

Charity Number: 1156427

Somerford ARC Community Centre

# Data Protection Policy

Created: June 2022



## **General Statement of Policy**

Somerford ARC Community Centre is committed to safeguarding personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines how we collect, use, store and protect personal data, respecting the rights of trustees, employees, volunteers, service users and external organisations and services.

### **1. Introduction**

- 1.1. Somerford ARC Community Centre is committed to handling personal data lawfully, ethically, and transparently.
- 1.2. Personal data is processed only for the purposes essential to the Charity's mission and operations, including:
  - Maintaining accurate records of service users, members and hirers.
  - Supporting adults at risk through appropriate personal emergency evacuation plans.
  - Holding emergency contact information for vulnerable members.
  - Maintaining personal data for those requiring transport to access our services.
  - Managing employees and volunteers efficiently.
  - Ensuring transparency in financial and organisational records.
  - Enhancing the security of the centre and its premises.
  - Responding to enquiries, concerns and complaints efficiently.
- 1.3. This policy applies to trustees, employees, service users, and external organisations and services interacting with our organisation.
- 1.4. Non-compliance may result in disciplinary action, contract termination, or other appropriate measures.
- 1.5. Data protection is embedded in all organisational processes, ensuring ongoing compliance with data protection regulations.
- 1.6. Somerford ARC Community Centre is accountable for processing personal data and ensures compliance with data protection laws.

### **2. Legislation**

- 2.1. This policy aligns with the following regulatory and best practice guidelines upholding the rights and privacy of all individuals:
  - The General Data Protection Regulation (UK GDPR).
  - The Data Protection Act 2018.
  - Guidance issued by the Information Commissioner's Office (ICO)

### 3. Definitions

Term	Definition
Personal data	Information relating to an identifiable person who can be directly or indirectly identified, particularly by reference to an identifier.
Special category data	Sensitive data requiring additional safeguards. (e.g. health, religion, ethnic origin, etc)

### 4. Data Protection Principles

4.1. Somerford ARC Community Centre is dedicated to processing data in compliance with its responsibilities under article 5 of the UK GDPR, adhering to the following principles:

- **Lawfully, fairly, and transparently processed:** Data is processed lawfully, fairly, and in a transparent manner.
- **Collected for specific purposes:** data is collected for specific, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Minimised:** Only data necessary for the stated purposes is collected.
- **Accuracy:** data is kept accurate and up to date, with inaccuracies corrected or deleted promptly.
- **Storage limitation:** Data is retained only for as long as necessary for its intended purpose, unless legally required otherwise.
- **Security:** Appropriate technical and organisational measures protect data from unauthorised access, accidental loss, or damage.

### 5. Fair, lawful and transparent processing

5.1. Data is processed based on legal grounds such as consent, contractual necessity, legal obligation, vital interest, public interest, or legitimate interest.

5.2. To process data Somerford ARC Community Centre informs individuals of our data protection arrangements, including:

- Purpose and use of their data.
- Identity of the data controller.
- Data storage, retention, and security measures.
- Their rights, including how to raise a complaint.

### 6. Data controllers

6.1. Somerford ARC Community Centre is the data controller, legally responsible to ensuring lawful processing and protection of personal data in accordance with UK GDPR.

6.2. In accordance with data protection regulations, our Charity pays an annual data protection fee to the Information Commissioner Office (ICO).

## **7. Data Processor**

- 7.1. Data processing is conducted internally by employees, who adhere to organisational measures to ensure compliance and protect data subject rights. Their responsibilities include:
  - Acting only on the controllers instructions.
  - Maintaining confidentiality and security.
  - Assisting with data subject requests and compliance-related reporting.

- 7.2. Employees are regularly trained on data protection policies to ensure compliance with legal obligations and data subject protection.

## **8. Purpose Limitations and data minimisation**

- 8.1. Somerford ARC Community Centre processes data only for the lawful basis and specific purposes for which it is collected, ensuring that data is not used for any unrelated or incompatible purposes.
- 8.2. As a basis for determining if the legitimate interest is a reasonable ground for processing data the ICO balancing test is used:
  - Determining if individuals would reasonably expect their data to be used in this way.
  - Evaluating the potential nuisance or intrusion of unwanted communications.
  - Considering the impact on more vulnerable individuals based on method and frequency of contact.
- 8.3. Data collected as part of contractual agreements is retained exclusively for the purpose of evidencing the contract and fulfilling contractual agreements. It is not used for marketing or unrelated purposes.
- 8.4. Personal information is collected only to the extent necessary to fulfil the intended purpose, ensuring that the data is adequate, relevant, and limited to what is required for its processing purpose. No information is collected on a “just in case” basis.

## **9. Obtaining consent**

- 9.1. Our organisation obtains consent through clear and transparent disclosure forms that explain to individuals **APPENDIX 1**:
  - Why their information is collected.
  - How their information will be used.
  - The specific purpose for which their data will be processed.
- 9.2. Mailing lists are managed through Mailchimp, allowing users to opt-in and providing them with the option to unsubscribe at any time.
- 9.3. Consent is recorded and maintained by Somerford ARC Community Centre, including the date, time and purposes for which consent was granted.

## **10. Data retention and storage**

10.1. Somerford ARC Community Centre ensures that personal data is not retained for longer than necessary. Data retention periods are based on the type of data and the purpose for its collection:

- Personal data: Retained for no longer than 2 years after the last interaction or service provision, unless there is a legal or contractual requirement to retain it longer.
- Financial records: retained for a minimum of 6 years after the accounting period to which they relate, in accordance with legal obligations.
- Employee records: retained in line with employment law, typically for 6 years after the employment has ended, unless retention for a longer period is required for legal or regulatory purposes.

10.2. All data is securely stored:

- Physical records are kept in locked cupboards in a secure location, marked confidential where appropriate.
- Electronic data is stored on encrypted devices and protected by passwords and access controls.

10.3. Data is reviewed regularly, and data no longer required will be securely deleted or anonymised, in accordance with the retention periods outlined above.

## **11. Withdrawing consent, subject access rights and right to erase**

11.1. Somerford ARC Community Centre ensures that individuals can withdraw consent easily, using the same method by which consent was granted.

11.2. Upon receipt of a withdrawal request, we will confirm that request and explain any implications (if withdrawal will affect access to certain services). Withdrawal requests will be processed promptly, and the data subject will be informed that their consent has been successfully withdrawn.

11.3. All data subjects had the legal right to access and review any information held about them by Somerford ARC Community Centre including:

- The right to access, review and receive copies of their data.
- The right to understand how, where, and why their data is being processed.
- The right to request rectification of inaccurate or incomplete data.
- The right to request restriction of processing or deletion of their data (subject to limitations as outlined below).

11.4. Subject access requests (SARs) will be processed within one month of receipt, free of charge, upon verification of the individual's identity.

11.5. The right to erase allows individuals to request the deletion of their data, however, this right is subject to limitations in cases where:

- data retention if required for legal obligations.

- The data is being processed for public interest, historical or statistical purposes.
- The data is necessary for the establishment, exercise, or defence of legal claims.

- 11.6. Requests for access or deletion will be acknowledged and processed in line with GDPR, and the individual will be informed if the request is denied or delayed, with an explanation provided.
- 11.7. Any persons wishing to withdraw consent, access their information or requesting the right to erase can do so by the following methods:
  - By email to: [info@somerfordarc.com](mailto:info@somerfordarc.com)
  - In writing to: Somerford ARC Community Centre, 20 Southey Road, Christchurch, BH23 3EH.

## **12. Reporting breaches**

- 12.1. If employees or volunteers believe that the data protection policy is not being followed or that a data breach has occurred, they must report the issue immediately to the office manager.
- 12.2. All breaches will be thoroughly documented, investigated, and assessed to determine the severity and potential impact on data subjects. The investigation will include a review of the circumstances, the nature of the breach and any steps taken to mitigate the risk.
- 12.3. Any breach that may put an individual at potential risk of harm, identity theft, financial loss, or distress will be reported to the Information Commissioners Office (ICO) within 72 hours of detection.
- 12.4. Breaches of the Somerford ARC Community Centre Data Protection Policy may result in disciplinary action, including dismissal in the case of serious breaches. Intentional or reckless breaches or those made for personal gain, may result in legal action or regulatory penalties.

### **How to contact the ICO**

Individuals can contact the Information Commissioners Office by:

- Website: [www.ico.org.uk](http://www.ico.org.uk)
- Phone: 0303 123 1113
- Address: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Associated Policies and Procedures
Computer Use, internet and Email Guidance Policy
Confidentiality Policy
Whistleblowing Policy
Privacy Notice

Created by	
Print name	Lauren Biggs
Role	Office Manager
Date	20-06-2022

Review History	Reviewed by	Validated by
20-06-2022	Lauren Biggs	
02-10-2023	Lauren Biggs	
26-11-2024	Lauren Biggs	

Next review date	<b>26-11-2026</b>
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## APPENDIX 1





## Somerford ARC Community Centre

20 Southey Road, Christchurch, BH23 3EH  
01202 470770/ [info@somerfordarc.com](mailto:info@somerfordarc.com)

## Disclosure Form

### Consent to hold information

Under the General Data Protection Regulations (GDPR) 2018 you have a right to privacy and confidentiality. This means your information will be treated securely, and you have control over how it is shared.

As an organisation we do not collect or store information that is not relevant to the purpose for which it is being collected. This means that you have the right to control the information that is held about you and must give consent for any information collected and used.

We only store the following information:

- Your telephone number
- Emergency contact details
- Address
- Email address

Your information will not be shared with any third-party organisations without your consent, except in cases where there are serious safeguarding concerns regarding your health and safety. In such cases, we will inform you of the situation.

You have the right to access, amend, or withdraw your consent to hold and share your information at any time.

Your information will be reviewed annually, to ensure it is accurate and up-to-date. We will securely store your information for no longer than 2 years after you cease your involvement with our organisation in order to meet our legal obligations, and to make it easier for you if you come back to us in the future. After 2 years your personal information will be securely destroyed.

All information is stored in compliance with the Somerford ARC Community Centre Confidentiality Policy and Data Protection Policy. Only authorised employees and Trustees have access to your personal information to ensure that there are no unauthorised or unlawful breaches.

If there is any breach of your personal information we will inform you immediately and take the necessary actions to protect you from any potential risks.

### **This is an agreement between yourselves and Somerford ARC Community Centre:**

Registered Charity No. 1156427  
Authorised Persons: Chair: Paul Hilliard, Office Manager: Lauren Biggs  
Address: 20 Southey Road, Christchurch, BH23 3EH  
Telephone No. 01202 470770

TRUSTEES | Paul Hilliard (Chair & Treasurer), Simon McCormack (Vice Chair), Janet Abbott, Stephanie King, Christine Hopkins & David Jones  
Registered Charity No: 1156427

TRUSTEES | Paul Hilliard (Chair/Treasurer, Christine Hopkins (Vice-Chair), David Jones (Secretary) Trustees: Mandy Forbes &, Jennifer Spencer



## Somerford ARC Community Centre

20 Southey Road, Christchurch, BH23 3EH  
01202 470770/ [info@somerfordarc.com](mailto:info@somerfordarc.com)

### **Photography and moving image consent**

To meet the requirements of the Data Protection ACT 1998, we need your permission to keep and use photos, where you are the main subject.

Somerford ARC uses images for the promotion of our community centre and our projects in printed material such as leaflets, brochures and reports. Sometimes allowing certain carefully selected and related organisations, to use some of this material to promote our work in the community.

We also use still/moving images to promote our centre and projects for online publications on our website and social media pages of Somerford ARC Community Centre.

If you **do not** wish your photographs and moving images to be used, please tick here

If you **do** consent, please continue below:

#### **How I consent my photographs and moving images to be used:**

Somerford ARC Community Centres internal and external presentations  
Somerford ARC Community Centres website  
Somerford ARCs social media pages, content may be shared by others  
National, regional, local papers and news sites

  
  

#### **Please sign below**

Name of person completing this form	
Signature	
Date	

**Data protection:** The information that you provide here will only be used to contact you about sharing your story/ information in our communications work. We will not pass the details recorded on this form to any other Organisation without your permission. We will not store your data for any longer than two years.

TRUSTEES | Paul Hilliard (Chair & Treasurer), Simon McCormack (Vice Chair), Janet Abbott, Stephanie King, Christine Hopkins & David Jones  
Registered Charity No: 1156427

\*Disclosure forms may vary dependant on what information held.