

# DATA PROTECTION POLICY TEMPLATE

## Overview and How to Use This Template

This document provides a template Data Protection Policy for unincorporated groups, mutual aid groups, and community projects.

### Why do you need this policy?

While your group may be unincorporated, small or run entirely by volunteers, if you collect personal information, such as names, phone numbers, or email addresses (e.g., for a newsletter, WhatsApp group, or grant application) you are legally considered a "Data Controller" under the UK GDPR. This means that even if you are unincorporated, since it is you who decides what to do with the collected data, you have a legal responsibility to keep that data safe.

- **The Risk:** If you lose data (e.g., a laptop is stolen or an email is sent to the wrong person), you could harm your members and face fines.
- **The Solution:** A simple policy shows you are responsible and helps you get funding.

### Key Roles

- **Data Controller:** This is your group as a whole. You decide why you have the data.
- **Data Protection Lead:** You likely don't need a formal "Data Protection Officer" (DPO). Instead, appoint one person (e.g., the Secretary) as the Data Protection Lead.

### The "Golden Rules" (Lawful Basis)

You cannot keep data just "because it might be useful". You need a legal reason. For community groups, the most common ones are:

- **Consent:** They said yes (e.g., ticking a box for a newsletter).
- **Legitimate Interest:** You need it to run the group (e.g., keeping a list of volunteers/members so you can email them key information, like a rota).
- **Contract:** You have a formal agreement (e.g., paying a freelancer).

### Practical Security Steps

- **BCC is your friend:** Never reveal everyone's email address in a mass email. Use BCC.

- **Passwords:** Don't share the password for the group email or other accounts. If you need to share, use a password manager like Google Password Manager, Apple Password Manager, Dashlane etc., if possible.
- **Paper:** If you collect paper sign-up sheets, don't leave them on a table. Lock them up or scan and shred them.

### How to use this template

This document is a template. It is designed to be adapted to fit your specific group.

- **Read it carefully:** Ensure you understand the commitments you are making.
- **Fill in the blanks:** Look for the text in **[Square Brackets]**. You need to replace this with your group's specific details (e.g., your Group Name, who is responsible for data, and how you store it).
- **Adopt it:** Once updated, your decision-making group (e.g. Committee or Core Group) should formally approve the policy and record this in your meeting minutes.

### Further Guidance and Resources

Data protection can feel complex, but there is excellent support available for community groups. Below are trusted resources that provide plain-English guidance for unincorporated groups.

#### The Resource Centre

The Resource Centre provides some of the best guidance in the UK specifically designed for small volunteer-run groups.

- [Data Protection for Community Groups](#): A comprehensive guide on the basics.

#### The Information Commissioner's Office (ICO)

The ICO is the UK's independent regulator for data rights. They have a specific hub for small organisations and charities.

- [SME Web Hub](#): Advice for small organisations.

#### NCVO (National Council for Voluntary Organisations)

The NCVO offers guidance on how data protection interacts with safeguarding and managing volunteers.

- [GDPR and Data Protection Law](#): A comprehensive guide to understanding Data Protection and how to write the policy

### **The Social Change Nest**

Our own Data Protection Policy and Privacy Notices, outlining how we prioritise data safety and retention in all our services and activities .

- [Data Protection Policy](#)
- [Privacy Notice](#)

### **Any questions?**

If you are unsure about your responsibilities as a group hosted by SCN, or if you experience a significant data breach that might affect SCN, please contact us.

- **General Enquiries:** [hello@thesocialchangenest.org](mailto:hello@thesocialchangenest.org)
- **Reporting Breaches:** [reporting@thesocialchangenest.org](mailto:reporting@thesocialchangenest.org)

*(Note: While SCN can provide guidance, the ultimate legal responsibility for data protection lies with your group as the Data Controller.)*

# [TEMPLATE] Data protection Policy

## 1. Introduction

[Group Name] is committed to processing data lawfully, fairly, and transparently. We acknowledge our obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines how we gather, use, and protect personal information about individuals (members, volunteers, beneficiaries) to carry out our work.

## 2. Scope

This policy applies to all members, volunteers, and any other individuals working on behalf of [Group Name]. It covers all data processed by the group, whether stored electronically (emails, spreadsheets, databases) or on paper.

## 3. Key Roles and Responsibilities

- **The Group (Data Controller):** The collective group responsible for determining why and how data is used. They ensure the group complies with data protection law.
- **Data Protection Lead:** A nominated individual (e.g., The Secretary) responsible for:
  - Handling questions about data protection.
  - Updating this policy and renewing any necessary registrations (e.g., with the ICO).
  - Responding to requests from individuals (Subject Access Requests).
- **Volunteers/Members:** Responsible for handling data securely in accordance with this policy (e.g., not sharing passwords, keeping lists secure).

## 4. Lawful Basis for Processing

We only process personal data when we have a lawful basis to do so. For [Group Name], the most common bases are:

- **Consent:** The individual has given clear permission (e.g., ticking a box to receive a newsletter).
- **Legitimate Interest:** We need the data to run the group effectively (e.g., keeping a list of current volunteers to organise a rota).

- **Contract:** We need the data to fulfil an agreement (e.g., paying a freelancer or processing a grant).
- **Legal Obligation:** We are required by law to keep records (e.g., keeping financial records for tax purposes).

## 5. Data Collection and Usage

We adhere to the principle of "Data Minimisation" - we only collect what is necessary.

- **Member/Volunteer Data:** Name, contact details, emergency contact info. *Used for: Administration and safety.*
- **Beneficiary Data:** Names, addresses, specific needs. *Used for: Delivering support or services.*
- **Financial Data:** Bank details. *Used for: Paying expenses or grants.*
- **Photos/ Videos.** *Used for: Publicity- Only with consent.*

## 6. Data Security

[Group Name] takes the security of personal data seriously.

- **Digital Storage:** Data is stored on secure, password-protected platforms (e.g., Google Drive, encrypted laptops). Passwords are never shared between volunteers/members.
- **Physical Storage:** Paper records (e.g., consent forms, sign-up sheets) are kept in a locked location and digitised or shredded as soon as possible.
- **Access Control:** Access to personal data is restricted to those who specifically need it for their role. When a volunteer/member leaves, their access is revoked immediately.

## 7. Data Retention

We do not keep data longer than necessary. Our retention periods are:

- **General Correspondence/Emails:** Deleted after [e.g., 2 years].
- **Volunteer/Member Lists:** Deleted/Archived when the individual leaves the group.
- **Financial Records:** Retained for **7 years** to comply with tax legislation and grant requirements (aligning with The Social Change Nest's audit requirements).

## 8. Data Sharing

We do not sell personal data. We only share data if:

- **Required by Law:** (e.g., with HMRC or the Police).
- **Required by a Funder/Host:** We may share data with The Social Change Nest CIC for auditing, grant reporting, or compliance purposes. We will inform individuals of this transparency relationship.

## 9. Individual Rights

Under the UK GDPR, individuals have the right to:

- **Access:** Ask for a copy of the data we hold on them (Subject Access Request). We will provide this within one month.
- **Rectification:** Ask us to correct wrong data.
- **Erasure:** Ask us to delete their data (unless we have a legal reason to keep it, e.g., financial records).
- **Objection:** Object to us processing their data (e.g., for marketing).

## 10. Data Breaches and Mistakes

**10.1 Definition** A "data breach" is any unauthorised access, loss, or disclosure of personal data (e.g., sending an email to the wrong person, losing a laptop, or leaving a folder on a train).

**10.2 What to do if you make a mistake** We know that mistakes happen. If you accidentally share data with the wrong person, please do not hide it. The most important thing is to act quickly to contain the mistake.

- **Wrong Recipient:** If you send an email to the wrong person, ask them immediately to delete it and confirm when they have done so.
- **Lost Items:** Retrace your steps immediately.

### 10.3 Reporting Procedure

- **Report it:** Inform the Data Protection Lead immediately.
  - *Note:* Reporting a mistake does not mean you are in trouble. It ensures we can log it internally and protect the group legally. Hiding a breach is far more serious than the breach itself.
- **Action:** The Lead will investigate and contain the breach.
- **ICO Reporting:** If the risk to individuals is high (e.g., medical data or passwords stolen), the Lead is legally required to report it to the Information Commissioner's

Office (ICO) within 72 hours. *Minor breaches (like a single wrong email) usually do not need to be reported to the ICO, provided they are logged internally.*

## **11. Review and Monitoring**

This policy will be reviewed [Annually/Biennially] by the Committee to ensure it remains up to date with the law and the group's activities.

**Signed:**

[Group Organiser's Name]

[Position/Role]

[Date]

## Privacy Notice Template (External)

*For your website or sign-up forms. This is shorter and tells the public what you do.*

# PRIVACY NOTICE [Group Name]

**Who we are:** [Group Name] is a community group based in [Location]. **Contact us:** [Email Address]

**1. The data we collect** We collect personal information such as names, email addresses, and phone numbers and photographs when you [e.g., join our mailing list, attend an event, or volunteer with us].

### 2. Why we collect it

- To send you updates about our activities (with your consent).
- To organise events and coordinate volunteers (legitimate interest).
- To process expenses or payments (contract/legal obligation).

**3. How we store your data** Your data is stored securely on [e.g., our secure cloud storage]. It is accessed only by authorised volunteers. We will keep your data for as long as you are involved with the group, or until you ask us to remove it. Financial records are kept for 7 years.

**4. Sharing your data** We do not sell your data. We may share anonymised data with funders (like The Social Change Nest) to show the impact of our work.

**5. Your rights** You have the right to ask for a copy of your data, correct it, or ask us to delete it. To do so, please email [Email Address].

**6. Complaints** If you are unhappy with how we use your data, please talk to us first. You also have the right to complain to the Information Commissioner's Office (ICO).