***AYLSHAM COMMUNITY PARTNERSHIP***

**DATA PROTECTION POLICY**

# Introduction

The Aylsham Community Partnership (ACP) holds certain personal data about individuals for the purpose of maintaining the administration of its facilities and activities. The Directors of ACP recognise the importance of correct and lawful treatment of personal data.

The type of personal data that ACP may require includes name, address, telephone number, email address for volunteers, contacts for organisations, and others who provide a service to ACP. eg lecturers, photographers, contractors, researchers. This personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the relevant legislation.

The ACP Directors fully endorse and adhere to the six principles of the General Data Protection Regulations (GDPR) and expect staff and volunteers to do likewise. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation, and storage of personal data.

# Principles

The principles require that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;
5. 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; and
6. 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.  
     
   The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

**Satisfaction of principles**

In order to meet the requirements of the principles, the ACP Directors and staff will:

* Observe fully the conditions regarding the fair collection and use of personal data;
* Meet its obligations to specify the purposes for which personal data is used;
* Collect and process appropriate personal data only to the extent that it is needed to fulfil operational or any legal requirements;
* Ensure the quality of personal data used;
* Apply checks to determine the length of time personal data is held;
* Ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the Act;
* Take the appropriate technical and organisational security measures to safeguard personal data;
* And ensure that personal data is not transferred abroad without suitable safeguards.
* Delete all details of individuals when they cease to be members of ACP.

The Directors of ACP will appoint a Data Protection Officer who:

* Will assist the Directors to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and the supervisory authority.
* Must be independent, an expert in data protection, adequately resourced, and report to the highest management level.
* Can be an existing employee or externally appointed.
* Look after several other organisations.
* Can help the Directors demonstrate compliance and are part of the enhanced focus on accountability.

# Designated Data Controllers

The Directors of Aylsham Community Partnership are responsible for ensuring compliance with the GDPR and implementation of this policy on behalf of the Partnership. The contact details for the Directors are available from the Heritage Centre Learning Officer.

# Status of the policy

This policy has been approved by the ACP Directors and any breach will be taken seriously.

Any person, including volunteers, who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with a Director of ACP.

# Subject access

All individuals who are the subject of personal data held by ACP are entitled to:

* Ask what information ACP holds about them and why.
* Ask how to gain access to it.
* Be informed how to keep it up to date.
* Be informed what ACP is doing to comply with its obligations under GDPR.

**Rights of Individuals**

GDPR includes the right to have inaccurate data corrected (rectification) and to have data erased (to be forgotten).

**Privacy Notices**

The GDPR requires that information relating to how you are processing individuals’ data must be provided to individuals at the time of collection of the personal data. The notice must be concise, transparent, intelligible and easily accessible and be free of charge. Where data is processed and held in relation to children, the GDPR requires that privacy notices are written in a clear, plain way that a child can understand. Even though in most cases the data about children you will be processing will be provided by their parents, it is a good idea to ensure your notices meet that requirement.

# Data security

ACP Directors and staff will ensure that data is kept securely meaning that precautions will be taken against physical loss or damage, and that both access and disclosure are restricted.

# Use of data

Data collected by ACP may be used for administrative purposes including, but is principally to enable effective communication.

**Approved** by Aylsham Community Partnership Directors meeting on 5 November 2019.

Chair:

Signature:

Next review date: December 2020