

GENERAL DATA PROTECTION REGULATION

There are though 6 main principles for holding Data that we should follow

Date held should be:

1. Fair lawful and Transparent
2. Compatable and specific
3. Adequate Relevant and Limited to what is necessary
4. Accurate and Rectifiable - - any person has the right to check the data held on them
5. Retained for no longer than necessary
6. Stored with integrity and confidentiality

A useful phrase to always have in our heads which covers the above and is self explanatory to pass on to others is

‘ As little info about as few as possible for as short as possible’

The size of the organisation and the data collected does not fit the need for us to have a designated Data Protection Officer.

The systems we put in place need to be Opt In not Opt Out though we can apparently assume consent if for instance someone replies via phone or email that they will do whatever was asked but does not mention opting in even though there would have been a box on their reply form to opt in.

We worked through the Compliance Overview Workbook to highlight what we hold data wise and what we should put in place to comply

Data Mapping:

1. Identify your data collection points
 - Contest Registration Cards
 - Membership Forms
 - Gift Aid Forms
 - Through the Band Secretary
 - Through the Beer Festival Organisers
 - iZettle

2. What Data is collected?

- 1 - Membership Information Names, Addresses, emails, phone numbers, ages DOB, bank details, Emergency Consent Forms
- 2 - Deps names, phone numbers, emails
- 3 - Sponsors names, addresses, phone numbers and emails
- 4 - iZettle – names, email addresses, bank details???
- 5 - Ex players names, phone numbers and emails normally people who have kept up their interest in band this should all class as a legitimate interest which is ok
- 6 – Gift Aid Information

3. Is a privacy or consent form used at point of collection (Numbers as above)

1. Yes but needs updating – Opt in- need new statements to cover use of photos and information for sharing for emergencies etc. Develop forms that include opt ins for emergency contacts and photos.
2. No – need to agree some wording for an Opt in box to be put on all emails/letters sent out as standard to Deps, Sponsors, Ex-Players etc.
3. No – as above plus a suggestion made that to cover this aspect from the start we maybe should just write to them all explaining the new regulations and asking if they are happy to opt in – opt in email etc (they'll be expecting it as will have had an email from every other company etc.
4. Not sure on this one???
5. No – as No 3
6. No – need to agree some wording for an Opt in box to be put on all

4. Identify the Database and or files the data is added to

- 1 – Registration Cards
- 2,3,5 – Create one database to be password protected that would have different tabs for different categories. Also hold an opt out page where just the names of people who had requested their data could not be kept (or hadn't responded to the opt in) could be held for reference
- 4- Not sure how this information is stored
- 6 – Forms need to be stored securely in a locked box until they are processed.

5. What is the data used for

- The day to day running of an organisation

6. Identify and record who can access the data internally

- Chairman
- Vice Chairman
- Secretary
- Contest Secretary
- Beer Festival Organiser
- Conductor
- Safeguarding Officer

7. Understand Third Party data sharing?

- As far as I'm aware we don't pass information to any other organisation.

8. How and when is data reviewed and updated

Annually – conduct an annual review of all data held

1 – Annual membership form that covers Membership Information Names, Addresses, emails, phone numbers, ages DOB, bank details, Emergency Consent Forms. Any member who has left the organisation within that year, their data is removed.

2 – Annual opt in Email - Deps names, phone numbers, emails

3 – Would need to remove any not used that particular year or move to just name kept on the data base and delete any other information held. Could include an opt in for the year on the thank you letter or initial sponsorship form. Sponsors names, addresses, phone numbers and emails

4 – Again not sure how this works?? iZettle – names, email addresses, bank details???

5 – Annual Opt in Email - Ex players names, phone numbers and emails normally people who have kept up their interest in band this should all class as a legitimate interest which is ok

6 – Each time claim made - Gift Aid Information – form destroyed within 48 hours of the claim being processed.

9. How long does your organisation keep the data for

For as short a time as possible, usually within 12 months, due to the reviews and updates as above. Accounts data is kept only as long as any of our legal requirements.

10. What is the policy on data deletion

All as part of the annual reviews

Electronic data is deleted from the database.

Hard copies are incinerated by the band secretary, treasurer, safeguarding officer who hold any confidential information

Implementing/Reviewing Privacy Notices

1. Where and how your organisation display privacy notices?

Need to design a privacy notice to put on Website and on all documentation sent out ie letters to sponsors etc.

Eg.

All the information we hold concerning you will be held and processed by us strictly in accordance with the provisions of the data Protection Act 2018?

Such data will only be used by us to administer our relationship with you and to provide you with information regarding our normal organisational activities. We will not without your consent supply your details to any 3rd party except where necessary for normal organisational activities or where required to do so by law.

You have the right under the Data Protection Act to obtain information from us regarding the data we hold on you.

Conditions for processing data

- a. Consent – to be asked for via letter/membership form
- b. Implied consent – if people have been asked via letter to opt in but ring reply or email reply without mentioning
- c. Legitimate interest – other federations e.g BBE, YHBBA, contest information

d. Necessary for contract – anything to do with the beer festival

Note If information is publicly available ie on websites or phone directories this information can be used. So for example if a new judge or sponsor was being looked at and we could say the information to get in touch with them was publically available – not word of mouth – that would be ok to go ahead and write including , of course, our Opt in statement

Membership forms for processing must always be stored in a locked cabinet and also afterwards, likewise for any paper with people's names and addresses on