

# Policy for Safeguarding Personal Data

## Edition 4.0 10th March 2019

### References:

- A. GDPR can be found at: <https://gdpr-info.eu/>
- B. The Guide to the GDPR issued by the Information Commissioner's Office is at:  
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

### Terminology

<u>Term</u>	<u>Definition</u>
The CIC	The Farnham Biodiversity Group CIC, a community interest company enabling a legal identity and limitation of liability.
The Project	The Farnham Biodiversity Partnership, a project of the CIC with the goals of creating, monitoring and facilitating the execution of a Farnham Biodiversity Action Plan.
The Partnership	The Project
The Board	The directors of the CIC.
The Steering Group	The decision making group for the Project, drawn from individuals representing partnering organisations of the Project.
The Partners	Organisations which have elected to join the Project, with the common goals of improving and maintaining the biodiversity of Farnham.
Farnham	The area of operations for the Project. This includes the Farnham town and rural areas, defined by the boundaries of the Farnham Wards.
The Policy	This policy for safeguarding personal data. The Policy covers operations by the CIC and the Project.

### Introduction

1. The Farnham Biodiversity Group (FBG) has been formed as a Community Interest Company (CIC) to enhance natural conservation in the local area for the benefit of wildlife and the people of Farnham. In order to fulfil this objective and to ensure efficient administration, the Group holds a limited amount of Personal Data.

#### Aim

2. The aim of this document is to establish a robust Policy compliant with GDPR to enable the Farnham Biodiversity Group to safeguard the Personal Data it holds.

#### Lawful Requirement to Hold Personal Data

3. FBG is a Community Interest Company set up in February 2019 to focus better the activities of partnering organisations and individuals undertaking conservation work in Farnham. These include local experts, volunteer groups, local authorities and other professional bodies. Their project work is carried out by means of the Farnham Biodiversity Partnership, a project within the Company. This policy document applies to the Farnham Biodiversity Group CIC and, by extension, to the Farnham Biodiversity Partnership project.

4. In order to conduct its affairs in an orderly, efficient and safe way, FBG has a legitimate requirement to hold some Personal Data. Within the terms of GDPR there is thus a Lawful basis for data to meet the Legitimate Interests of the group (**GDPR Article 6 sub-section (f) and reference B**, Section on Lawful Basis for Processing).

5. The principle representatives of the partners have voluntarily elected to join the Project on behalf of their members. They are invited upon joining to give written consent to the processing of their personal data. This provides an additional lawful basis by Consent for FBG to process such data (**GDPR Article 6 sub-section (a)**)

### **Responsibilities**

6. A Board Members of the CIC are appointed as Controller and Processor to oversee the implementation of this Policy. Current officials are:

**Controller:** Mr S Langham

**Processor:** Mr N Moss

### **Personal Data required by FBG**

7. The Personal Data of Members are required by the Group to enable it to, for example:

- a. Call upon members to provide technical data on wildlife species and habitats
- b. Send out notifications about meetings, work sessions, and other events
- c. Have the ability to pass on information quickly about incidents or changes to the programme of work, for example in the event of bad weather or catastrophic events such as heathland fires.
- d. Circulate general information on conservation matters and relevant local affairs
- e. Send out committee papers, periodic reports and other documentation
- f. Hold adequate contact information in the event of illness or emergency situations

The Group will also, for historical and publicity reasons, retain photographs of its activities which may contain images of members. Images of places and species will also be held.

There is no requirement to hold Financial Personal Data.

### **Personal Data Items to be held by FBG**

8. To meet the above requirements the following Personal Data may be collected and processed:

Title, full name, postal address, e-mail address, landline and mobile phone numbers

Emergency contact name and telephone number.

Details of qualifications relevant to the work of the Group (for example, first aid trained) and personal preferences such as attitude to use and publication of photographs.

Details of any medical condition that may affect individual members' ability to undertake difficult or strenuous tasks

Activity photographs as they occur

### **Data Protection Principles**

9. The collection and processing of data in the Group is to be carried out in strict accordance with the principles set out in Article 5 of GDPR. Data must be:

Processed fairly, lawfully and transparently in relation to the Members.

Collected for the specified purposes set out above and not further processed for incompatible purposes

Relevant and limited to what is necessary for the effective work of the group

Accurate and kept up to date

Kept in hard copy and electronic format that permit identification of members while they are active in the Group but for no longer than is prudent

Processed in a secure way that ensures protection against unauthorised processing, accidental loss, destruction or damage, using the technical and organisational measures set out below.

### **Acquisition and Processing of Personal Data**

10. Potential new partners of the Project are invited by the FBP Steering Group to join and are made aware in an agreed Memorandum of Understanding that the personal data of their representatives will be collected and protected in accordance with this Policy.

11. Affiliation with the Project is not confirmed until the Processor is in possession from partner representatives of their informed and unambiguous consent to the specific uses it is intended to use their data for.

12. Consents will be obtained in the form shown in the Privacy Notice shown at Annex A to this document.

17. The Processor is to file the the MOUs after transcribing Personal Data onto the secure database which is to be regularly kept up to date as changes occur. Copies are made available to nominated members of the committee. This provides resilience for FBGs operations in the event of illness or other unforeseen circumstances affecting management of the group.

### **Rights of Personal Data Providers**

18. Throughout the procedure of collecting, processing and storing data, the Controller and Processor are to be aware of the need to uphold the rights of personal data providers by:

a. Informing them of the way in which their data is being used through updates to the Policy via the FBP website or other means as necessary.

b. Facilitating when requested:

- Access to their Personal Data
- Rectification when changes have occurred
- Erasure
- Restriction of processing
- Logging objections

No automated decision making will take place in FBG.

### **Privacy Notices**

19. Issue of Privacy Notices as in Annex A will be the main way of upholding the first principle of data protection by informing members transparently that their data are being held and processed fairly and lawfully. An example is included at Annex A.

### **Security of Personal Data**

20. The following measures and procedures are to be used to ensure security of the Personal Data held by FBG:

Consent forms and MOUs to be filed and stored securely by the Processor

The electronic personal data may, as required, be distributed by the Processor to the Chairman and Secretary of the Board and also to the Steering Group of the Partnership.

Personal data is to be kept up to date as changes become apparent and reissued at the discretion of the Processor.

Personal data on those who have ceased to be members for any reason may be retained for up to one year in case issues arise, but are then to be deleted

Previous personal data to be erased or shredded as soon as new ones become available

Under no circumstances is personal data to be made available to another individual or organisation. Individual data elements, such as a phone number, may be passed on to a third party only with the express permission of the member concerned.

Multiple e-mail addresses in a single e-mail are to be hidden from other recipients by use of the Blind Carbon Copy (BCC) facility

Immediate action is to be taken to deal with security breaches including notification to individuals if there is a high risk to their rights and freedoms. The Controller is to be informed of all breaches.

## Privacy Notice

In order to carry out its extensive conservation work in the local area in an orderly, efficient and safe way, the Farnham Biodiversity Group (FBG) has a requirement to hold a small amount of your personal information. We do this in a lawful manner in accordance with the detailed procedures set out in our Policy for Safeguarding Personal Data given on our website at <http://FarnhamBAP.org.uk/>

### 1. Who we are

As the Data Controller, a Board Member of FBG decides how the personal data provided by you is processed and for what purposes.

### 2. What personal data we collect and why

FBG collects:

- (i) Phone numbers postal addresses and email addresses to contact you about activities of the group and to keep you informed about matters of conservation interest
- (ii) Information relating to any medical conditions you have to ensure that you are not allotted any tasks unsuitable or hazardous to you or others
- (iii) Contact information to allow urgent communication in the event of changes to the programme of events or in emergency situations.
- (iv) Photographs of Group activities which may contain images of members

We keep your personal data only for the period during which you remain a Member.

### 3. Sharing of Data

We do not share your data with any third parties except with your prior consent or if required by law to do so

### 4. Your rights

You have the right to request:

- (i) A copy of your personal data held by us and if necessary have them amended
- (ii) Erasure of your personal data
- (iii) Withdrawal of your consent to processing

For further information please refer to our Safeguarding Policy which can be found on our website <http://FarnhamBAP.org.uk/>

If you have any queries or want to exercise any of your rights please contact The Data Processor at Noel Moss at [information@bourneconservation.org.uk](mailto:information@bourneconservation.org.uk)

## Personal Data

Title		First name	
Surname			
Date of birth			
Address line 1			
Address line 2			
Address line 3			
Town		Postcode	
Email address			
Landline number			
Mobile number			
Emergency contact		Number	

I have received information on the Group's Health and Safety Policy	
I have received information on the Group's Children's Safeguarding Policy	
I agree / do not agree to inform the team leader at future work sessions of any medical condition that may affect my ability to undertake any tasks	
I agree / disagree to have my photo taken at work sessions and the image to be published in group publicity material such as website, press articles and newsletters	

## Consent Statements

By signing this form I am giving The Farnham Biodiversity Group (FBG) explicit consent to process my personal data for the purposes given below and I confirm the details I have given are correct.

I agree/disagree to the following statements	Yes/No
FBG may hold my personal data and process it in order to send me notifications of work sessions and other events	
FBG may hold my personal data and process it in order to send me general information in the form of newsletters, reports and other documents	
FBG may hold adequate contact information in order to inform me quickly of incidents or changes to the programme and for use in any emergency situation	
FBG may use the following means of communication to contact me: Telephone                  Mobile Phone                  e-mail	
<b>Signed</b>	<b>Date</b>