

ROEHAMPTON GARDEN SOCIETY

PRIVACY POLICY

Background:

This policy aims to ensure that the Roehampton Garden Society (RGS) is compliant with the General Data Protection Regulation (GDPR) implemented in May 2018.

Key points in GDPR legislation:

1. Must identify: a data controller – the RGS
A data processor – who chooses the manner of processing
2. The RGS only processes Personal data, not Sensitive personal data (eg. medical records, financial information)
3. Data must be used lawfully, fairly and transparently.
4. Since there is a contractual reason for holding members' data, permission is not needed from members.
5. The data must be limited to specific purposes to enable the running of the RGS and allotments.
6. Data must be deleted if no longer needed. Members have a right to be forgotten.
7. Confidentiality must be sustained and kept securely.
8. Breaches must be reported to the RGS within 72 hours. The RGS must then report the breach to the ICO (Information Commissioner's Office) within 72 hours notification of the breach.

RGS Data Protection Policy:

1. Any data collected will only be used by RGS that is necessary for operational reasons.
2. Only Primary waiting list will be shared with Enable (acting on behalf of Wandsworth) to pick up those on both RGS waiting list and Wandsworth waiting list. No data will be sold or shared with any other organisation or individual.
3. This policy will be available to be read by anyone and will be posted on the RGS website.
4. Data will be kept for the duration of any time on a waiting list and any time there is a current tenancy.
5. Data will be kept securely and only accessed on a 'need to know' basis. (See Procedures for Data kept Electronically and on Paper, pages 2 and 3)

Procedure for Data kept electronically

	Data kept	Data Controller(s)	Data processor(s)/ Editor(s)	Who has Access	Where kept	Deletion process
1. Primary Waiting list	Name with home address, phone number(s), email. Notes eg Site preference, plots offered, correspondence.	Chair of RGS Waiting list secretary Site secretaries	Waiting list secretary	WLS, Site Secretaries, Chair of RGS, Membership Secretary, Treasurer	WLS's password protected device. Back copies kept in case an erroneous deletion occurs. Dropbox on password protected devices	Back copies kept on for 1 years on WLS's home computer then deleted. Only current Primary Waiting List on Dropbox
2. Applications for Waiting List emails	Name with home address, phone number(s), email.	Chair of RGS Waiting list secretary Site secretaries	Website Manager Waiting list secretary	Chair of RGS Website Manager Waiting list secretary	Website RGS email account	Deleted after 1 year from the Website by the Website Manager Deleted after 4 years by the Waiting List Secretary
3. RGS Membership list of plot holders	Name with home address, phone number(s), email, month and year of birth. Payment data	Chair of RGS Membership sec. Site secretaries	Membership Secretary	Site Secretaries, Chair of RGS, Membership Secretary, Treasurer.	password protected devices Dropbox on password protected devices	Back copies kept for 1 year on Membership Secretary's password protected devices then deleted. Only current Membership List on Dropbox
4. RGS Associate membership non-plot holder	Name with home address, phone number(s), email,	Chair of RGS Membership sec.	Membership Secretary	Site Secretaries, Chair of RGS, Membership Secretary, Treasurer.	password protected devices Dropbox on password protected devices	Back copies kept for 1 year on Membership Secretary's password protected devices then deleted. Only current Membership List on Dropbox
5. Communications /records re problems on plots and/or plot holder	Letters/emails /summaries of contacts re problem plots	Site secretaries. Site Manager	Site Secretaries	Site Secretaries, Chair of RGS Membership Secretary	password protected devices Dropbox on password protected devices	If no longer have a plot or no longer a member of RGS, keep for 1 year then delete unless on Secondary waiting list when communications are kept for 10 years then deleted when deleted from Secondary waiting list.

6. Email distribution list	Name, email	Chair of RGS IT manager	Chair of RGS Bulletin Editor IT manager	Chair of RGS IT manager	password protected devices	Deleted when no longer RGS member.
7. Communication with neighbouring householders	Emails, Letters	Chair of RGS Site secretaries	Chair of RGS Site secretaries	Chair of RGS Site secretaries Site Manager	password protected devices	Deleted when dispute is resolved

Procedure for Data kept on paper

	Data kept	Who is the data controller?	Who is the data processor/ Editor of these data	Who has Access	Where kept	Deletion process
5. Tenancy agreements	Name, address, email, phone number(s) month and year of birth	Chair of RGS Site secretaries	Site secretaries	Site secretaries, Chair of RGS	Kept In relevant file locked in cabinet in the Store. Keys held by Site Secretaries and Chair.	Shredded by site secretary after the tenancy is terminated.
6. Paper Application to be added to Waiting List	Name, address, email, phone number(s)	Chair of RGS Waiting list secretary	Waiting list Secretary	Waiting list Secretary, Chair of RGS, Store duty volunteers.	In folder in the Store which is locked when unattended. Collected as soon as possible by WLS / Chair of RGS. Keys to store held only by committee members.	Shredded when contact details confirmed and successful contact is made.
7. Paper Application to become member of RGS	Name, address, email, phone number(s)	Chair of RGS	Membership Secretary	Chair of RGS, Membership secretary	In folder in the Store which is locked when unattended. Collected as soon as possible by Chair of RGS. Keys to store held only by committee members.	Shredded when email sent to Membership Secretary.

Process to inform members how their data is kept and used:

Above Policy and Procedure to be kept on RGS website. Reference/ Link to the Policy given on:

- a. RGS membership form
- b. Waiting list request form
- c. Ask for explicit consent when replying to request by email to go on Waiting list. Link to Privacy Policy on RGS website.
- d. Tenancy agreement form

Audit Process:

A GDPR Auditor will be appointed who is a member of the RGS but who is not listed as being involved in the above procedures. An annual review and audit will take place led by the GDPR Auditor.

Definitions:

The data controller – who chooses the purpose of data processing:

A data processor – who chooses the manner of processing:

Data - Person's Name with any of the following: home address, phone number, mobile number, email address, payment data, date of birth. Letters/ emails re problems on plot or neighbours. This information may be kept electronically or on paper.