



Nidderdale Plus Partnership Company No 5331403; Registered Charity No 1163998

DATA PROTECTION POLICY

Last updated: 18 November 2020

Definitions

GDPR means the General Data Protection Regulation

Responsible person means Helen Flynn

Register of systems means a register or contexts in which personal data is processed by Nidd Plus

The Board and staff of the Nidderdale Plus Partnership are committed to ensuring compliance with the General Data Protection Regulation 2018 (GDPR) which aims to promote high standards in the handling of personal information and so protect the individual's right to privacy and are registered with the Information Commissioner. This policy reflects all personal information of living people held by Nidd Plus in an electronic format and, in some cases, on paper, for example name, address, date of birth, opinions about the individual or any other information from which the individual can be identified. The policy will also recognize the importance of gaining consent when obtaining and processing personal information.

1. Data protection principles

Nidderdale Plus is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 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;
- 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; and
 - 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.

2. General provisions

- a. This policy applies to all personal data processed by Nidderdale Plus.
- b. The Responsible Person shall take responsibility for Nidderdale Plus's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. Nidderdale Plus shall register with the Information Commissioner's Office (ICO) as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Nidderdale Plus shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. A Data Privacy Notice has been written and is displayed on the Nidderdale Plus website and a physical copy is also be displayed in the front office. All staff, volunteers and customers both current and future will be provided with a copy upon request.
- d. Nidderdale Plus is aware that individuals have a right under the General Data Protection Regulation 2018 to get a copy of the information we hold about them online and in some manual filing systems. This is known as right of subject access. Nidderdale Plus will respond promptly to any such request, within 40 working days, and may charge a fee of £10 for responding to the request.

4. Lawful purposes

- a. All data processed by Nidderdale Plus must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Nidderdale Plus shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Nidderdale Plus's systems.

5. Data minimisation

- a. Nidderdale Plus shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. Nidderdale Plus shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Nidderdale Plus shall put in place an archiving policy for each area in which personal data is processed and review this process annually. The responsible person shall determine the archiving policy for each area, and be in charge of communicating this to each member of staff who is handling personal data
- b. The archiving policy shall consider what data should/must be retained, for how long, and why. The archiving policy needs to be added to each database area, so that members of staff who are using the databases daily are sure about when they can delete or archive personal data that is no longer needed.

8. Security

- a. Nidderdale Plus uses the Microsoft cloud data storage system, incorporating SharePoint and OneDrive, and shall ensure that personal data is stored securely on the Microsoft system and is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. Access to areas where personal data is stored is restricted to members of paid staff who each are assigned a personal log in. No sharing of personal data is allowed with trustees, unless there is a legitimate reason for sharing specific personal data, eg recruitment purposes. Volunteers offering their time to carry out services for Nidderdale Plus, will have access to personal data only at the time of carrying out the specific tasks they are performing, for example, the volunteer drivers are given the names and addresses of the passengers who need community transport. The Register of Systems describes in more detail the processes for sharing information with volunteers when it is needed.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Nidderdale Plus shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

This policy will be monitored and reviewed by the trustees on an annual basis. A copy is available on our website in our office and to our partner organisations, as required.

Signed.....Paula Newson Smith.....Chair, Board of Trustees

Date.....18 November 2020.....

END OF POLICY

