



Upper Dales Community Partnership Ltd

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Data Protection Policy

Purpose

This policy explains the procedures the Upper Dales Community Partnership (UDCP) Ltd follows with regards to data protection as regulated by the General Data Protection Regulation Act 2018 (GDPR) in relation to employees, volunteers, customers, partner organisations and stakeholders (Data Subjects).

Principles

UDCP Ltd adheres to this policy to ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights. UDCP Ltd regards the correct treatment of personal information as imperative to successful working and to maintaining the confidence of those with whom it deals.

Policy

UDCP Ltd needs to collect and use certain types of information about the Data Subjects with whom it comes into contact. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, financial data, national insurance numbers etc. The personal information will be collected and dealt with appropriately, either on paper or electronically.

UDCP Ltd complies with the principles of good information handling enforced by the GDPR Act 2018:

- a) Data must be processed fairly and lawfully
- b) Data must only be used for specific purposes
- c) Data must be adequate, relevant and not excessive
- d) Data must be accurate and kept up to date
- e) Data must not be kept for longer than is necessary
- f) The rights of Data Subjects must be respected
- g) Organisations must take appropriate steps to maintain security

Personal Data

If you are an employee of UDCP Ltd you will give us personal information relevant to contractual obligations and payroll systems. These systems are encrypted on computers stored securely within the UDCP Ltd Hawes Community Office. Use of these computers outside UDCP Ltd buildings is strictly prohibited.

**Directors: John Blackie (Chair), Denise Hartill, Allen Kirkbride,
Brian McGregor, Sir Joseph Pilling**



Data Collection

If you act as a volunteer, trustee or recipient of our services you will give us information. This information may include some or all the following: name, date of birth, postal address, email address, telephone contact numbers.

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- a) Contact information for volunteers. This is collected and stored in secure files away from public access. Information is only used for contacting individuals in relation to UDCP Ltd business.
 - b) Contact information for customers booking on Little White Bus trips. Contact numbers or emails are collected to give up to date information on the relevant trip or service. Once the trip is completed, booking forms/lists are destroyed. Please see our separate policy for Data Retention.
 - c) Contact information from individuals and companies who contact UDCP Ltd by email. This is collected on a password protected email server and deleted after six months unless it is part of an on-going business relationship.

Personal data will not be:

- a) used other than for the specific purpose for which it was collected
- b) stored for more than a specified amount of time
- c) distributed to any third parties

Our company collects this information in a transparent way. To ensure this we:

- a) let people know which of their data is collected and how it will be processed
- b) inform people about who has access to their information
- c) allow people to request that we modify, erase, reduce or correct data contained in our databases

UDCP Ltd is committed to:

- a) restrict and monitor access to sensitive data
- b) continually train employees in online privacy and security measures and GDPR regulation
- c) establish and review clear procedures for reporting privacy breaches or data misuse
- d) communicate statements on how we handle data
- e) establish good data protection practices e.g document shredding, secure locks, data encryption, frequent backups, access authorization etc.

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection regulation will invoke disciplinary action as laid out in the UDCP Ltd Disciplinary Policy.

May 2018 v.1

Policy Review Date: November 2018

Directors: John Blackie (Chair), Denise Hartill, Allen Kirkbride,
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