



DATA PROTECTION POLICY AND PROCEDURES

Date Written:	28/11/2018	Author:	C. Collier
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PRIVACY/DATA PROTECTION POLICY

Data Protection is an issue the Swindon Food Collective takes very seriously.

Beyond compliance, we aim to observe best practice to protect and reassure our various contacts and clients. In short, we commit to procedures that protect sensitive data at all times with password encrypted systems, secure record-keeping, and files that are regularly reviewed, updated and, if necessary, deleted.

Our Data Protection Policy refers to our commitment to treat information about employees, clients, stakeholders and other interested parties with the utmost care and confidentiality. Through this policy, we will ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights. It is presented to all staff and volunteers as part of the induction and is available to clients and stakeholders upon request.

SCOPE

This policy refers to all parties (employees, volunteers, candidates, members, clients, suppliers etc.) who provide any amount of information to us. Employees and volunteers of our organisation must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or who acts on our behalf and may need occasional access to data.

GENERAL

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our organisation collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the rules below apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the organisation within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties
- Made available only to individuals with a legitimate reason to see and use it
- Within a reasonable timescale, accessible to individuals to whom the data relates
- Largely kept electronically and paper files will be held securely

Our data will not be:

- Communicated informally
- Stored for more than a specified amount of time or longer than it is needed
- Transferred to organisations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the organisation has direct obligations towards people to whom the Data belongs.

We will:

- Be transparent so people know which of their data is collected
- Provide information to people about how we'll process their data
- Be clear about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

DATA WE KEEP

Swindon Food Collective currently keeps data for the following purposes:

- Bookkeeping, raising/paying invoices, administrating tax, etc.
- Communications with all stakeholders including members, clients, suppliers and consultants
- Population of the members directory as required by our M&A
- Publicity, marketing and general trading purposes
- To ensure good governance of the charity and to comply with legal requirements
- To ensure Swindon Food Collective delivers its charitable purposes
- Personnel, checking references, D&B checks and monitoring equal opportunities, and emergency contact details

Data subjects include:

- Members, directors, consultants, workers, employees, and volunteers
- Clients who have received food from Swindon Food Collective
- Suppliers who have provided (or may provide) products and services to Swindon Food Collective

The kinds of details we keep are:

- Contact and other personal details
- Personnel information such as application details, training and personal development information
- Information on gender, race, health conditions, offences/criminal record
- Payroll information
- Accountancy information such as charges paid to suppliers

Some information is made available to the following bodies:

- People whose data the organisation holds
- HMRC, Companies House and other government and legal authorities
- Staff, managers and volunteers who need to see information to undertake their duties for Swindon Food Collective
- The organisation's accountant and, when appropriate, legal and other advisors
- Funders who have a legitimate need to see evidence of activities

ACTIONS

To exercise data protection we will:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees and volunteers in online privacy and security measures
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data

- Where appropriate establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)
- Publicise our data protection provisions on our website

DISCIPLINARY CONSEQUENCES

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

GDPR

Swindon Food Collective has taken steps to become compliant with the new General Data Protection Regulations enforced in May 2018.

Our data processing is compliant with the lawful basis of 'Consent'. As the law specifies, we "can show that an individual has performed a clear affirmative action to allow us to process their personal data for a specific purpose".

All of our electronic communications request affirmative action in order to continue receiving contact from Swindon Food Collective.

Individuals who choose to sign up to Swindon Food Collective's communications in person at an event or similar via paper sign up, will be required to indicate their consent to be contacted before we add the individual to our database.

Swindon Food Collective ensures that contacts can exercise the right to be informed about the use of their data via clearly labelled disclaimers at the point providing personal data.

All of our contacts have the right to request access to, rectify, restrict and erase their data.

Any contact may exercise any of their rights above, by contacting Swindon Food Collective directly through clearly signposted methods on <https://www.swindonfoodcollective.org/>