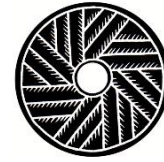


# WALFORD MILL EDUCATION TRUST LTD

## Data Protection Policy and Register of Systems



WALFORD MILL

### A) Data Protection Policy

Last updated	6 December 2023
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### Definitions

<b>WMET</b>	Means Walford Mill Education Trust (registered charity no. 1049540)
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	Means T F Wheeler, Chairman of the Board of Trustees
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

#### 1. Data protection principles

WMET 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.”

## **2. General provisions**

- a. This policy applies to all personal data processed by WMET.
- b. The Responsible Person shall take responsibility for WMET’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. WMET is registered with the Information Commissioner’s Office as an organisation that processes personal data (registration number ZA218144, expires March 2024).

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, WMET shall maintain a Register of Systems.
- 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 the charity shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by WMET must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. WMET 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 the Charity’s systems.

## **5. Data minimisation**

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

## **6. Accuracy**

- a. The Charity 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.

## **7. Archiving / removal**

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

## **8. Security**

- a. The Charity 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 (Trust Administrator, Bookkeeper and trustees) 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.

## **9. 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, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Version 1.4

Reviewed and approved by WMET Board:

6 December 2023

Reviewed annually

# B) Register of Systems

Last updated: December 2023

## Introduction

In accordance with the General Data Protection Regulation, this document sets out the approach of Walford Mill Education Trust (WMET) to the collection, use and management of the personal data of its members under the following headings:

- The data we collect and in what way
- How the data are stored and who has access to them
- Sharing the data
- Purpose for which the data are used
- Data removal and archiving

## The data we collect and in what way

Data by consent: names, addresses and email addresses or phone numbers of “friends”, people who wish to be kept informed of activities and events at Walford Mill and have given their consent to their data being used for this purpose, either through a completing a paper form or by emailing their request. This data is kept in an Excel spreadsheet. WMET does not keep data on people who attend workshops at Walford Mill, this is entirely the responsibility of the tutors who deal with their own workshop bookings.

Data by contract: names, addresses and contact details for people who have contracts with WMET to rent space at the Mill for use as a studio (permanent or temporary), for the purpose of holding workshops, for holding exhibitions, for selling their work, and for providing services to WMET, e.g. window cleaning. This data is kept in the form of paper contracts and/or Excel spreadsheets and on Google forms. It is also kept in Sage to allow preparation of invoices.

Data by legal obligation: names, addresses, phone numbers, national insurance numbers, tax codes of employees for taxation and pension purposes. This is kept on paper and on Nest (Government pension scheme).

Data by vital interest: none is collected

Data by public task: none is collected

Data by legitimate interest: names, addresses, email addresses, phone numbers of volunteers, trustees and other interested people to allow the charity to communicate with them on matters relating to the operation of the charity, and to answer general enquiries about the activities of Walford Mill. This data is kept on paper, on Outlook and in Word and Excel documents.

## **How the data is stored and who has access to it**

Data is stored in locked filing cabinets and on the hard drive of the Trust Administrator, the Site Coordinator, the Trust Chairman and the Trust Bookkeepers laptops and PCs. Only the Trust Administrator, Site Coordinator, Bookkeeper and the Chairman and two other Trustees have access to these computers and to the filing cabinets. The Trust Administrator, Site Coordinator and Bookkeeper maintain and update the data. Access to the laptops and PCs is password protected and the data is regularly backed up onto the cloud. The office at Walford Mill is kept locked when the building is empty. The Trust Administrator and Bookkeeper take their laptops home where they are kept secure following usual household security procedures.

## **Sharing the data**

The data kept is shared between the Trust Administrator, Site Coordinator, Bookkeeper and the Trustees. It may also be shared with resident makers to enable them to invite previous exhibitors, tutors and crafts people to take part in future exhibitions and workshops. It is also shared with the charity's accountants, Frost and Co as they are contracted to perform functions such as payroll.

The data will not be shared with any third party unless legally obliged to do so.

## **Purpose for which the data is used**

The data is processed on the basis of legitimate interest.

The data is used primarily in the organisation of future events and activities such as exhibitions and workshops, and arranging trustee meetings. It is also used in the day to day operation of Walford Mill (e.g. payroll, arranging regular services like cleaning). It may also be used for contacting "friends" of Walford Mill to advise them of future events and activities.

## **Data removal and archiving**

Data by consent will be reviewed at least every three years and the data owners contacted to see if they wish to remain on the mailing list. If they wish to be removed this will be done within 28 days of their request. Data provided by consent will also be removed at any time at the owners request.

Data by contract will be reviewed every two years. If the contract is no longer current the data will be archived for 3 years in case of future queries about the contract, and then deleted.

Data by legal obligation be kept for 6 years.

Data by legitimate interest will be kept for 6 years.

Obsolete digital data storage systems, such as PCs, laptops, hard drives will be data cleansed and disposed of safely.