

Reading Sustainability Centre Data Protection Policy

Policy statement

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about those who sign up to receive our newsletters and/or to be members via our website (there are referred to as Data Subjects).

People that use the data in the organisation are called 'Data Users' and they are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

About this policy

The types of personal data that Reading Sustainability Centre may be required to handle include names and emails of those who

sign up to receive our newsletter and/or

to be members via our website and

those who do consultancy work for us.

In the future we will collect data on visitors to Reading Sustainability Centre such as name, address, email, age, ethnicity, how a visitor heard about Reading Sustainability Centre, what they learnt, what they liked/didn't like and what they would like to see in future if they are willing to give us this information on a form.

The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1998 (the Act) and other regulations.

This policy has been approved by The Reading Sustainability Centre Steering Group. It sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.

The Data Protection Compliance Manager is responsible for ensuring compliance with the Act and with this policy. That post is held by Dr Antony Cowling, email, readingsustainabilitycentre@gmail.com. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to him.

Data protection principles

Reading Sustainability Centre will comply with the eight enforceable principles of good practice. These provide that personal data must be:

(a) Processed fairly and lawfully.

- (b) Processed for limited purposes and in an appropriate way.
- (c) Adequate, relevant and not excessive for the purpose.
- (d) Accurate.
- (e) Not kept longer than necessary for the purpose.
- (f) Processed in line with data subjects' rights.
- (g) Secure.
- (h) Not transferred to people or organisations situated in countries without adequate protection.

Fair and lawful processing

For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out in the Act. These include, the data subject's consent to the processing, or the legitimate interest of the data controller or the party to whom the data is disclosed.

We will only process personal data in order to send newsletters, contact members or consultants and in future collect statistics on visitors to the centre or for any other purposes specifically permitted by the Act. We will notify those purposes to the data subject when we first collect the data.

Accurate data

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

Timely processing

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will erase from our systems, all data which is no longer required.

Processing in line with data subject's rights

We will process all personal data in line with data subjects' rights, in particular their right to:

- (a) Request access to any data held about them by a data controller.
- (b) Prevent the processing of their data for direct-marketing purposes.
- (c) Ask to have inaccurate data amended.
- (d) Prevent processing that is likely to cause damage or distress to themselves or anyone else.

Data security

We will process all personal data we hold in accordance with our Data Security Policy. We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

Confidentiality means that only people who are authorised to use the data can access it.

Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.

Availability means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on The Reading Sustainability Centre central computer system instead of individual PCs.

Security procedures include:

Methods of disposal. Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.

Transferring personal data to a country outside the EEA

We will not transfer any personal data we hold to a country outside the European Economic Area.

Disclosure and sharing of personal information

We may share personal data we hold with any member of our group, which means the Steering Group, the volunteer who writes the newsletter or Facebook volunteer.

We may also disclose personal data we hold to third parties if we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property, or the safety of our volunteers, customers, or others. We may also share personal data we hold with selected third parties for the purposes set out in the Schedule.

Dealing with subject access requests

Data subjects must make a formal request for information we hold about them. This must be made in writing to Dr Antony Cowling, the Data Protection Compliance Manager.

When receiving telephone or email enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:

We will check the caller's identity to make sure that information is only given to a person who is entitled to it.

We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.

Our volunteers will refer a request to Dr Antony Cowling for assistance in difficult situations. Volunteers should not be bullied into disclosing personal information.

Changes to this policy

We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or e-mail.

SCHEDULE

Type of data	Type of data subject	Type of processing	Purpose of processing	Type of recipient to whom personal data is transferred	Retention period
Name and email address	Person wanting to receive an e-newsletter or to be involved with the activities of The Reading Sustainability Centre.	Sending emails.	Sending newsletters and other communications.	Volunteer newsletter writer. Facebook volunteer.	
Name, email address, address, phone number.	Person employed by Reading Sustainability Centre for consultancy etc.	Sending emails, letters or making phone calls.	Arranging for consultancy work to be done.	Volunteer member of website team, steering group or finance group.	
Name, address, email, age, ethnicity, how a visitor heard about Reading Sustainability Centre, what they learnt, what they liked/didn't like and what they would like to see in future..	Visitor to Reading Sustainability Centre	Data analysis to see if there are any patterns in the kind of visitors to Reading Sustainability Centre. Identifying new ideas and areas for improvement.	This would help the centre to make strategies to attract existing and new visitors. Its statistics could be compared to statistics from other sustainability centres. Allowing the centre to improve and update its performance and quality.	Person responsible for administration/statistical analysis.	