1. Purpose and Scope

Cinderford Area Neighbourhood Development Initiative ("CANDI") is committed to protecting the privacy and security of personal data and to complying with its legal obligations under the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018

This policy sets out how CANDI collects, uses, stores, shares, and protects personal data and applies to all trustees, employees, volunteers, contractors, and anyone else who processes personal data on behalf of CANDI.

2. Definitions

- **Charity** means Cinderford Area Neighbourhood Development Initiative (CANDI), a registered charity.
- **UK GDPR** means the United Kingdom General Data Protection Regulation, as incorporated into UK law by the Data Protection Act 2018
- **Personal Data** means any information relating to an identified or identifiable living individual.
- **Special Category Data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, or data concerning a person's sex life or sexual orientation.
- **Processing** means any operation performed on personal data, whether automated or not
- **Register of Systems** means a written record of CANDI's processing activities maintained in accordance with Article 30 UK GDPR

3. Roles and Responsibilities

- CANDI is the **Data Controller** for the personal data it processes.
- The **Company Secretary** acts as CANDI's **Data Protection Lead** and is responsible for:
  - overseeing compliance with this policy;
  - maintaining the Register of Systems;
  - managing data protection risks and breaches;
  - acting as the primary contact with the Information Commissioner's Office (ICO)
- All trustees, staff, and volunteers are responsible for complying with this policy and protecting personal data they handle.

4. Data protection principles

CANDI processes personal data in accordance with the principles set out in Article 5 UK GDPR Personal data shall be:

1. processed lawfully, fairly, and transparently;
2. collected for specified, explicit, and legitimate purposes;
3. adequate, relevant, and limited to what is necessary;
4. accurate and kept up to date;
5. retained only for as long as necessary;
6. processed securely using appropriate technical and organisational measures.

5. Lawful Bases for Processing

All processing of personal data by CANDI is carried out under at least one lawful basis set out in Article 6 UK GDPR, including:

- consent;
- performance of a contract;
- compliance with a legal obligation;
- protection of vital interests;
- performance of a task carried out in the public interest;
- legitimate interests

The applicable lawful basis for each processing activity is recorded in the Register of Systems

Where consent is relied upon: - consent will be freely given, specific, informed, and unambiguous; - records of consent will be retained; - individuals will be able to withdraw consent at any time.

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6. Transparency and Privacy Notices

CANDI provides clear and accessible privacy notices to individuals whose personal data is collected, including trustees, employees, volunteers, service users, and visitors.

Privacy notices explain: - what personal data is collected; - the purposes and lawful bases for processing; - how long data is retained; - who data is shared with; - individuals' rights under UK GDPR; - how to contact CANDI regarding data protection matters.

7. Register of Systems

CANDI maintains a Register of Systems which records:

- categories of personal data;
- categories of data subjects;
- purposes of processing;
- lawful bases relied upon;
- retention periods;
- details of third-party processors;
- security measures in place

The Register of Systems is reviewed at least annually and whenever significant changes occur.

8. Data Subject Rights

Individuals have rights under UK GDPR, including the right to:

- access their personal data;
- request rectification of inaccurate data;
- request erasure of data where applicable;
- restrict processing;
- object to processing;
- data portability, where applicable;
- not be subject to automated decision-making.

Requests may be made verbally or in writing and will be handled without undue delay and within one month, subject to verification of identity and any lawful exemptions.

9. Data Minimisation and Accuracy

CANDI ensures that personal data collected is adequate, relevant, and limited to what is necessary for its purposes.

Reasonable steps are taken to ensure personal data is accurate and, where necessary, kept up to date.

10. Retention and Disposal

CANDI retains personal data only for as long as necessary for the purposes for which it was collected, in accordance with its retention schedule.

Examples include: - volunteer and trustee records retained for a defined period after involvement ends; - CCTV footage retained for a limited period unless required for investigation or legal purposes.

Personal data is securely deleted or destroyed when no longer required.

11. Data Security

CANDI implements appropriate technical and organisational measures to protect personal data, including:

- access controls on a need-to-know basis;
- secure cloud storage and locked physical storage;
- strong passwords and, where appropriate, multi-factor authentication;
- encryption of devices where possible;
- regular software updates;
- secure back-up and disaster recovery arrangements

All trustees, staff, and volunteers are required to maintain confidentiality and receive appropriate data protection awareness training.

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12. Data Sharing and Processors

Personal data is shared internally only where necessary and externally only where lawful and appropriate.

Where third-party processors are used, CANDI ensures that: - appropriate data processing agreements are in place; - processors provide sufficient guarantees regarding data security and compliance.

CANDI does not routinely transfer personal data outside the UK Any such transfers will comply with UK GDPR requirements.

13 CCTV

CANDI operates CCTV at the front and rear of the premises and within the café for security and safety purposes.

- The lawful basis for CCTV processing is legitimate interests.
- Clear signage is displayed to inform individuals that CCTV is in operation.
- CCTV footage is retained for a maximum of 30 days unless required for investigation or legal proceedings.
- Access to footage is restricted to authorised personnel.
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CCTV images may be disclosed to third parties only where required or permitted by law, including law enforcement and individuals exercising their data protection rights.

14 Data Breaches

A personal data breach is any breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

In the event of a breach:

- it must be reported immediately to the Company Secretary;
- the risk to individuals' rights and freedoms will be assessed;
- where required, the breach will be reported to the ICO within 72 hours;
- affected individuals will be informed where there is a high risk to their rights and freedoms.

All breaches and near misses are recorded and reviewed.

15 Training and Awareness

CANDI provides appropriate data protection training and guidance to trustees, staff, and volunteers to ensure ongoing compliance with this policy.

16 Review and Governance

This policy is reviewed at least annually and approved by the Board of Trustees

Document control

Last updated	11 March 2026
Next review	13 January 2027

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