

Harpenden Learning for Leisure (HLfL) Data Protection Policy

1. Introduction

Harpenden Learning for Leisure (HLfL) has adopted the following Data Protection policy in order to comply with the Data Protection Act 2018.

In order to operate, HLfL needs to gather, store and use certain forms of information about individuals who apply to join (members) or to tutor a course or with whom HLfL has an ongoing relationship or regularly needs to contact. For members or prospective members personal information will be given on a course enrolment form which will be retained by the appropriate HLfL committee members. This form will be retained, as it constitutes, being in HLfL's legitimate interests, the lawful abasis for the retention and processing of the personal information.

This policy explains how this data will be variously collected, stored, used, retained and deleted in order to comply with GDPR regulations.

Why is this policy important?

This policy ensures that HLfL:

- protects the security of personal information held
- complies with GDPR regulations and follows good practice;
- protects from the risks of a data breach.

Who and what does this policy apply to?

This policy applies to all HLfL committee members handling data on behalf of HLfL.

It applies to all data that HLfL holds relating to individuals, including:

- name
- postal address
- telephone number
- email address
- attendance records
- payment records

2. Roles and responsibilities under the General Data Protection Regulations (GDPR)

HLfL is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for HLfL is Nick Mourant. He, together with the management committee, is responsible for the secure, fair and transparent collection, use and retention of data by HLfL. Any questions relating to this should be directed to the Data Protection Officer.

Everyone who has access to data as part of HLfL has a responsibility to ensure that they adhere to this policy.

3. Data Protection Principles

We fairly and lawfully process personal data in a transparent way

HLfL will only collect data where lawful and where it is necessary for its legitimate purposes. This includes collection and use of data as part of an individual's membership or relationship with HLfL and this is the lawful basis for processing their data.

- A name and contact details will be collected and will be used to contact an individual regarding membership, administration and other HLfL activities. Other data may also subsequently be collected in relation to HLfL activities, as detailed above.
- An individual's details may be collected at any time with their consent, in order for HLfL to communicate with them about and promote HLfL activities.

We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes

When collecting data, HLfL will provide a clear and specific privacy statement explaining to the individual why the data is required and how it will be used. HLfL will not give any personal information to a third party without the prior express written permission of the individual who has supplied it.

We ensure any data collected is relevant and not excessive

HLfL will not collect or store more data than the minimum information required for its intended purpose.

We ensure data is accurate and up-to-date

HLfL will ask members and other individuals to inform the Data Protection Officer or the Secretary of any change in their details; these will then be amended as soon as possible and usually within one month.

We ensure data is not kept longer than necessary

HLfL will keep data for no longer than is necessary in order to meet the intended use for which they were gathered (unless there is a legal requirement to keep records).

The storage and intended use of data will be reviewed in line with HLfL's data retention provisions. When the intended use is no longer applicable (eg. contact details for a member who has left HLfL) the data will be deleted within a reasonable period.

We keep personal data secure

HLfL will ensure, as far as is reasonably and practically possible, that data held by HLfL is kept secure.

- Digitally-held data will be held within a password-protected and secure environment. The personal computer or electronic device used will also be protected by up to date security information, wherever possible. The holder will be a member of the HLfL committee.

- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored securely.
- Each time an individual with data access leaves the committee, their access to any electronic data files will be terminated, and they will be asked to confirm that they have deleted any electronic data and shredded any paper copies held by them.
- Access to data will only be given to relevant committee members where it is clearly necessary for the running of HLfL. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data.

4. Individual Rights

When HLfL collects, holds and uses an individual's personal data that individual has the following rights over that data. HLfL will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights:

- **Right to be informed:** whenever HLfL collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- **Right of access:** individuals can request to see the data HLfL holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
- **Right to rectification:** individuals can request that their data be updated where it is inaccurate or incomplete. HLfL will request that individuals check and update their data on an annual basis. Any requests for data to be updated will be processed will be carried out as quickly as possible, and usually within one month.
- **Right to object:** individuals can object to their data being used for a particular purpose. HLfL will always provide a way for an individual to withdraw consent in all marketing or information communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests.
- **Right to erasure:** individuals can request that all data held on them be deleted. HLfL's data retention provisions ensure data is not held for longer than is reasonably necessary in relation to the purpose for which they were originally collected. If a request for deletion is made we will comply with the request unless:
 - i) There is a lawful reason to keep and use the data for legitimate interests.
 - ii) There is a legal requirement to keep the data.
- **Right to restrict processing:** individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (eg. if they have contested the accuracy of any of their data, HLfL will restrict the data while it is verified).

5. Sharing of Data

HLfL will only share an individual's data with others with the individual's prior written consent.

6. How We Get Consent

HLfL will collect data from individuals in relation to its purposes as stated in its Constitution. This includes contacting them to promote courses, updating them about HLfL news, and other HLfL activities. Whenever data is collected for this purpose, the following will be provided:

- a method for individuals to show their positive and active consent to receive these communications (e.g. a 'tick box');
- a clear and specific explanation of what the data will be used for (eg. 'Tick this box if you would like HLfL to send you email updates with details about our forthcoming courses and events).

Data collected will only ever be used in the way described and where consent has been given.

Every communication will contain a method through which a recipient can withdraw their consent. Opt-out requests such as this will be processed as quickly as possible and usually within one month.

7. Data Retention

Upon request by an individual whose data is being held, HLfL will make all reasonable and practical efforts to remove personal data from its database as soon as possible and usually within one month.

Physical data will be destroyed safely and securely, including by shredding.

When a course member leaves HLfL and all administrative tasks relating to their membership has been completed any data held on them will be deleted.

Should a course member not respond to any contact for two years, HLfL may at its discretion delete the personal information held by it.

Where another individual stops working with HLfL (e.g. a course tutor or room provider) and all administrative tasks relating to their connection to HLfL have been completed, all sensitive data held on them will be deleted (e.g. bank details).

Where deleting the data would mean deleting other data that HLfL has a valid lawful reason to keep, (e.g. old emails) then the data may be retained safely and securely, but not used.

8. Regular Data Review

A regular review of all data will take place to establish if HLfL still has reason to keep and use the data held at the time of the review. The review will be conducted by the Data Protection Officer with other committee members to be decided on at the time of the review.

As a general rule, a data review will be held every year.

Data to be reviewed will include data stored digitally on members and other connected individuals stored on personal devices held by committee members and physical data stored at the homes of committee members.

Criteria to be used on data review includes those set out in the table below:

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with data protection policy
Does the original reason for having the data still apply/	Continue to use	Delete or remove data
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data
Is the data accurate?	Continue to use	Ask the individual to confirm/update details
Do we have consent, express or implied to use the data?	Continue to use	Get consent

9. Policy Review

This policy shall be reviewed every year but sooner if there are any relevant changes in the law relating to data protection that would affect the terms of this policy.

- Policy prepared by:
- Approved by committee on

Next review date: