

Gloucestershire Arthritis Trust's Data Protection Policy – May 14th 2018

Introduction

The Gloucestershire Arthritis Trust (Reg Charity No. 288346) is committed to compliance with the requirements of the General Data Protection Regulation (GDPR). Security of supporters' personal data is very important to us and we will ensure that we have appropriate controls and procedures in place to provide protection.

Gloucestershire Arthritis Trust (GAT) is the '**data controller**' under the terms of the legislation meaning that it is ultimately responsible for controlling the use and processing of personal data.

GAT Trustees have responsibility for overseeing, monitoring and reviewing this Data Protection Policy.

The Secretary (Steve Morton) is responsible for all day-to-day data protection matters; addressing any concerns regarding data held, how it is processed and encouraging good information handling.

There are two definitions of data covered by GDPR. '**Personal Data**' is information about a living individual which is capable of identifying that individual. '**Special Category Data**' is defined as personal data consisting of information such as physical or mental health, sexual orientation and religious/philosophical beliefs. GAT only processes '**Personal Data**.'

Processing has a broad definition and is not restricted to data that is worked upon but incorporates many activities including collecting, storing, using, recording and deleting. Any processing of personal data will be undertaken in accordance with the following principles.

1. **Processing personal data fairly and lawfully**

Telling people how we will use their data. Whenever we collect/obtain someone's data, GAT will tell them what we will use their data for and that we do not share/swap or sell their data.

2. **Using data for the correct purpose**

GAT will ensure that the reason for which it collected the data originally is the only reason for which it will process the data. Consent will be the basis for processing. Data will not be shared with other third parties.

3. **Any personal data collected will be adequate, relevant and not excessive**

GAT will not seek to collect any additional personal data which is not relevant to the purpose for which it was obtained. Forms for collecting data, such as our **Joint Supporter Club (JSC)** membership will always be drafted and proofed with this in mind before being published.

4. **Keep personal data accurate and up-to-date**

GAT will review and update all data on an Annual basis as it publishes an Annual Supporter Magazine. It is the responsibility of the individual who supplied their personal data to ensure that this is accurate and each individual, or a family member, should notify us if a change in circumstances means that data needs to be updated or deleted. This can be done, free of charge,

via GAT's website: www.glosarthritis.org and clicking on the **Contact page**, or the individual/family member can write to GAT's office at Parkside asking for changes to be made.

5. Data will not be kept for longer than necessary

GAT undertakes not to retain personal data for longer than is necessary. This means that we will undertake a regular review of the information held and delete data accordingly.

6. Data will be kept secure and in a system that permits easy identification of the data subject

GAT will ensure that all personal data is accessible only to those who have a valid reason to see it. We will have appropriate security measures in place such as: 4 digit security lock to enter the building, hard copy personal data being kept in a lockable office which requires access with a key (held only by the Secretary), password protected access to electronic data (under development) and having an in-house shredding facility for the disposal of confidential paperwork.

GAT recognises the rights of the individual to be informed, to have the right of access, the right of rectification, the right to erasure, the right to data portability, the right to object to processing and the right to restrict processing in certain circumstances.

Subject Access Rights

We recognise an individual's right to access any personal data relating to them. Should any individual wish to exercise this right they should apply in writing to the GAT Secretary. Information will be provided within one week of receipt of such a request.

Personal Data Breaches

Breaches must be notified immediately to the Secretary who will report this to the Information Commissioner's Office (ICO) within 72 hours.

Policy Review

This policy will be updated as necessary to reflect best practice in data management, security and control to ensure compliance with any changes or amendments to the GDPR and other relevant legislation. The trustees of GAT will review the policy annually, or earlier, if necessary.

Steve Morton
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