

Kirkhill Community Centre

Data protection policy

As approved by Trustee Board on 2/11/15

1. Kirkhill Community Centre (KCC) SCIO holds three types of information which are covered by this policy:
 - **organisational** information – publicly available information about organisations and some confidential information
 - **personal** information – information about individuals such as names and addresses
 - **sensitive** personal information – in general this kind of information is only likely to be held about employees. There are, however, instances where sensitive information is held about other people. For example information about requirements for a hall booking might allow a person's religion to be deduced.

Information about organisations is not covered by the Data Protection Act. However there is sometimes ambiguity about whether certain information is personal or organisational. For instance the contact details for many user organisations will be someone's home address. Also KCC should strive for best practice as regards organisational information. For these reasons organisational information is covered by this policy.

The organisations and people about which KCC holds information are referred to in this policy as data subjects

2. KCC will not hold information about individuals without their knowledge and consent.
3. KCC will only hold information for specific purposes. It will inform data subjects what those purposes are. It will also inform them if those purposes change. The only exception to this is that KCC will make it clear to members that it is a condition of their membership that KCC will decide what should happen to information supplied about the organisation (but not about individuals within the organisation, other than postholder names).
4. Information will not be retained once it is no longer required for its stated purpose.
5. KCC will seek to maintain accurate information by creating ways in which data subjects can update the information held.
6. Data subjects will be given the option not to receive marketing mailings from KCC or other organisations (but see 3 above).

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7. Data subjects will be entitled to have access to information held about them by KCC.
8. Information about data subjects will not be disclosed to other organisations or to individuals who are not members of KCC staff or Trustee Board except in circumstances where this is a legal requirement, where there is explicit or implied consent or where the information is publicly available elsewhere.
9. KCC has procedures for ensuring the security of all personal data. Paper records containing confidential personnel data are disposed of in a secure way.
10. KCC has a set of procedures covering all areas of its work which it follows to ensure that it achieves the aims set out above.
11. The Secretary has been designated as the Data Protection Compliance Officer for KCC.
12. At the beginning of any new project or type of activity the member of staff or volunteer or Trustee Board member managing it will consult the Secretary about any data protection implications.
13. All new staff and Trustee Board members will be given information on the data protection policy and procedures.
14. KCC will carry out an annual review of its data protection policy and procedures.

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Data Protection Procedures

This procedure enhances the Data Protection Policy, detailing how the policy works within Kirkhill Community Centre (KCC).

Personal data is held for the following purposes:

- Membership applications and lists
- Facilities bookings
- Communicating with members, users, volunteers, employees and trustees

KCC uses data stored on:

- Trustee home computers and devices
- KCC secure cloud storage
- www.kirkhillandbunchrew.org.uk
- Paper

KCC will manage the information in different formats in the following ways:

Digital data

- KCC will ensure the storage of personal data lists on trustee home computers and devices is phased out by providing secure, password protected cloud storage
- KCC will ensure that passwords change on change of trustee
- The Data Protection Compliance Officer will carry out a review of data held and work with data holders to facilitate the transfer and deletion of data on personal computers and devices. This will be complete by 31 December 2015

Website data

- KCC will only usually publicise KCC email and contact information. Personal contact information will only be published with prior consent of the individual
- KCC annual reports will have all signatures redacted prior to publication
- The Data Protection Compliance Officer will carry out a review of the information published on the website and amend as necessary. This will be complete by 31 December 2015

Paper data

- KCC membership applications will only be kept up to a year after the member has resigned after which they will be securely destroyed. Member applications should be kept in a file in a secure location within the community centre.

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- Hall user booking information including booking forms will be kept by the membership secretary in a secure location at home. Where information needs to be stored for a period of time it will be removed to a secure location within the community centre. If possible information should be scanned and stored in the KCC cloud storage.
- MUGA booking forms will be scanned and stored in the KCC cloud storage. Original forms will be securely destroyed.

Communicating with members, users and other parties

KCC will only use personal data to communicate with members, employees, users and volunteers about Kirkhill Community Centre.