

Sedgefield Arts, Recreation and Community Association (CLO)

General Data Protection Regulation Policy

1. Introduction

In order to conduct its business, services and duties Sedgefield Community Association processes a wide range of data, relating to its own operation and some which it handles on behalf of partners. In broad terms this data may be classified as :

- Data shared in the public domain regarding the services it offers
- Confidential information and data not yet in the public arena
- Confidential information about its sections due to commercial and sensitive nature
- Information on individual members and sections
- Personal data concerning Trustees, current, past and potential employees and volunteers
- Personal data concerning individuals who contact it for information to access both services and facilities

Sedgefield Community Association will adopt procedures and manage responsibly, all data which it

will also maintain its contractual obligations towards confidential data from suppliers and hirers of its facilities. It confirms it will abide by any specific legal responsibilities it has in regards to personal and sensitive information under data protection legislation.

2. Protecting confidential or sensitive information

Sedgefield Community Association recognises it must at all times retain and process sensitive and personal information about its sections, volunteers, users and the general public. This policy adopted reflects this commitment.

3. Policy principles

- Processed fairly, lawfully and in a transparent manner in relation to the data subject
- Collected for specified, explicit and legitimate purposes relevant to the role of the Association
- Accurate and where necessary, kept up to date
- Kept in a format that permits identification of data subjects for no longer than is necessary for the purposes for which it is required
- Processed in a manner that ensures appropriate security of the data and including protection against unauthorised or unlawful processing against accidental loss, destruction or damage.

4. Data Protection Terminology

Data Subject :the person whose personal data is being processed. It may be a Trustee, volunteer, section, individual member, employee, contractor or potential service user hirer.

Personal Data :any information relating to a person or data subject that may be used directly or indirectly to identify the person. It may be anything from a name, a photo, an address, date of birth, an email address, bank details, posts on social networking sites or a computer IP address.

Sensitive Personal data ; includes information about racial or ethnic origin, political opinions, religious or other beliefs, medical information, sexual orientation, genetic and biometric data or related to offences or alleged offences where it is used to uniquely identify an individual.

Data controller : means a person who (either alone or jointly, or in common with other persons) determines the purposes for which and the manner in which any personal data is to be processed. In the case of Sedgefield Community Association, the Board Secretary.

Data processor: in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller, including Treasurer, Facilities Manager, Membership Secretary, Letting Officer and Section Officers.

Processing information or data : this means obtaining, recording or holding the information or data, carrying out any operation or set of operations on the information or data, including organising ,adapting or altering it, retrieving, consulting or using the information or data, disclosing the information or data by transmission, dissemination, or otherwise making it available, aligning, combining, blocking, erasing or destroying the information or data regardless of the technology used.

Sedgefield Community Association will use Personal data in order to fulfil its duties as a employee, pursue the legitimate interests of its business, users and members, monitor its activities including equality and diversity of its activities, fulfil its duties in operating the business premises including security, process information including the recording and updating details about its members, sections, Trustees and users, undertake surveys, censuses and questionnaires to fulfil the objectives of the charity.

5. Processing personal information: Sedgefield Community Association will ensure the following conditions are met for personal information to be considered fairly processed

- The individual has consented to the processing
- Process is necessary for the performance of a contract, agreement, hire
- Processing is required under a legal obligation
- Processing is necessary to protect vital interests of the individual
- Processing is necessary in order to pursue the legitimate interests of the data controller or third parties
- Processing is in the interest of the Chairty in ensuring its aims and objectives are met.

If the information is of any sensitive personal information Sedgefield Community Association will ensure explicit consent of the individual has been obtained, required by law to process the data, a requirement in order to protect the vital interests of the individual or another person.

6. Officer designated to protect data:

Sedgefield Community Association as a Charity and a corporate body it has ultimate responsibility for ensuring compliance with the Data Protection legislation. The Board of Sedgefield Community Association has delegated this day-to-day responsibility to its Board Secretary Mrs. Patricia Buckley-Atkins.

Insert here Pats contact details

7. Diversity Monitoring:

Sedgefield Community Association monitors the diversity of its members, sections and hirers in order to ensure there is no inappropriate or unlawful discrimination in the way it and its sections conduct its activities. The principles of PREVENT are embedded in its hire policy. This data will always be treated in a confidential nature and will not be disclosed to any other body or individual. Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8. Information provided to Sedgefield Community Association

Information provided, (personal information such as name, address, email, phone number) will be processed and stored so that it is possible for the service to be provided and to contact, respond to or conduct the transaction requested by the individual. By contacting Sedgefield Community Association individuals are deemed to be giving consent for the use of the data, however wherever possible specific written consent will be sought. It is the responsibility of the member or user to ensure the charity is able to keep their personal data accurate and up-to-date. The personal data will not be shared or provided to any third party and will be only used for the purpose that it was provided for.

9. Information Security:

Sedgefield Community Association will ensure the security of all personal data. We ensure information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. Data will only be retained for the purpose it was collected for and only for as long as it is necessary, after which it will be deleted. We will not process any data relating to a child (under 13) without the express parental/guardian consent of the child involved.

10 Rights of a Data Subject:

- **Access to Information** : an individual has the right to request access to the information Sedgefield Community Association has on them.
- **Information correction** : If the individual wishes Sedgefield Community Association will delete the information about them, by contacting Mrs. P. Buckley-Atkins Board Secretary
- **Information Deletion**: If an individual wishes Sedgefield Community Association to delete the information about them, they may do so by contacting the Board Secretary Mrs. P. Buckley-Atkins.
- **Right to object** : If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting Mrs. P. Buckley-Atkins Board Secretary
- **Complaints**: If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Board Secretary Mrs. P. Buckley Atkins.

Sedgefield Community Association will ensure that individuals on whom personal information is retained are aware of their rights and have easy access to the information on request.

10. Making Information Available

Sedgefield Community Association has a Publication Scheme which details all relevant information it routinely provides.

This Policy will normally be reviewed bi- annually however it may require earlier review depending on changes to law

Approved 31st March 2025.

Sedgefield Community Association

Retention of Documents and Records Policy

Introduction

Sedgefield Community Association recognise that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Charity. This policy framework will cover

- Scope
- Responsibilities
- Relationship with existing policies
- Retention schedule

Scope

This Policy applies to all records created, received or maintained by Sedgefield Community Association in the course of carrying out its functions. Documents are defined as all of those documents which facilitate the business carried out by Sedgefield Community Association and which are thereafter retained (for a set period) to provide evidence of its transactions or activities.

These records may take different forms:

- Letters received from third parties
- Copy letters sent out by the Association
- File attendance notes
- Minutes
- Invoices
- Financial records
- Registers
- Membership forms/details
- Contracts/deeds
- E-mail communication
- Photographs
- Section records
- Health and Safety records
- Accident Book

Sedgefield Community Association may need to retain specific documents to fulfil statutory, Charity Commission, evidence events/agreements in case of dispute, meet operational needs, and preservation of documents of historic or other value. The untimely destruction of documents may cause Sedgefield Community Association difficulty in defending litigious claims, operational problems, embarrassment, failure to supply information to Charity Commission.

Responsibilities

Sedgefield Community Association have a responsibility to maintain its records and record management systems in accordance with the regulatory environment. The designated officer with overall responsibility for this policy is Mrs. P. Buckley-Atkins Board Secretary. The Board Secretary will ensure conformity with the policy and Charity Commission Guidance. They will ensure that records are accurate, maintained and disposed of within these guidelines and a record maintained of all documents destroyed.

Retention Schedule

The Retention Schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. The Retention Schedule refers to record series regardless of the media in which they are stored. The Board Secretary Mrs.

P. Buckley-Atkins is the owner of the Retention Schedule and responsible for all aspects of retention and destruction in accordance with the schedule.

Retention Schedule

<u>Document</u>	<u>Minimum Retention</u>	<u>Reason</u>
Minutes	Indefinite	Legal Requirement
Agendas	Indefinite	support minutes
Correspondence (Major)	Indefinite	for reference
Reports/papers	Indefinite	for reference
Notes from meeting	Shred after typing	not legal document
Routine correspondence	ten years	for reference
e-mails	if needed retained or destroy each week	reference only
Invoices	Indefinite	audit/CC
Employee	2 years after employee leaves	recommended CC
Receipt/Payments	5 years	future reference
Annual Returns	Indefinite	legal requirement/CC
Bank papers	10 years	recommended CC
Contracts	10 years	in case of a claim
Audit budgetary control	10 years	audit
Quotations/tenders	5 years	reference only
Trustee details	5 years	CC
Insurance cert/policies	Indefinite	in case of claim
Insurance claim documents	Indefinite	in case of claim
Title/deeds/lease	Indefinite	legal requirement
Register of interest	destroy after trustee stands down	only current info
Complaints	5 year	in case of claim
Disciplinary documents	5 year	in case of claim