



# Norfolk Green Care Network

## Data Protection Policy

(approved by the Network Annual Meeting on 20<sup>th</sup> October 2021)

### 1) Definitions

1. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.
2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

### 2) Responsibility

1. Overall and final responsibility for data protection lies with the Convenor, who is responsible for overseeing activities and ensuring this policy is upheld.
2. All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

### 3) Overall policy statement

1. Norfolk Greencare Network needs to keep personal data about its groups and committees, members and supporters in order to carry out group activities.
2. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
3. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
4. We will only collect, store and use data for:
  - o purposes for which the individual has given explicit consent, or
  - o purposes that are in our our group's legitimate interests, or
  - o contracts with the individual whose data it is, or
  - o to comply with legal obligations, or
  - o to protect someone's life, or
  - o to perform public tasks.
5. We will provide individuals with details of the data we have about them when requested by the relevant individual.
6. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
7. We will endeavour to keep personal data up-to-date and accurate.
8. We will store personal data securely.
9. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
10. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
11. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which

may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

12. To uphold this policy, we will maintain a set of data protection procedures for our groups, committees, members and volunteers to follow.

#### **4) Review**

**This policy will be reviewed every two years**

**Date October 20<sup>th</sup> 2021..... Date for next review: October 2023**

## **Data protection procedures**

### **1) Introduction**

1. Norfolk Green Care Network has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

### **2) General procedures**

1. Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with the GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet held by the convenor/deputy convenor.
2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
3. We will keep records of consent given for us to collect, use and store data. These records will be stored securely.
4. In the event of an alleged data protection breach, the convenor / deputy convenor and the person to whom the data belongs will be informed as soon as possible. Steps will be taken to identify what has happened and retrieve any lost data. If needed, steps will be taken to prevent a recurrence (This might include a policy / procedure review, further training etc depending on the situation).

### **3) Mailing list**

1. We will maintain a mailing list. This will include the names and contact details of people who wish to receive information and networking opportunities from Norfolk Green Care Network.
2. When people sign up to the list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give separate consent to receive commercial marketing or publicity and fundraising messages, and will only send them messages which they have expressly consented to receive.
3. We will not use the mailing list in any way that the individuals on it have not explicitly consented to.
4. We will provide information about how to be removed from the list with every mailing.
5. We will use mailing list providers who store data within the EU.

## 6) Contacting members

1. People engage with Norfolk Greencare Network in different ways.
2. We will maintain a list of contact details of our members (both Full and Associate) We will share relevant information from the Green Care sector, opportunities and requests for help with people on this list.
3. People will be removed from the list if they request it by electronic means/ email or letter to the Network Convenor.
4. When contacting people on this list, we will provide a privacy notice which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.
5. Members (either voting or associates) who have requested to be included on a special member's register with the purpose of sharing expertise, information, requests or offers of help and collaboration will be given a password to access this register on the understanding that they do not share this with anyone not on this special register. They may remove themselves from this special register at any time. In adding their contact details to this special register Members accept that their contact details are being shared with others on this register, but again on the understanding that they do not share other members details without gaining prior consent.

## 7) Contacting Group and Committee members

The Network's groups and committees need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met:

1. Group and Committee contact details will be shared among the relevant group or committee.
2. Group and Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than Norfolk Green Care Network business, without explicit prior consent.

## 8) Review

These procedures will be reviewed every two years

Date.....

Signature (Convenor).....

Signature (Deputy Convenor).....

**Page updated October 2021    Review Date October 2023**

Policy modelled on sample policy from: [www.resourcecentre.org.uk/information/data-protection-for-community-groups/](http://www.resourcecentre.org.uk/information/data-protection-for-community-groups/)

For more information on GDPR see Information Commissioner's Office (ICO) [Guide to the UK General Data Protection Regulation \(UK GDPR\) | ICO](#)

Online training tutorial [Free GDPR Tutorial - Implementing GDPR | Udemy](#)