



# Data Protection Policy

Revised to comply with General Data Protection Regulation (GDPR)  
and Data Protection Act 2018

## INTRODUCTION

The General Data Protection Regulation (GDPR) is a European-wide law that, together with Data Protection Act 2018, replaces the Data Protection Act 1998 in the UK, effective from 25 May 2018. It places greater obligations on how organisations handle personal data. GDPR is a legal regulation designed to protect personal data stored on computers or in an organised paper filing system. It controls the way information is handled and gives legal rights to people who have information stored about them.

Any organisation or person who needs to store personal information must apply to register with the Information Commissioner. At the time of adoption of this policy, OutStories Bristol is in the process of seeking registration (£40).

## POLICY

OutStories Bristol will seek to comply with the GDPR 2018 and subsequent regulation in all its endeavours.

*OutStories will fulfil the registration requirements of the Information Commissioner's Office (£40).*

OutStories Bristol must, under the General Data Protection Regulation 2018 (GDPR):

- Use personal information fairly and lawfully
- Collect only the information necessary for a specific purpose
- Ensure it is relevant, accurate and up to date
- Only hold as much as required for as long as it is required
- Allow the subject of the information to see it on request
- Keep it secure

OutStories Bristol will only hold data required to carry out the objects of the Association.

OutStories Bristol will not share, pass, sell or exchange personal data to any other individual, organisation, publication or media channel except:

- under conditions set by the data subject (i.e. the person the information refers to) in a signed Information Sharing Agreement, or
- on presentation of a valid UK Court Order or police warrant.

OutStories Bristol will include a standard GDPR Statement in its literature that includes forms to collect personal data. The wording of the statement to be used is:

### ***General Data Protection Regulation /Data Protection Act 2018***

***OutStories Bristol will only use personal data to carry out the objects of the Association and will only make such data available to another organisation or individual with the consent of the person(s) concerned in an Information Sharing Agreement.***

OutStories Bristol will maintain a procedure for individuals who wish to verify what personal data it holds about them. No charge will be levied for this, except for verification that would require a high level of administrative effort, such as verification of past archives or emails.

Personal and sensitive personal data held by OutStories Bristol on its computers and in manual files will include:

- Name, address, e-mail and telephone
- Age or date of birth
- Nationality and ethnic origin
- Gender identity
- Sexual orientation.

## **PROCEDURE**

### **Control of data protection procedures**

Data protection policy and practice must be monitored by the Secretary and at least one Trustee, who will deal with relevant queries.

1. All personal and sensitive personal data will be secured against unauthorised access:
  - Password protection of relevant drives
  - Paper document held securely
2. OutStories Bristol will ensure that:
  - IT network security prevents unauthorised access
  - Website and email client are behind a firewall
  - Individual PCs used for OSB activity are password protected
  - Files containing personal data are locked away securely
  - Only authorised individuals can access sensitive data
3. **Security of Members' Data:** the Membership Database is password-protected and only trustees have access.
4. **Passwords** are not disclosed, written down, emailed, given over the telephone, by text or discussed with a third party.
5. **Trustees** accessing a document subject to this policy will do so using their own computer by temporarily copying the file then removing it when the job is complete.

6. **Volunteers** will not have access to the Membership database except when helping with distribution by post, email, etc. In this case they will receive induction training in:
  - Applying this policy and the associated procedures
  - Signing of the relevant information-sharing agreement
7. OutStories Bristol must make sure the data subject knows why data about them is collected, how it will be used and its relevance to its work.
8. OutStories Bristol's GDPR Statement must be included in relevant forms, printed or electronic, and in written requests by post or email.
9. The data subject's consent should be obtained prior to using their data, especially if it is 'sensitive' data – see 'Guidance' below.
10. Data that enables an individual to be identified must never be given to anyone outside OutStories Bristol without their written consent.
11. Emailed messages for broadcasting must always place the distribution addresses in the blind copy field (Bcc) of the message.
12. Trustees should review and renew data security measures by:
  - Changing secure passwords on PCs and databases frequently;
  - Locking paper files and logging off PCs when away from desks;
  - Collecting papers promptly from printers and photocopiers.
13. Data must be accurate and there must be good reason for using it.
14. Data must only be used for the purpose for which it was originally obtained. It must not be used for direct marketing or fundraising without the data subjects' written permission.
15. The Osbox Administrator shall be responsible for managing user access to Osbox by:
  - Ensuring each new user signs the Osbox Acceptable Use Agreement before being given access;
  - Investigating suspected misuse in accordance with the Osbox Misuse Guide;
  - Controlling bucket access privileges;
  - Denying user access to buckets containing confidential or sensitive information except on a 'need to know' basis;
  - Periodically reviewing access permissions and revoking access to volunteers who have lapsed.

## Record of Processing Activities

### Personal data held by OutStories Bristol

#### Membership list:

<i>Data held</i>	name, postal address, email address, telephone numbers
<i>Where data came from</i>	membership application form (paper or website) completed by member
<i>How/where data stored</i>	electronic file in Osbox
<i>Who shared with</i>	none.

#### Email list for general mailings to supporters:

<i>Data held</i>	name, email address
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<i>Where data came from</i>	proforma completed by supporter or email request
<i>How/where data stored</i>	OutStories Bristol's e-mail account supplied by Google
<i>Who shared with</i>	none

**OutStories Bristol website users:**

<i>Data held</i>	name, username, email address
<i>Where data came from</i>	registration form in website, completed by user or Web Administrator
<i>How/where data stored</i>	OutStories Bristol website
<i>Who shared with</i>	none

**'Osbox' cloud store users:**

<i>Data held</i>	name, log-in name, email address
<i>Where data came from</i>	paper form completed by user
<i>How/where data stored</i>	paper form retained by Osbox Administrator; electronic copy stored in Osbox
<i>Who shared with</i>	none

**Volunteer expenses claim forms:**

<i>Data held</i>	name, email address, telephone, bank account details
<i>Where data came from</i>	expenses claim form (paper or electronic) completed by claimant
<i>How/where data stored</i>	Osbox
<i>Who shared with</i>	none

**Oral history recordings, personal stories by any medium:**

<i>Data held</i>	name, postal address, email address, telephone
<i>Where data came from</i>	given by person; permitted usage expressly given by contributor by completion of a Consent Form
<i>How/where data stored</i>	Osbox
<i>Who shared with</i>	Bristol Museum Service, Bristol City Council or other public archive with express permission of the contributor

**Privacy notices on forms**

See POLICY above.

## GUIDANCE

**Data** is information which is recorded with the intention that it should be processed on computer or is recorded as part of a relevant filing system (i.e. manual system). There are two categories of data:

1. **Personal data:** information relating to a living individual who can be identified
  - from the data itself
  - from data that includes an expression of opinion about the individual.
2. **Sensitive personal data:** information relating to the data subject's:

- Racial or ethnic origins, political opinions or affiliations, religious or spiritual beliefs, trade union membership;
- Physical or mental health, sexual orientation, gender identity;
- Commission, alleged commission, legal proceedings, spent or unspent convictions for any offence committed or alleged to have been committed by the data subject;
- Information of a personal or anecdotal nature surrounding an individual's personal or family history, connections, affiliations or involvement in specific events.

## **Trustees' data protection checklist**

### **Existing data:**

1. Are we currently holding personal data?
2. Is it held securely?
3. For what purpose are we holding it?
4. Is it sensitive personal data?
5. Does the individual know we are holding their personal data? Have they given their consent?
6. Is the data accurate?
7. Does the data still need to be held?

### **Use of data held:**

1. Are you passing personal data to anyone else? Inside OutStories Bristol? Outside OutStories Bristol?
2. Are we using blind copies to email to distribution lists?
3. Is there a confidentiality agreement in place where it is necessary to pass data to a permitted third party?

### **Collection of new data:**

1. Where appropriate, OutStories Bristol's standard Data Protection Statement should be included in any form or communication, together with a relevant opt out for further communications.
2. When collecting data from new contacts by phone, email, or letter they should be read the data protection and email statements.
3. Data should be deleted when it is no longer required.
4. No personal data should be requested, obtained or accepted from another organisation without the consent of the individual/s concerned.
5. Do not pass personal data to any person outside the staff of OutStories Bristol without the permission of the individual to whom the data relates. If you receive a request from someone to put you in contact with a third party, ask for their contact details instead and offer to forward them on to the intended contact, asking that they get in touch.

## Policy adopted by the trustees:

Signed: ..... Name: Cheryl Morgan

Position: Co-Chair Date: 24/09/2019

Signed: ..... Name: Charlie Beaton

Position: Secretary Date: 24/09/2019

## APPENDICES

OutStories Bristol [Membership Registration Form](#)

OutStories Bristol [E-mail Sign-up Sheet](#)

Oral History [Consent and Copyright Form](#)

Oral History [Interviewer's Registration Form](#)

Osbox access:

- [Osbox Administrator protocols](#)
- [Osbox Acceptable Use Agreement](#)
- [Osbox Misuse Guide](#)