person who holds information about individual members, such as name, address, telephone number(s), email address, which class they have enrolled and paid for and whether they are taxpayers for the purpose of Gift Aid. Electronic copies of the membership data are held by two designated members of the Committee for security back-up purposes only.
3. The Data Controller will produce a register for each class which contains limited personal data to enable each class tutor to be able to take a weekly attendance register, contact their class members in case of a class needing to be cancelled, to discuss any attendance difficulties as well as in the case of emergency. Tutors will not disclose any personal details about an individual to any other member of their group. If a member of the class is taken ill or is injured during the class, then it may be necessary to disclose that member’s personal details to a member of the Emergency Services if the person is unable to communicate for themselves.
4. Members complete a new membership form at enrolment each year to check that the data held about them is current and up to date and to obtain their consent to the Group holding their data for the above purposes. Consent is also sought as to whether they are happy to be photographed for the purposes of publicising the activities of their class.
5. The members of the committee are provided with a list of tutors for the current year with contact details as well as a list of Trustees / co-opted members for the purposes of fee collection and arranging publicity events across the Organisation. Each class has a nominated committee member to deal with any queries or enquiries pertaining to that group.
6. The Group will not disclose any information about members to any other organisation or to individuals.
7. Members (data subjects) will be entitled to have access to information held about them by the Group and for what purpose within 40 days of submitting a request to the Data Controller.
8. Committee members / Trustees have personal procedures for ensuring the security of all electronic personal data. Paper records containing confidential personal data are disposed of in a secure way within 24 months of the end of the current programme year. Gift Aid declarations must be retained for 6 years.
9. In line with all Dewsbury & District Third Age policies, this policy will be reviewed annually or when the situation dictates
10. This policy should be read in conjunction with the Complaints, Equality & Diversity, Health & Safety, Safeguarding and Volunteer policies.

Appendix A – Principles of the General Data Protection Regulations 2018

Article 5 of the GDPR sets out seven key principles which lie at the heart of the general data protection regime.

Article 5(1) requires that personal data shall be:

“(a) processed lawfully, fairly and in a transparent manner in relation to individuals (‘lawfulness, fairness and transparency’);

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (‘purpose limitation’);

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals (‘storage limitation’);

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).”

Article 5(2) adds that:

“The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 (‘accountability’).”