|  |  |
| --- | --- |
| Name of Area Meeting  Data Controller | Hertford & Hitchin Area Meeting of the Religious Society of Friends in Great Britain  Area Meeting Trustees ([dataprotection@hhq.org.uk](mailto:dataprotection@hhq.org.uk)) |
| Constituent Local Meetings | Guilden Morden; Hertford; Hitchin; Letchworth Garden City; Stevenage; Welwyn Garden City |
| Policy creation date | \_\_\_\_\_\_\_\_\_\_\_. |
| Policy update date | \_\_\_\_\_\_\_\_\_\_\_. |
| Policy owner | Area Meeting Trustees |
| Glossary | GDPR: EU General Data Protection Regulation (<https://gdpr-info.eu/>)  DPA 2018: UK Data Protection Act 2018 (<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>)  ICO: Information Commissioner’s Office (<https://ico.org.uk/>) |
| Responsibility and governance | All volunteers at local and area meeting level who collect and/or process personal data on behalf of their local or area meeting are responsible for compliance with Data Protection legislation. They should read this policy and familiarise themselves with other relevant polices, and the procedures for processing personal data.  Area Meeting trustees are responsible for issuing guidance and advice, updating policies, and dealing with complaints, requests from data subjects, or breaches. They can be contacted at |
| Commitment of the organisation | This Area Meeting is committed to processing personal data in accordance with the GDPR and DPA 2018.  This includes abiding by the 7 data principles:  Personal data shall be:   1. processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’); 2. 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, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (‘purpose limitation’); 3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’); 4. 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 (‘accuracy’); 5. 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 in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’); 6. 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 (‘integrity and confidentiality’). 7. The controller shall be responsible for, and be able to demonstrate compliance with the above principles. |
| Personal data collected by the meeting | Members; attenders; enquirers; external room hirers; event attendees; donors (if not members/attenders); employees; contractors; volunteers. |
| Purposes for which you collect personal data | Legitimate interests (with consent); performance of contract. |
| How will you comply with the data principles | The area meeting will comply with the seven data principles of the GDPR and DPA 2018 (see above) and with the terms of its own Privacy Policy *(copy attached)*.  Consent to record, maintain and internally publish personal data is obtained from members and attenders by means of a Data Consent Form. Without a signed copy of this form an individual’s personal data will not be published in any form.  Copies of lists of members and attenders are held electronically with password protection. Printed lists are held by individual members of the area meeting to enable contact between them. Printed lists contain a statement informing members of the need for data security.  Updates to data held are achieved by contact with responsible individuals in each local meeting, and from minutes of business meetings where membership matters are reported and discussed.  Past lists are maintained by the area meeting with the same level of security as with current lists. The area meeting has a policy of providing past lists to the County Archives (Hertfordshire Archives and Local Studies) where strict rules on access to individuals’ data is maintained. |
| Breach | In the event of a data breach (accidental or unlawful sharing, theft, loss, access to personal data), we will assess the risk to the data subjects involved, inform them of the data breach and, if necessary, report the breach to the ICO. |
| Rights | We aim to uphold data subjects’ rights over their data in accordance with GDPR. More information on data subjects’ rights can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>  Anyone who wishes to examine their personal data held by the area meeting may do so on application to area meeting trustees. |
| Complaints | Anyone who wishes to complain about how the area meeting has handled their data, should contact area meeting trustees ([dataprotection@hhq.org.uk](mailto:dataprotection@hhq.org.uk)).  If they wish to take the complaint further they should contact the Information Commissioner’s Office (<https://ico.org.uk/>). |