

# HERITAGE TRUST NETWORK

## Data Protection Policy, including Key Procedures

	<b>Obligations and procedures</b>
<b>Aims of this Policy</b>	<p>HTN needs to keep certain information on its employees, members, stakeholders, volunteers and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.</p> <p>The organisation is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulations (2018). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also outlines key data protection procedures.</p> <p>This policy covers employed staff, trustees, volunteers, HTN members and Corporate Supporters.</p>
<b>Definitions</b>	<p>In line with the GDPR 2018 principles, Heritage Trust Network will ensure that personal data will:</p> <ul style="list-style-type: none"> <li>• Be obtained fairly, lawfully and transparently and shall not be processed unless certain conditions are met*</li> <li>• Be obtained for a specific and lawful purpose</li> <li>• Be adequate, relevant but not excessive</li> <li>• Be accurate and kept up to date</li> <li>• Not be held longer than necessary</li> <li>• Be processed in accordance with the rights of data subjects</li> <li>• Be subject to appropriate security measures</li> </ul> <p>*The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.</p>
<b>Type of information</b>	<b>Heritage Trust Network</b> processes the following types of personal information (additional information may be collected and processed when necessary):



<p><b>processed</b></p>	<p><b>Members</b> – This category includes Individual, Student, Full and Start-up members as well as Corporate Supporters.</p> <p>Information which could collected and held includes:</p> <ul style="list-style-type: none"> <li>• contact details (email, address and phone numbers) for individual within member organisations</li> <li>• details of the formation and legal structure of the organisation holding membership</li> <li>• details of the projects being undertaken by the member organisation</li> <li>• details of the experiences/skills of some individual members</li> <li>• research questionnaire results completed by individuals for a group</li> <li>• bank account details (to allow for refunds were applicable)</li> <li>• funding application bids (when requested by the member)</li> <li>• proof of student status</li> <li>• references from other heritage organisations (Corporate Supporters only)</li> <li>• photographs</li> </ul> <p><b>Potential members:</b></p> <ul style="list-style-type: none"> <li>• contact details (email, address and phone number)</li> <li>• project details</li> </ul> <p><b>Employees and potential employees</b></p> <ul style="list-style-type: none"> <li>• contact details (email, address and phone number)</li> <li>• bank account number</li> <li>• payroll information</li> <li>• appraisal notes</li> <li>• CVs and references</li> <li>• next of kin details</li> <li>• pension scheme details</li> <li>• photographs</li> </ul> <p><b>Trustees</b></p> <ul style="list-style-type: none"> <li>• Contact details (email, address and phone number)</li> <li>• Bank account details</li> </ul>
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	<ul style="list-style-type: none"> <li>• CVs and photographs</li> </ul> <p><b>Volunteers</b></p> <ul style="list-style-type: none"> <li>• contact details (email, address and phone number)</li> <li>• bank account number</li> <li>• appraisal notes</li> <li>• CVs and references</li> <li>• photographs</li> </ul> <p>Personal information is kept in the following forms:</p> <ul style="list-style-type: none"> <li>• held electronically on computers</li> <li>• held on backup drives held in the office in a locked desk</li> <li>• held on protected datasticks which are occasionally taken off site to allow for flexible staff working</li> <li>• held on paper files which are locked in the office</li> <li>• on the HTN website</li> <li>• on the Xero accounting website</li> <li>• on the MailChimp site (For the purpose of mailing out the HTN newsletter.)</li> <li>• on the Monday.com site (For the purpose of membership administration.)</li> </ul> <p>Groups of people within the organisation who will process personal information are:</p> <ul style="list-style-type: none"> <li>• employed staff</li> <li>• trustees</li> <li>• volunteers (only occasionally)</li> <li>• accountants and marketing consultants</li> </ul>
<p><b>Responsibilities</b></p>	<p>Overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of Heritage Trust Network, this is the Board of Trustees.</p> <p>The governing body delegates GDPR tasks to an allocated Trustee. The allocated trustee is responsible for:</p> <ul style="list-style-type: none"> <li>• understanding and communicating obligations under the GDPR</li> <li>• identifying potential problem areas or risks</li> </ul>

	<ul style="list-style-type: none"> <li>• encouraging training of staff and volunteers including Trustees</li> <li>• annually renewing latest guidance about data protection</li> </ul>
<b>Policy Implementation</b>	<p>To meet our responsibilities staff, volunteers and trustees will:</p> <ul style="list-style-type: none"> <li>• Ensure any personal data is collected in a fair and lawful way;</li> <li>• Explain why it is needed at the start;</li> <li>• Ensure that only the minimum amount of information needed is collected and used;</li> <li>• Ensure the information used is up to date and accurate;</li> <li>• Review the length of time information is held;</li> <li>• Ensure it is kept safely;</li> <li>• Ensure the rights people have in relation to their personal data can be exercised</li> </ul> <p>We will ensure that:</p> <ul style="list-style-type: none"> <li>• Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;</li> <li>• Queries about handling personal information will be dealt with swiftly and politely.</li> <li>• Any disclosure of personal data will be in line with procedures.</li> </ul>
<b>Training</b>	<p>Training and awareness raising about GDPR and how it is followed in this organisation will take the following forms:</p> <p>On induction:</p> <ul style="list-style-type: none"> <li>• Staff, volunteers and trustees will all receive a written procedure about handling personal data, even if their contact with personal data is limited.</li> <li>• Any queries and any training needs should be addressed to the allocated Trustee</li> <li>• Any new staff or volunteers will be inducted into procedures for secure items as appropriate.</li> </ul> <p>General training/ awareness raising:</p> <ul style="list-style-type: none"> <li>• There will be an annual GDPR monitoring and training session for all staff and volunteers.</li> </ul>



<b>Gathering and checking information</b>	<p>Before personal information is collected, we will consider:</p> <ul style="list-style-type: none"> <li>• what the minimum amount of data that is needed to provide our services to an individual</li> <li>• how long we need the data for</li> <li>• security for that information and who has access to it</li> <li>• how the data will be processed</li> </ul> <p>We will inform people whose information is gathered about the following:</p> <ul style="list-style-type: none"> <li>• that HTN has a Privacy policy</li> <li>• who any enquiries or comments about personal data should be addressed to</li> </ul> <p>We will take the following measures to ensure that personal information kept is accurate:</p> <ul style="list-style-type: none"> <li>• keep regular contact with members to ensure information is up to date</li> </ul> <p>Special Category Data will not be used apart from the exact purpose for which permission was given or for the fulfilment of legal obligations.</p>
<b>Data Security</b>	<p>Heritage Trust Network takes steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure.</p> <p>Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary proceedings</p> <p>Any unauthorised disclosure of personal data to a third party by a volunteer or trustee may result in:</p> <ul style="list-style-type: none"> <li>• possible penalties for a Trustee, including removal from the Board</li> <li>• termination of the volunteering agreement and refusal to offer a reference for a volunteer.</li> </ul>
<b>Subject Access Requests</b>	<p>Anyone whose personal information we process has the right:</p> <ol style="list-style-type: none"> <li>1. To be informed</li> <li>2. Of access</li> <li>3. Of rectification</li> </ol>



	<ol style="list-style-type: none"> <li>4. Of erasure / the right to be forgotten</li> <li>5. To restrict processing</li> <li>6. To data portability</li> <li>7. To object</li> <li>8. To make choices about automated decision making and profiling</li> </ol> <p>Individuals have a right under the GDPR to access personal data being kept about them by Heritage Trust Network. Any person wishing to exercise this right should apply in writing to the Heritage Trust Network at either <a href="mailto:data@heritagetrustnetwork.org.uk">data@heritagetrustnetwork.org.uk</a> or 13-15 Fleet St, Birmingham, West Midlands, B3 1JP. We then have one calendar month to respond unless the request is considered to be particularly onerous in. In those circumstances, the data subject will be informed that an extension has been added to the time allowed to fulfil the request.</p> <p>The following information will be required before access is granted:</p> <ul style="list-style-type: none"> <li>• Full name and contact details of the person making the request</li> <li>• Their relationship with the organisation (former/ current member of staff, trustee or other volunteer, service user)</li> <li>• Any other relevant information</li> </ul> <p>We may also require proof of identity before access is granted. The following forms of ID will be accepted:</p> <ul style="list-style-type: none"> <li>• Driver's licence</li> <li>• Passport</li> </ul>
<b>Review</b>	<p>This policy is currently undergoing review. This edition 18/5/18.</p> <p>This policy will be reviewed at intervals of every 2 years to ensure it remains up to date and compliant with the law.</p>

