

## St Andrew's and GDPR Compliance

- A **Data Protection Policy** has been formulated, agreed, placed on the website and its presence notified to all members and facility users.
- The **Data Protection Officer** is named and is responsible for GDPR compliance
- A **Data Privacy Statement** has been issued to all members defining "personal data".
  - The Data Controller is named
  - The elements of processing of personal data and its legal basis are described
  - The restrictions on sharing of personal data are described
  - Specific times for the retention of different types of data are described
  - Individual rights in relation to personal data are described
  - An undertaking is given that any extension of data processing will be notified with appropriate descriptions
  - Contact details of the person to whom queries or complaints should be directed are provided, together with contact details of the ICO
- **Consent forms** have been circulated to all members and staff, completed and held on file until renewal is sought one year later. These consent forms define personal data and describe the purposes to which it will be put, as described in the Privacy Statement.
- **Training courses** have been provided with dates and names of attendees recorded. Emphasis has been placed on the definitions of a data breach and the responsibility of all members and staff for security and the immediate reporting of any suspected breach. This will be investigated by the Data Protection Officer who will decide whether it requires reporting to the ICO. Review of the events will lead to attempts to prevent future similar events.
- An **information audit** has been carried out.
- Financial processes have been reviewed and compliance with GDPR principles determined.
  - Data accuracy and security have been established and pseudonymisation effected.
  - Encryption of data has been enacted. The Treasurer produces the financial reports, tracking their production and dissemination and disposal when no longer required.
- A **Data Protection Impact Assessment** has been deemed unnecessary
- GDPR and financial data are significant elements in the **Risk Management Register**, specific times for review are designated and persons responsible for the data collection defined.
- As CCTV is used throughout the building for monitoring of criminal behaviour and failure to comply with Conditions of Hire, St Andrew's has been registered with the ICO.

