

The Barnes Literary Society Data Protection Policy

Purpose

The purpose of this policy is to identify practice that will ensure that The Barnes Literary Society [BLS] can process data within its responsibilities under General Data Protection Regulation Legislation [GDPR May 2018]

Scope

It is the responsibility of the Chair of the BLS Committee to ensure that all BLS Committee members comply with practice described within this policy, hence within the requirements of GDPR.

Data Protection Principles as defined under Article 5 of the GPDR

Personal data must be:

- processed lawfully, fairly and in a transparent manner in relation to individuals
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and 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
- 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
- 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

Policy statement, provision and safeguards

General provisions of the policy

- This policy applies to all personal data processed by BLS
- BLS' 'responsible person' will take responsibility for BLS' ongoing compliance with this policy
- The policy will be reviewed tri-annually
- Individuals have the right to access their personal data – any requests made will be responded to promptly

Lawful purpose

- All data processing carried out by BLS must be done within one of the following lawful categories: consent, contract, legal obligation, vital interests, public task or legitimate interests

- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent will 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 will be clearly available and systems will be in place to ensure that such revocation is reflected accurately in BLS' systems

Data minimisation

- BLS will ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

Accuracy

- BLS will take reasonable steps to ensure that personal data are accurate
- Where necessary for the lawful basis on which data is processed, steps will be put in place to ensure that personal data are kept up to date

Removal

- To ensure that personal data are kept for no longer than necessary, BLS will ensure that personal data are removed two years after members leave the Society

Security

- BLS will ensure that personal data are stored securely using modern software that is 'fit for purpose'
- Access to personal data will be limited to Committee members who need access and appropriate security will be in place to avoid unauthorised sharing of information
- When personal data are deleted this will be done in a manner that means that the data are unrecoverable
- Appropriate contingency [back-up and disaster recovery] plans will be in place

Legislation and Guidance that informs this policy

- General Data Protection Regulation [GDPR May 2018]
- Freedom of Information Act [2000]