

Data Protection Policy

1. Definitions

Charity means Cinderford Area Neighbourhood Development Initiative (CANDI), a registered charity.

GDPR means the General Data Protection Regulation.

Register of Systems means a register of all systems or contexts in which personal data is processed by CANDI.

2. Data protection principles

CANDI is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals.
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. accurate and, where necessary, 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.
- e. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. 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.

3. General provisions

- a. This policy applies to all personal data processed by CANDI.
- b. The Company Secretary shall take responsibility for CANDI's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. CANDI shall register with the Information Commissioner's Office as an organisation that processes personal data if required. Currently, CANDI is exempt.

4. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, CANDI shall maintain a Register of Systems.
 - i. Data is collected from trustee, employment or volunteer application forms
 - ii. Data is stored electronically on spreadsheets which are held in a secure cloud. Paper copies are stored in a locked cabinet within a locked office. The Chair of Trustees, the Treasurer and the Company Secretary have keys.
 - iii. Data is shared with trustees and the management team on a need-to-know basis
 - iv. Data is primarily used for contact purposes.
 - v. Data is removed from spreadsheets one year after a volunteer ceases involvement with CANDI.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to CANDI shall be dealt with in a timely manner.

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5. Lawful purposes

- a. All data processed by CANDI must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. CANDI shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in CANDI's systems.

6. Data minimisation

- a. CANDI shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7. Accuracy

- a. CANDI shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

8. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, CANDI shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

9. Security

- a. CANDI shall ensure that personal data is stored securely using modern software that is kept-up to date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

10. CCTV

- a. The purpose of this section is to manage and regulate the use of the surveillance and CCTV systems at our premises and ensure that we comply with the GDPR.
- b. We use CCTV at the front and rear of the premises and in the café to provide additional security. We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.
- c. Any enquiries about the CCTV system should be directed to the Company Secretary.
- d. It is important that access to, and disclosure of, the images recorded by surveillance and CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes. Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:
 - i. the police – where the images recorded would assist in a specific criminal inquiry
 - ii. prosecution agencies – such as the Crown Prosecution Service (CPS)
 - iii. relevant legal representatives – such as lawyers and barristers
 - iv. persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000

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11. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, CANDI shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

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