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Data Protection Policy

Buckingham Churches Holiday Club needs to be able to gather and use certain information about individuals that use the service we provide. This policy describes how this personal data is collected, handled and stores to meet with data protection standards.

**This policy ensures that Buckingham Churches Holiday Club (BCHC):**

* Complies with data protection law and follows good practice.
* Protects the rights of those using the data for the purposes of running the services connected with Buckingham Churches Holiday Club.
* Is open about how it gathers, processes and stores data.
* Protects itself from the risks of data breach.

**The Data Protection Act states that personal data must be:**

1. Used fairly and lawfully
2. Used for limited, specifically stated purposes
3. Used in a way that is adequate, relevant and not excessive
4. Accurate
5. Kept no longer than absolutely necessary
6. Handled according to people’s data protection rights
7. Kept safe and secure
8. Not transferred outside of the European Economic Area without adequate protection

**The following processes are how we will keep data within the regulations stipulated:**

* All administrative staff allocated with the role designated to data handling have the responsibility of ensuring that any data collected by them is stored and handled appropriately.
* Only carefully selected team will have access to data collected and will hold a role specifically related to the need for data to be collected.
* Data will only be collected and stored within the Google Account linked to BCHC and managed to email addresses within that account.
* Data will not be shared informally.
* BCHC will ensure those handling data are informed of their responsibilities when handling data.
* Strong passwords will be used and not shared.
* Personal data will not be disclosed to unauthorised people either within BCHC or externally.
* Data should be reviewed and updated if it is found to be out of date using the ‘Bin or Keep’ retention period suggested.

**Data Storage:**

Paper documents should be kept in a secure place where unauthorised persons cannot view them.

Paper files should be kept in a locked drawer or filing cabinet.

BCHC should make sure that documents/printouts that contain personal data are not visible to others.

When data is no longer required it should be shredded.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. Data should be protected by strong passwords that are changed regularly and never shared between BCHC members.

If data is stored on removable devices these should be kept locked away securely when not being used.

BCHC will ensure data that needs to be kept for Safeguarding purposes will do so in line with Safeguarding Data Collection laws in a secure place.

**Data Use:**

When working with personal data, BCHC shuld ensure that the screens of tehir computer cannot be read by others and lock when unattended.

Personal data should never be shared informally.

Personal data should never be transferred outside of the European Economic Area.

**Data accuracy:**

BCHC should take reasonable steps to ensure that data is kept accurate and up-to-date.

It is the responsibility of all those within BCHC that are authorised to use data to take reasonable steps to ensure it is kept as accurate and up-to-date as possible.

Data will be held in as few places as possible and creating unnecessary data sets should be avoided.

Data should be updated as inaccuracies are discovered.

**Subject access requests:**

All individuals who are the subject of personal data help by BCHC are entitled to:

* Ask what information BCHC holds about them and why
* As how to gain access to this data and keep it up-to-date
* Be informed on how we BCHC keep and process their data

If an individual contacts BPC requesting this information, this is called subject access request. These can be made by email, addressed to the data controller at info@bcholidayclub.org.uk. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

**Disclosing data for other reasons:**

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, BCHC will disclose data requested. However, the data controller will ensure the request is legitimate, seeking assistance from the BCHC Steering Committee and legal advisers where necessary.

**Providing information:**

BCHC aims to ensure that individuals are aware that their data is being processed, and that they understand:

* How their data is being used.
* How to exercise their rights.

**Policy Date: March 2019**