Umbrella Sussex

Supporting the Sharing Economy in Hastings and Rother

Data Protection Policy

Opening Statement

Umbrella Sussex is a collective of non constituted wealth sharing projects who work together to support and maintain sharing economy projects for the benefit of the communities of Hastings and Rother.

Sharing Economies focus on building community wealth and working cooperatively to overcome problems caused by poverty, or lack of access to things. In the sharing economy emphasis is on fair access to things rather than owning things. Sharing economy projects try to avoid transactional relationships, and obligations are social rather than financial.

At present, Umbrella Sussex is formed of its 2 founding projects, Make and Mend Bexhill and Beyond, and Hastings Library of Things.

Umbrella Sussex is a community interest company, with an asset lock, which operates on cooperative principles to support community sharing projects.

We recognise that even as an informal and member led group we have responsibilities towards members, visitors and volunteers and that they will develop over time. This document lays out the main areas we have considered, what we will do and what expect of library members, volunteers, visitors, stakeholders and partners.

Umbrella Sussex aims to appoint a volunteer with specific responsibility for Data Protection, including arranging briefings and training and for keeping the policy up to date.

Volunteers, members and visitors should be proactive in raising any concerns they have by emailing info@umbrellasussex.org.uk

The Data Protection policy will be reviewed at least every 2 years

1st review: June 2024

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Some Definitions:

- Data is: Information which can identify a person. Data can include your name, email address, and telephone number.
- Sensitive Data is: Information that is a bit more private, such as your bank details or whether you have a disability or not.
- A Data Subject is: The person who the data is about.
- Data processing is: People who process data are known as data processors. Examples are librarians who answer your email, take your phone call or set up your membership.
- Subject Access Request: Data subjects can ask what data we hold about them, and ask us to correct it if we have made a mistake.

Need for a Data Protection Policy

In formal terms, Umbrella Sussex processes the personal data of data subjects.

This means we use and store information that can identify a person, (the data subject)

It's a responsibility to look after peoples data and treat it with respect so we have a policy for everyone to understand how we look after and process personal data.

All the personal data that Hastings Library of Things gathers is handled and dealt with in accordance with UK GDPR (General Data Protection Regulation).

Current Projects: Hastings Library of Things and Make and Mend, Bexhill and Beyond. A Community interest company: Company Number: 14001035
info@umbrellasussex.org.uk

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When and How we process- what you should know

- We only process the data that we need to run our project
- We make sure data processing is done by people who are trained to look after your data and who understand the UK GDPR rules.
- Data subjects may ask us about how we use their data at any time and can ask for access to it to be restricted.

Sharing:

Information we are legally required to collect.

Umbrella Sussex will not usually share your information unless you have agreed we can but there are exceptions:

We may be required by law to collect and use certain information in order to comply with the requirements of central government. For example, we have to do a 'right to work' check for any employees. Usually this means keeping a copy of a employee's passport or equivalent document on file.

In rare circumstances we may need to give information to the police. There are strict rules about what and when the police can ask for data and the Library of Things will only give information we are legally required to give.

If you are incapacitated by injury we have the right to contact emergency services and share facts we know about you to help you get treatment, unless you have been clear we maynot. (for example, we might tell a paramedic you take epilepsy medication)

There are safeguarding rules about reporting to social services- see the safeguarding policy for more information

Data Protection Principles

Hastings Library of Things follow the Principles of Data Protection, which are:

1.Personal data must be fairly and lawfully processed.

Lawful Purpose

UK GDPR offers reasons why an organisation can process data. Hastings Library of Things will make a decision about what lawful purpose we have for processing data for each data subject or set of data we hold.

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Example of lawful purpose: If you email us and ask us to let you know if we have any jobs coming up, we will say you have consented to let us keep your information.

2.Personal data must be processed for specified limited purposes.

3.Personal data must be adequate, relevant and not excessive.

4.Personal data must be accurate and up to date.

5.Personal data must not be held for longer than is necessary.

6.Personal data must be processed in line with the data subject's rights.

7.Personal data must be secure.

Keeping Data Secure

In order to protect data from unauthorised use, loss or unlawful disclosure Umbrella Sussex will:

- Keep paper files and other records or documents containing personal / sensitive data are kept in a secure environment such as a locked filing cabinet.
- Ensure personal data held on computers and computer systems, including "cloud" systems is protected by secure passwords and/or encryption.
- Restrict access to member data bases to trained volunteers who have signed our volunteer handbook (incorporating a data protection agreement)
- Computers and devices will be locked when not in use.
- Individual passwords are such that they are not easily compromised.
- Data sent by email is protected by using secure servers, and encrypted or password protected documents, as appropriate.

8.Personal data must not be transferred to other countries without adequate protection.

Data processing in other countries: We may use tools including Dropbox, Mailchimp and Zoom which are based in other countries. We make sure that we only use reputable organisations which have satisfied us that they have strong data protection policies and processes in place.

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Data Subjects Rights:

Umbrella Sussex make sure all our data processors know what your rights are.

(data processors are people who process data – for example a volunteer librarian will need access to the library data base to book "things" in and out for members.)

Data subject rights are:

1.The right to be informed that processing is being undertaken.

2.The right of access to one's personal data and have a free copy of the data held.

1.The right to prevent processing (in certain circumstances).

2.The right to correct, rectify, block or erase inaccurate information without undue delay.

Preventing processing and correcting mistakes

Data subjects have the right to prevent processing in some cases. Usually, it is if you consented to our processing your information and then you change your mind or want to restrict your permission. For example, you might decide you don't want to get email newsletters and ask us to stop sending them, which we will do. You cannot ask us to delete all of your membership details while you are still a member though, so it is a limited right.

3.The right to be forgotten (in certain circumstances)

Being Forgotten

If our reason for processing your data is consent, you can ask us to stop, and ask us to delete your details. The right to be forgotten is a limited right. For example, we might keep your details on file for a while after you stop being a member, in case you come back to us with a question or complaint.

Data Processing Standards

- We make no presumption of automatic consent across data gathering platforms.

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- Queries about handling personal data will be promptly and courteously dealt with.
- Methods of handling personal data will be regularly assessed and evaluated.
- Data sharing with third party organisations is limited to that necessary by the third-party organisation in the carrying out of its functions.
- We have made appropriate enquiries with third party organisations that they handle personal data in line with UK GDPR.
- All Umbrella Sussex volunteers will be made aware of the data protection policy and offered training to make sure they understand their duties and responsibilities to people's data.
- Children: If we do run projects with children, we will make sure that they and/or their caregiver understand their rights under UK GDPR.

Data processing Table

Type of processing	Who sees your data	Changing your mind
Managing your Hastings library of things membership number, email address and reservation records	Several librarians could have access to your phone membership details	You can cancel your membership, but we might keep some of your
We may email newsletters to members and supporters	Trained volunteers who have accepted our GDPR standards	You can opt out of newsletters if you want to
We sometimes work with other organisations to deliver a specific project, for employing a local freelancer to organise an event	Trusted freelancers and organisations could be given access to your phone number, email address. They have to promise not to keep your data or use it for other things unless you tell them they can	You can tell us if you don't want us the share with other organisations
~~If you want to use the~~ Delivery and Collection service	~~We will give your name,~~ address, phone number and email address to the delivery	~~You can ask them not to~~ send you newsletters, but they might keep your details

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direct to arrange the service with you	and collection service if you ask to use it	for a while in case you have a query or want to use them in the future

Data Processing for the Disclosure and Barring Service

Umbrella Sussex may, on occasion, require staff and volunteers to undergo a DBS check in relation to specific planned work with children and or vulnerable adults.

Umbrella Sussex will comply with its obligations under the General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

Any DBS Certificate information is kept securely, using an accredited online service with access strictly controlled and limited to those who are entitled to see it as part of their duties. Should paper DBS certificates be obtained, they will be stored in lockable, non-portable, storage containers with access limited to named staff.

In accordance with section 124 of the Police Act 1997, DBS certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access apply.

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

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Registration with the Information Commissioners Office (ICO)

Umbrella Sussex is not required to register with the ICO. We will review this decision every year when we review our data protection policy.

Help and Advice

We encourage data subjects to ask us questions about our policy and their data.

There are organisations who can give you advice and information about GDPR, for example, Citizens Advice England and the Information Commissioners Office

Data Protection Officer

Umbrella Sussex is not required to appoint a Data Protection Officer but has appointed a data protection contact for any data protection matters large or small. This includes actual or suspected data breaches and subject access requests.

The data protection contact is Shelley Feldman- shelley@umbrellasussex.org.uk