



Data Privacy - Guiding Principles

Overview

In addition to existing UK Data Protection legislation, the European General Data Protection Regulations (GDPR) came into effect in the UK on 25th May 2018. We have completed the online assessment to assess whether Tibberton Community Shop (TCS) needs to register with the UK Government's Information Commissioner's Office (ICO) - because we hold and process our members' and volunteers' personal data to enable us to operate and meet our legal requirements.

Quoting from the online assessment result: ***"You are under no requirement to register Some not-for-profit organisations are exempt and based on the information you have provided you do not have to register with the ICO. However, it is important that your organisation adheres to the principles of the Data Protection Act (DPA) and understands best practice for managing information."***

A copy of the completed assessment outcome is held by the Management Committee's Secretary.

(For more information please see: <https://ico.org.uk/for-organisations/register/self-assessment/>)

Following on from that, to help TCS meet its data protection obligations, the Management Committee has now produced the following **Data Protection Guiding Principles** to guide how we gather, store and use the personal data of our members and volunteers. If you have any questions about this, please do contact me via the email link on the TCS website: <https://www.tibbertonvillageshop.co.uk>; thank you.

The Management Committee of Tibberton Community Shop voted unanimously to adopt these Data Privacy Guiding Principles at the meeting on 25 July 2018 and agreed to publish them in the 'Shop Guide' and on the Shop's website.

Nick Greenall
Tibberton Community Shop
Secretary and Data Controller

26 July 2018



Data Privacy - Guiding Principles

Background

This document explains what Tibberton Community Shop (TCS) does with the 'personal data' it holds for its members and volunteers.

What is 'personal data'?

Personal data relates to a living individual who can be identified from that data. The collection, storage and processing of personal data is governed by the General Data Protection Regulation 2016/679 (GDPR); which is much wider in scope than the UK's 1998 Data Protection Act.

What is TCS's role in processing your personal data?

TCS is an organisation which processes personal data to enable it to operate and, under the terms of the GDPR, has to appoint a 'Data Controller' to advise its Management Committee on policy and decisions about how it collects, stores and processes your personal data and for what purposes. The Management Committee has appointed the Secretary to be TCS's nominated Data Controller.

How does TCS comply with its GDPR obligations?

TCS complies with its GDPR obligations by:

- Keeping personal data up to date
- Storing and destroying it securely
- Using it only for authorised purposes
- Not collecting or retaining excessive amounts of data
- Ensuring that appropriate measures are in place to protect the data from loss, misuse, unauthorised access or disclosure.
- Members' and volunteers' personal data is held principally in three separate Registers:

1. Members' Register

We hold the following Members' personal data and use it as outlined below:

- Name
- Home address
- Contact details and preferred contact method: email / home telephone / mobile / post
- Share certificate number
- An indicator to show if a member is an active volunteer too

We use Members' personal data for the following purposes:

- To maintain a record of our membership
- To keep members informed of TCS's business results and meetings, e.g. Annual or Special General Meetings
- To comply with the requirements and legal obligations of TCS's Registration under the Co-operative and Community Benefits Societies Act 2014.
- This data is held on a password protected computer file, securely backed up on the iCloud.

2. Management Committee Register

We hold the following Management Committee personal data and use it as outlined below:

- Name
- Home address
- Contact details and preferred contact method: email / home telephone / mobile / post



- A record of their tenure of service is also kept, including when re-elected

We use Management Committee members' personal data for the following purposes:

- To maintain a record of our Management Committee membership
- To enable Members or Volunteers to contact the Management Committee on TCS business
- To comply with the requirements and legal obligations of TCS's Registration under the Co-operative and Community Benefits Societies Act 2014.
- This data is held on a password protected computer file, securely backed up on the iCloud.
- An extract of contact details is kept as a paper copy in the Shop Guide, for quick access by volunteers to enable the Shop to function smoothly
- Management Committee members *may* provide the Treasurer with their bank account information to enable the prompt repayment of expenses. Their bank account data will not be held in paper or digital formats by the Treasurer but only kept on the TCS Bank's systems to enable payments to be made.

3. Volunteers' Register

We hold the following Volunteers' personal data and use it as outlined below:

- Name
- Home address
- Contact details and preferred contact method: email / home telephone / mobile / post
- Preferred shop rota shifts
- An indicator to show if an active volunteer is a member too.

We use volunteers' personal data for the following purposes:

- To maintain a record of our volunteers
- To keep volunteers informed of TCS's business results and meetings
- To be able to contact volunteers so we can operate an efficient and effective Shop shift rota
- This data is held on a password protected computer file, securely backed up on the iCloud.
- An extract of contact details is kept as a paper copy in the Shop Guide, for quick access by volunteers to enable the Shop to function smoothly.

TCS also holds other personal data about its volunteers; what data and why TCS holds it is explained below.

Volunteers' Emergency Contact and Health Information

We hold the following personal data relating to our Volunteers' Emergency Contacts and Health Information and use it as outlined below:

- Emergency contact's name and home address (for up to 2 emergency contacts)
- Emergency contact's home telephone / mobile contact details.

If volunteers wish to disclose it, TCS also holds high level health information about any medical conditions a volunteer has which may impact them in the shop and which, for health and safety purposes, it is prudent for the Management Committee's Volunteers Co-ordinator to be aware of:

- Health Information - medical condition and the possible impact it may have on them.

We use volunteers' emergency contact and health information personal data for the following purposes:

- To maintain a record of our volunteers' emergency contacts
- To meet our duty of care to our volunteers under Health & Safety at Work legislation and obligations
- This data is held on a secure file as signed paper forms, giving TCS consent to hold and use this information for these purposes. It is **not** held on a computer.



Volunteers' Training Records

To meet TCS's obligations under Health and Safety legislation and to comply with insurance requirements, TCS holds training record forms to show that each volunteer has been trained in the main shop operations. These forms are held as paper forms on a secure file by the Data Controller. For legal reasons, separate training record forms for the sale of alcohol under TCS's Age Verification Policy are retained by the TCS alcohol licence holder. The personal data on all training forms is the volunteer's and trainer's names, plus their signatures.

What are the 'lawful bases' TCS must meet for processing personal data?

Under the terms of the GDPR, TCS must demonstrate a 'lawful basis' for all the purposes for which we use your personal data. These are:

Purpose	Lawful Basis
Maintaining Members, Management Committee members and Volunteers personal records	To deliver our legal obligations to members and facilitate how we operate
Administering the efficient and effective operation of the shop by the volunteers	Delivering our commitment to the community as outlined in TCS's Registration under the Co-operative and Communities Benefit Societies Act 2014
Complying with Health and Safety requirements and our duty of care to our volunteers	Meeting our legal obligations under Health and Safety legislation
Complying with insurance policy requirements so that the shop can open	Meeting our legal obligations
Complying with the Co-operative and Communities Benefit Societies Act 2014	Meeting our legal obligations

Do we share your personal data?

Your personal data is treated as strictly confidential and will not be shared with third parties outside of TCS except emergency services if needed. TCS does share information with its service providers who use it to deliver some of our services. They process your personal data based on our instructions, in compliance with this policy and other appropriate confidentiality/security measures. Currently, we use the following service providers:

Service provided	Data processed
Management Committee members expenses repayments via bank transfer at Lloyds Bank	Names, addresses and bank account details

How long do we keep your personal data?

TCS keeps your personal data for no longer than reasonably necessary.

Type of data	Retention period	Justification
Members', Management Committee members and Volunteer's names and contact details	Up to 7 years	Companies Act requirement
Volunteers' emergency contact and health information	Up to 1 year after a volunteer stops working in the shop.	To meet our Health and Safety and business insurance obligations. To enable TCS to meet its duty of care to volunteers, e.g. contacting the nominated emergency contact and notifying the emergency services of any known medical conditions
All Volunteers' training records	Up to 1 year after a volunteer stops working in the shop.	To meet our Health and Safety and business insurance obligations.



Your rights with regard to your personal data held by TCS

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data; the right to request:

- A copy of the personal data that TCS holds about you
- That TCS corrects any personal data if it is found to be inaccurate or out of date
- That your personal data is erased where it is no longer necessary for TCS to retain such data
- That a restriction is placed on further processing where there is a dispute in relation to the accuracy or processing of your personal data; and
- The right to lodge a complaint with the Information Commissioner's Office.

Automated decision making

TCS undertakes no automated decision making using any of your personal data.

Online Volunteers' Rota

This system uses Google Sheets via a secure Internet Service Provider (currently Wix) administered via the Management Committee's nominated Webmaster. Volunteers have an option to receive an automated email (from Gmail) reminder of their next shift. To do this, volunteer needs to enter their email contact details into the online system. This data is held securely in the system managed by Wix. It is for the volunteer to decide if they wish to receive an email reminder and enter their email contact details.

Further Processing

Should TCS wish to use your personal data for a new purpose not covered by these Data Privacy Guiding Principles, then we will provide you with an update version of this document. The new notice will be issued prior to commencing the processing and will outline the relevant purposes and processing conditions. If necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries or complaints, please contact TCS's Secretary in the first instance, using the email link on the TCS website <https://www.tibbertonvillageshop.co.uk>.

Tibberton Community Shop	Policy: Data Privacy Guiding Principles		
	Owner: TCS Management Committee		
Drafted	TCS Secretary	July 2018	Version 0a-d
Approved by	Management Committee	July 2018	Version 1
Revisions from	Caroline Tasker	May 2019	Version 1b
Next review*	Management Committee	March 2021	

*Unless required by legislation changes