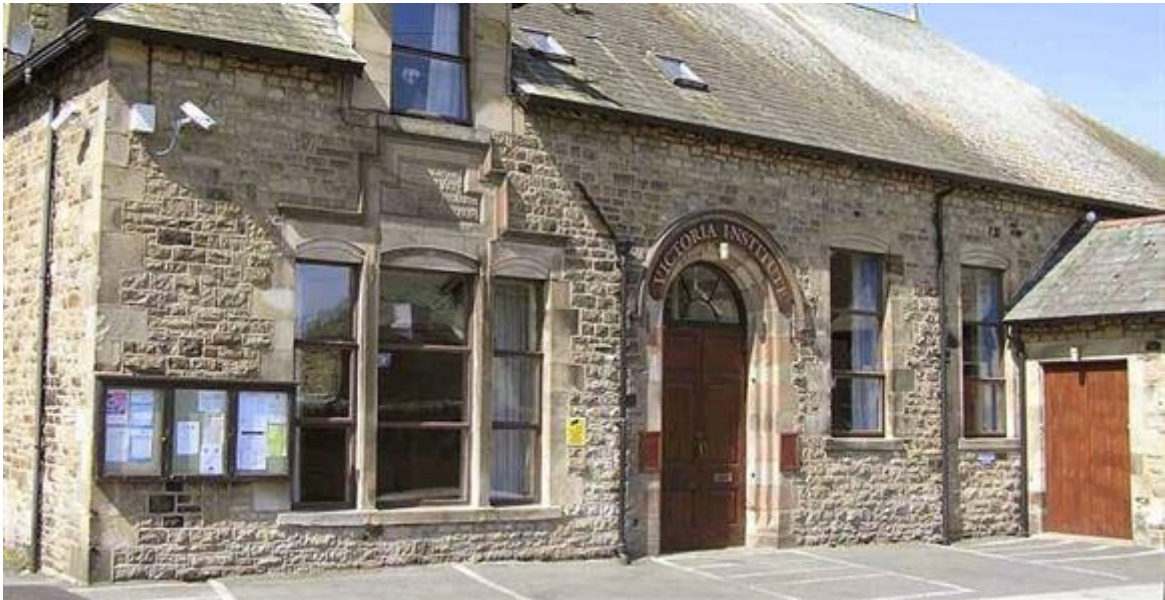


# THE VICTORIA INSTITUTE

Registered Charity Number: 521068



## POLICY STATEMENT ON DATA PROTECTION

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# 1 Declaration of Intent

The Victoria Institute is a Data Controller under the Data Protection Act and is legally responsible for complying with the Act and, in particular, the General Data Protection Regulation (GDPR) that came into force on 25<sup>th</sup> May 2018. It is committed to a policy of protecting the rights and privacy of individuals but needs to collect and use certain types of Data in order to carry on its work of providing a centre supplying facilities that can be hired by members of the local community.

The purpose of this policy document is to set out the Victoria Institute's commitment and procedures for protecting the personal data of its Hirers and employee. The Trustees regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of its Hirers and employee. They recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

## 2 Data to be held and where

No Special Category Data (for example ethnic origin, sexual orientation) will be held by the Victoria Institute for any of its users, hirers or its employees, except for the Accident Log:

- the Accident Log maintains data as required under Health & Safety Law. It must be maintained for 3 years and it will then be removed as part of a housekeeping activity. Once submitted, such records will be stored in locked private office and used only as required for Health & Safety activity. Authorisation to retain data is not required because the data is held in order to comply with legal requirements.

### 2.1 Hirer Personal Data

The Victoria Institute needs to be able to contact its Hirers and invoice them for facilities they use. It therefore will collect the following data from each Hirer:

- Name of the person (or person representing a club or activity) to whom an invoice is to be sent
- Address of the above person
- Telephone number of the above person
- Email, if appropriate, of the above person
- Name of club or activity if relevant.

The above data is held:

1. On Application for Hire paper forms
2. On a computer in the Victoria Institute
3. On the computer of the Treasurer
4. On a memory stick for backup purposes.

### 2.2 Employee Personal Data

The following data is held for an employee:

- Title
- Name

- Address of the above person
- Telephone number of the above person
- Email, if appropriate, of the above person
- Date of birth
- NI Number
- Tax Code
- Pay details
- Pension payments.

The above data is held:

1. On a computer in the Victoria Institute
2. On a memory stick for backup purposes
3. Paper record of details and payslips.

### **2.3 Business Contacts Data**

Business contact details (suppliers, maintenance etc) will be held in paper form in a locked office or on a password protected computer.

### **2.4 Trustee Contact Data**

Trustees contact details will be held to enable communication between themselves in discharge of their duties.

- Name of the person
- Address of the above person
- Telephone number of the above person
- Email, if appropriate, of the above person.

Trustees contact details will be shared with the Charity Commission in accordance with Government regulations.

## **3 Retention Period**

Records pertaining to accounting records and employment should be kept for 3 years after the end of the financial year and then disposed. Any other personal data should be removed after 12 months.

## **4 Procedures**

### **4.1 Transparency**

#### **4.1.1 Hirers**

The Victoria Institute will inform its Hirers that it is collecting their data:

- In order to be able to contact them
- In order to be able to invoice them.

Data will not be shared with other organisations or people.

### **4.1.2 Employee**

The Victoria Institute will inform its employee that it is collecting his/her data:

- In order to be able to contact him/her
- In order to be able to add him/her to the payroll and pension contributions programs
- In order to comply with employment regulations and best practice

and for no other purpose.

## **4.2 Accuracy**

The Victoria Institute will allow any employee or Hirer providing a document that identifies him/her:

- To view the data it holds for him/her
- To allow a him/her to specify corrections to errors in the data held
- To correct incorrect data within 30 days of being informed of the error.

## **4.3 Data Transfer**

### **4.3.1 General**

Other than specified in sections 4.3.2 and 4.3.3, data will not be transferred elsewhere including to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

### **4.3.2 Hirer Personal Data**

Hirer personal data is transferred from the computer in the Victoria Institute, see section 2, in two instances only:

- On a regular basis to a backup medium for security purposes to ensure continuity of service should the computer on which it resides become defective
- Periodically to the Treasurer's computer for invoicing backup purposes.

### **4.3.3 Employee Personal Data**

Employee personal data is transferred from the computer in the Victoria Institute, see section 2, in three instances only:

- On a regular basis to a backup medium for security purposes to ensure continuity of service should the computer on which it resides become defective
- To HMRC for tax purposes
- To NEST for pension purposes.

## **4.4 Security**

No sensitive data is held for any of the Victoria Institute's Hirers or its employee (see section 2). This means that explicit consent forms and the handling of them will be unnecessary.

The Victoria Institute will ensure that no unauthorised access to or disclosure of its employee's or Hirers' personal data is possible.

#### **4.4.1 Electronic Data**

##### **4.4.1.1 Hirer Personal Data**

Electronic data will be held on two computers: the main computer in the Victoria Institute and a copy on the Treasurer's computer. Access to these is via encrypted passwords.

##### **4.4.1.2 Employee Personal Data**

Electronic data will be held on a computer in a locked office in the Victoria Institute. Access to this computer is via an encrypted password.

#### **4.4.2 Passwords**

- Passwords will be set that are not easy to guess
- Passwords will be changed 6-monthly or when staff / trustees with access to data leave their post
- Passwords will be a minimum of 8 characters in length
- Passwords will be written down but held in a locked safe to allow access to the computer in exceptional cases (e.g. unexpected loss of staff)
- The computers that hold personal data will be locked when left unattended.

#### **4.4.3 Back-ups of Data**

Backups of data will be placed in a fireproof safe in a locked office. Backups should be made weekly to a memory stick and/or on each significant update of electronic data. More than one memory stick should be used in cyclic fashion to use the oldest copy as the next live copy. A copy of the data should be held off-site as a precaution against fire or flood damage on-site. Data should be encrypted if not held in secure storage and not in active use.

#### **4.4.4 Paper Based Data**

Such as Application for Hire Forms, current and historical employee information etc will be held in a locked cabinet in the lockable office in the Victoria Institute. It will be acceptable to protect such records by locking the office during normal opening times if the records are in use for reference or update.

#### **4.4.5 End of Life**

##### **4.4.5.1 Paper Records**

Paper records will be shredded at end of life.

##### **4.4.5.2 Electronic Data**

Memory sticks and hard drives containing personal data will be physically destroyed at end of life by smashing them with a hammer.

## **5 Other Considerations**

### **5.1 Email**

The Victoria Institute will consider whether an email (both incoming and outgoing) will need to be kept as an official record. If an email needs to be retained it will be saved into an appropriate folder on a password protected computer or printed and stored securely.

Emails that contain personal information no longer required for operational use will be deleted from the mailbox in which it is stored and any “deleted items” box.

## 5.2 Phone Calls

Phone calls can lead to unauthorised use or disclosure of personal information and the following precautions will be taken:

- Personal information will not be given out over the telephone unless there is no doubt as to the caller’s identity and the information requested is innocuous
- If there is any doubt, the caller will be asked to put his/her enquiry in writing
- If a phone call asking for personal information is received the receiver will take into account that the call may be coming from an impersonator.

## 5.3 Portable Devices

This refers to laptops and portable devices, such as memory sticks used for backups, holding personal data.

- Will be password protected where possible
- Will be kept out of site when travelling in a car
- Will not be left in a car overnight
- Will not be left unattended in a public place
- Will be kept close at all times when travelling on public transport.

# 6 Responsibilities

## 6.1 The Victoria Institute

The Victoria Institute will be responsible for ensuring the policy is implemented:

- Monitoring that the data is collected and used fairly
- Ensuring that no data other than that specified in section 2 is collected
- Ensuring the quality of the data collected
- Ensuring the rights of the Hirers and employee including
  - The right to be informed that processing is undertaken
  - The right to access personal information
  - The right to prevent processing in certain circumstances
  - The right to correct, rectify, block or erase data which is regarded as wrong
- Taking appropriate technical and organisational security measures to safeguard personal data
- Ensuring that personal data is not transferred abroad without suitable safeguards
- Treating Hirers justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for data
- Setting out clear procedures for responding to requests for data
- Reviewing and auditing the ways the Victoria Institute holds, manages and uses the personal data it has collected.

It will appoint a Data Protection Officer who will have overall responsibility for:

- Ensuring everyone processing personal data understands that they are contractually responsible for following good data protection practice
- Ensuring everyone processing personal data is appropriately trained to do so
- Ensuring those wanting to make enquiries about handling personal data know what to do
- Dealing promptly and courteously with any enquiries about handling personal data
- Describing clearly how the Victoria Institute handles personal information
- Reviewing regularly the ways the Victoria Institute holds, manages and uses personal data
- Assessing and evaluating its methods and performance in relation to handling personal data.

### 6.2 The Hirer

A Hirer will be responsible for:

1. Providing accurate data when applying to hire the facilities of the Victoria Institute
2. Informing the Victoria Institute of any changes that may arise in that data.

### 6.3 The Employee

The employee will be responsible for:

3. Providing accurate data on taking up employment with the Victoria Institute
4. Informing the Victoria Institute of any changes that may arise in that data.

## 7 Data Protection Officer

The Data Protection Officer for the Victoria Institute is:

Name:

Contact Details:	



# THE VICTORIA INSTITUTE

Registered Charity Number: 521068

**Funders:**

Big Lottery

Awards for all

Post code lottery

Cottam trust

Thrive Renewables

Flood relief fund

The Co-operative Group Ltd

Asda

Station Hotel, Caton

**Trustees:**

Please see our website:

<http://www.victoria-institute.org.uk/contact>