



RGS PRIVACY POLICY

Background: This policy aims to ensure that the Roehampton Garden Society (RGS) is compliant with UK data protection law. The General Data Protection Regulation (GDPR) was implemented by the EU to make sure that personal data is used properly and fairly, and was written into UK law through the Data Protection Act 2018 (DPA). Following Brexit, the GDPR has been retained in UK law as the UK GDPR, and is to be read alongside the DPA. Any reference below to “UK DP law” is to UK law relating to data protection, taken as a whole.

Key points in UK DP law:

1. The RGS must identify:
 - Data controller – Chair of the RGS (acting in consultation with other relevant officer(s) of the RGS).
 - a Data processor – any person who processes personal data on behalf of the RGS.
2. The RGS only processes personal data, not sensitive personal data (e.g. medical records, financial information).
3. Personal data must be used lawfully, fairly and transparently.
4. Since there is a contractual reason for holding their personal data, permission is not needed from members or anyone on a waiting list. However, permission is always obtained from members and waiting list applicants in any event.
5. Personal data which is collected must be limited to information actually needed by the RGS. The use of personal data must be limited to specific purposes to enable the running of the RGS and allotments.
6. Personal data must be deleted if no longer needed. Members and those on a waiting list have a right to be forgotten.
7. Confidentiality must be sustained and personal data must be kept securely.
8. Breaches must be reported to the RGS within 72 hours. Depending on the circumstances relating to the breach, the RGS may then be obliged to report the breach to the ICO (Information Commissioner’s Office) within 72 hours of notification of the breach.
9. The RGS has an obligation to provide, within one calendar month, a copy of any personal data it holds, if requested by the person to whom that information relates.

RGS Data Protection Policy:

1. Any personal data collected will only be used by the RGS as is necessary for operational reasons.
2. Only Primary Waiting list will be shared with Enable (acting on behalf of Wandsworth Council) to pick up those on both RGS waiting list and Wandsworth waiting list. No personal 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. Personal data will be kept for the duration of any time on a waiting list and any time there is a current tenancy.
5. Personal data will be kept securely and only accessed on a ‘need to know’ basis. (See Procedures for Personal Data kept Electronically and on Paper below)

Procedure for Personal Data kept Electronically

	Personal Data kept	Data controller	Data processor(s)	Who has Access	Where kept/Access protection	Deletion process
1(a). Full Primary Waiting list	Name with home address, phone number(s), email. Notes (e.g. Site preference) and correspondence may include additional personal data.	Chair of RGS, acting in consultation with waiting list secretary (WLS) and site secretaries	WLS	WLS, Site Secretaries, Chair of RGS, Vice Chair Membership Secretary, Treasurer	Updated on WLS's password protected device. Back copies kept in case an erroneous deletion occurs. Accessible via Dropbox on password protected devices	Back copies kept on for 1 year on WLS's home computer then deleted Only current Primary Waiting list on Dropbox
1(b). Secondary Waiting list	First and Last name only	Chair of RGS, acting in consultation with WLS and site secretaries	WLS	WLS, Site Secretaries, Chair of RGS, Vice Chair, Membership Secretary, Treasurer	Updated on WLS's password protected device. Back copies kept in case an erroneous deletion occurs. Accessible via Dropbox on password protected devices	Names are deleted from the list after 10 years Only current Secondary Waiting list on Dropbox
2. Applications for Waiting List (emails)	Name with home address, phone number(s), email.	Chair of RGS, acting in consultation with WLS and site secretaries	Website Manager, WLS	Chair of RGS, Website Manager, WLS	Website RGS email account	Deleted after 1 year from the Website by the Website Manager Deleted after 4 years from RGS email account by WLS
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, acting in consultation with WLS, membership secretary and site secretaries	Membership Secretary	WLS, Site Secretaries, Chair of RGS, Vice Chair, Membership Secretary, Treasurer	Updated on password protected devices Accessible via 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, acting in consultation with membership secretary	Membership Secretary	WLS, Site Secretaries, Chair of RGS, Vice Chair, Membership Secretary, Treasurer.	Updated on password protected devices Accessible via Dropbox on password protected	Back copies kept for 1 year on Membership Secretary's password protected devices then deleted Only current Membership list on Dropbox

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5. Communications (e.g. letters and emails)/records (e.g. summaries of telephone calls) re problems on plots and/or plot holder	Name and home address, phone number(s), and/or email. May also include additional personal data (e.g. status of health).	Chair of RGS, acting in consultation with site secretaries and site manager	Site Secretaries	WLS, Site Secretaries, Chair of RGS, Vice Chair, Membership Secretary, Treasurer.	Communications dealt with on password protected devices Accessible via Dropbox on password protected devices	If no longer have a plot or no longer a member of RGS, kept for 1 year then deleted. Stage letters deleted after 3 years
6. Email distribution list	Name, email	Chair of RGS, acting in consultation with communications manager	Chair of RGS, Bulletin Editor, Communications manager	Chair of RGS, Communications manager	Maintained on password protected devices	Deleted when no longer RGS member.
7. Communication with neighbouring householders	May include Name and email Home address, and/or phone number. May also include additional personal data.	Chair of RGS, acting in consultation with site secretaries	Chair of RGS, Site secretaries	Chair of RGS, Site secretaries, Site Manager	Communications dealt with on password protected devices	Deleted when dispute is resolved

Procedure for Personal Data kept on Paper

	Personal Data kept	Data controller	Data processor(s)	Who has Access	Where kept/Access protection	Deletion process
8. Tenancy agreements	Name, address, email, phone number(s), month and year of birth	Chair of RGS, acting in consultation with 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
9. Paper Application to be added to Waiting list	Name, address, email, phone number(s)	Chair of RGS, acting in consultation with WLS	WLS	WLS, Chair of RGS, Store duty volunteers, Communications manager.	In folder in the Store which is locked when unattended. Collected as soon as possible by WLS / Chair of RGS. Code to store held only by store volunteers, site secretaries and some Committee members	Shredded when contact details confirmed and successful contact is made
10. Paper Application to become member of RGS	Name, address, email, phone number(s)	Chair of RGS	Membership Secretary	Chair of RGS, Store Duty Volunteers Communication Manager	In folder in the Store which is locked when unattended. Collected as soon as possible by Chair of RGS. Code to store held only by store volunteers, site secretaries and some Committee members	Shredded when email sent to Membership Secretary

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

Policy published on RGS website. Reference/ Link to the Policy given on:

- a. RGS membership form
- b. Waiting list request form
- c. Email replying to request to go on Waiting list. (Also ask for explicit consent.)
- d. Tenancy agreement form

DP Review Process:

Members are asked annually to check personal details, and to provide any updates.

A DP reviewer will be appointed who is a member of the RGS but who is not listed as being involved in the above procedures.

A periodic review of the application of this policy in practice will take place led by the DP reviewer.

Definitions:

Data controller – person who has responsibility for choosing the purposes and method of data processing (including protecting personal data from harm);

Data processing – taking any action with regard to someone's personal data;

Data processor – any person who processes personal data on behalf of a Data Controller;

Personal data – personal information relating to an individual, where that individual is identified or could be identified directly or indirectly from one or more pieces of information specific to the individual. Examples include: Person's name and any of the following: home address, phone number, mobile number, email address, payment data, date of birth. This information may be kept electronically or on paper.