

Data Protection & Information Sharing Policy

Definitions

GDPR	Means the General Data Protection Regulation.
Responsible Persons	The Director and Head of Services are the responsible persons responsible for data protection matters within the organisation and responsibly for ensuring that staff that have access to information process it in accordance with this policy.
Lead Trustee	Sara Wilkie (board member) is the lead trustee for data protection within the Highbury Roundhouse .
Information Asset Register - IAR	Means Information Asset Register, a register of all systems or contexts in which personal data is processed by the Highbury Roundhouse.

1. Policy Statement

The Highbury Roundhouse is committed to processing data in accordance with its responsibilities under the GDPR. Highbury Roundhouse collects and uses information about people with whom it communicates. This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material in line with GDPR.

Highbury Roundhouse regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its operations, and to maintain confidence between those with whom it deals.

2. Purpose

The purpose of this policy is to ensure that staff, volunteers, service users and trustees of Highbury Roundhouse are clear about the purpose and principles of Data Protection under GDPR and to ensure that the organisation has guidelines and procedures in place which are consistently followed. This policy applies to.

- a. All personal data processed by the Highbury Roundhouse.
- b. The Responsible Persons shall take responsibility for the Highbury Roundhouse’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least every 2 years.

Failure to adhere to the GDPR is unlawful and could result in legal action being taken against the organisation or its staff, volunteers or trustees.

3. Principles

The GDPR regulates the processing of information relating to living and identifiable individuals (data subjects). This includes obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

To do this Highbury Roundhouse adheres to the following GDPR principles.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to data subjects;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those 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 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.

The principles apply to “personal data” which is information held on computer or in manual filing systems from which they are identifiable. Highbury Roundhouse employees, volunteers and trustees who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

4. Procedures

The following procedures have been developed in order to ensure that the organisation meets its responsibilities in terms of Data Protection. For the purposes of these procedures data collected, stored and used by Highbury Roundhouse falls into 2 broad categories:

- Highbury Roundhouse’s internal data records; Staff, volunteers and trustees
- Highbury Roundhouse’s external data records; Members, service users, supporters and other organisations

5. Lawful, fair and transparent processing:

- To ensure its processing of data is lawful, fair and transparent, the Highbury Roundhouse shall maintain a Register of Systems.
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to the Highbury Roundhouse shall be dealt with in a timely manner.

6. Purposes

Highbury Roundhouse obtains personal data (names, addresses, phone numbers, email addresses), application forms, and references and in some cases other documents from staff, volunteers and trustees. This data is stored and processed for the following purposes:

- Recruitment
- Equal Opportunities monitoring
- Volunteering opportunities
- To distribute relevant organisational material e.g. meeting papers
- Used to help identify services to users
- Safeguarding individuals

- Payroll
- Gathering data for fundraising

7. Lawful purposes

- All data processed by the Highbury Roundhouse must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- The Highbury Roundhouse shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- 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 the Highbury Roundhouse's systems.

8. Access

The contact details of staff, volunteers and trustees will only be made available to other staff, volunteers and trustees. Any other information supplied on application will be kept in a secure filing cabinet and will not normally be accessed during the day to day running of the organisation's work at different locations.

Contact details of staff, volunteers and trustees will not be passed on to anyone outside the organisation without their explicit consent.

A copy of relevant staff and volunteer emergency contact details will be kept at each location for Health and Safety purposes to be used in emergency situations e.g. fire/ bomb evacuations.

Staff, volunteers and trustees will be supplied with a copy of their personal data held by the organisation if a request is made.

9. Security summary:

- The Highbury Roundhouse shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- 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.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

10. Accuracy

The Highbury Roundhouse shall take reasonable steps to ensure personal data is accurate. Personal data will be stored for employees, volunteers or trustees at secured locations and will be stored for up to 6 years, but may be stored for longer. Unless the organisation is specifically asked by an individual to destroy their details it will normally be kept on file for future reference. The head office has responsibility for destroying personnel files. 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.

11. Storage

Personal data is kept in paper-based systems and on a password-protected computer system. Every effort is made to ensure that paper-based data are stored in organised and secure systems.

The Highbury Roundhouse will ensure that personal data is kept for no longer than necessary and will on a regular basis review records and arrange to destroy personal data that is no longer required. Where appropriate the personal data will be archived and maintained in accordance with the need for the information.

12. Use of Photographs

Where practicable, Highbury Roundhouse will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisations website or in our Newsletter.

13. Criminal Records Bureau

Highbury Roundhouse will act in accordance with the DBS code of practice.

Copies of disclosures are kept for no longer than is required. In most cases this is no longer than 6 months in accordance with the DBS Code of Practice. There may be circumstance where it is deemed appropriate to exceed this limit e.g. in the case of disputes.

14. Compliance

Compliance with the GDPR Act is the responsibility of all staff, paid or unpaid. Highbury Roundhouse will regard any unlawful breach of any provision of the Act by any staff, paid or unpaid, as a serious matter which will result in disciplinary action. Any employee who breaches this policy will be dealt with under the disciplinary procedure which may result in dismissal for gross misconduct. Any such breach could also lead to criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy should in the first instance be referred to the Responsible Persons.

15. Subject access requests and individual rights

Anyone whose personal information we process has the following rights:

- Right to be informed;
- Right of access;
- Right of rectification;
- Right to erasure;
- Right to restrict processing;
- Right to data portability;
- Right to object;
- Right not to be subject to automated decision making including profiling

Any person wishing to exercise the right of access should apply in writing to the Administrator at the Highbury Roundhouse.

The following information will be required before access is granted:

- Full name and contact details of the person making the request
- Their relationship with the organisation

We may also require proof of identity before access is granted.

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within a month of receiving the written request. Information will be presented in clear and plain language, in an intelligible and accessible form.

16. Retention of Data

No documents will be stored for longer than is necessary.

All documents containing personal data will be disposed of securely in accordance with the GDPR principles.

17. Sharing of Information

Highbury Roundhouse will occasionally share information on a data subject in order to help safeguard the individual or assist the organisation in delivering its services. We will also obtain consent before releasing the information the exceptions are as follows:

- There is a legal duty to disclose the information.
- Child and vulnerable adult abuse will be reported to Social Services.
- Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.
- If we believe an illegal act has taken place or that a user is at risk of harm, we will report this to the appropriate authorities.

18. Privacy notice

The Highbury Roundhouse needs to keep certain information on its employees, volunteers, donors, suppliers and service users to carry out its day to day operations, to meet its objectives and to comply with legal obligations. The organisation is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulation (GDPR). For more details please see our Privacy Policy.

19. 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, the Highbury Roundhouse shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the Information Commissioner’s Office (more information on the ICO website).

This policy was adopted by: Highbury Roundhouse	Date: 17th February 2023
To be reviewed February 2025	