

## Granville Community Kitchen Data Protection and Handling Policy

### **Policy Statement**

Granville Community Kitchen (GCK) collects and uses information about people with whom it communicates and provides services. This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material. GCK handles personal information of staff, volunteers, board members, members and service users. This policy applies to UK residents' personal data and anyone in GCK who processes that information.

GCK regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain confidence between those with whom it deals.

GCK fully endorses and adheres to the principles of data protection and handling as set out in the DPA 2018 and UK GDPR.

The purpose of this Policy is to ensure that all staff, board members and volunteers are clear about the purpose and principles of data protection and to ensure that it has guidelines and procedures in place that are consistently followed.

Failure to adhere to the DPA 2018 and UK GDPR is unlawful and could result in legal action being taken against GCK or its staff, board members or volunteers.

### **Principles:**

GCK is committed to correctly handling and processing the personal information of individuals. This includes the way information is obtained, held, used and disclosed and covers computerised records as well as any manual filing systems and card indexes.

Information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this GCK follows the following principles as laid out in the GDPR:

- Personal data will be **processed fairly, lawfully and transparently**
- Data will only be collected and **used for specific, explicit and legitimate purposes**
- Further processing or storing of data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), be considered to be compatible with the initial purposes
- Data will be **adequate, relevant and limited** to what is necessary in relation to the purposes for which they are processed.
- Data will be **accurate and, where necessary, up to date**
- Data will not be held any longer than is necessary, and anonymised after this point
- Data will be **kept safe from unauthorised access, accidental loss or damage**
- Data subject's rights will be respected

## Data subject rights

Under the GDPR, any individuals that GCK holds personal data for have the right:

- **to be informed** - of what data GCK collects, how it is used, how long it will be kept and whether it will be shared with any third parties
- **of access** - upon request, GCK will provide a copy of any personal data they hold concerning the requesting individual within a month.
- **to rectification** - An individual can request that any information held about them that is inaccurate or incomplete be updated. GCK will do this within a month.
- **to erasure** - An individual can request that GCK erases their data in certain circumstances, such as when the data is no longer necessary, the data was unlawfully processed or it no longer meets the lawful ground for which it was collected.
- **to restrict processing** - An individual can request that GCK limits the way it uses their personal data.
- **to data portability** - An individual is permitted to obtain and reuse their personal data for their own purposes across different services. This right only applies to personal data that an individual has provided to data controllers by way of a contract or consent.
- **to object** - An individual can object to the processing of personal data that is collected on the grounds of legitimate interests or the performance of a task in the interest/exercise of official authority. Organisations must stop processing information unless they can demonstrate compelling legitimate grounds for the processing that overrides the interests, rights and freedoms of the individual or if the processing is for the establishment or exercise of defence of legal claims.
- **Rights related to automated decision making including profiling**

GCK will ensure that the above subject rights will be met.

## Responsibilities and compliance

During the course of their duties with GCK, staff, volunteers and board members will be dealing with personal information (such as names/addresses/phone numbers/email addresses) of members, staff, service users, board members and volunteers. The DPA (2018) and UK GDPR give specific guidance on how this information should be dealt with. Staff, volunteers, and directors must abide by this policy.

To help staff, volunteers, and board members meet their legal responsibilities, everyone will be made aware of their responsibilities in relation to their areas of work.

Compliance with the law is the responsibility of all staff, volunteers, and board members. GCK will regard any unlawful breach of data protection, as a serious matter which may result in disciplinary action and could be grounds for dismissal for gross misconduct.

Any questions or concerns about the interpretation or operation of this policy statement should in the first instance be referred to the points of contact listed at the end of this policy.

## **The personal information GCK holds**

### **1. Internal Data Records**

GCK obtains personal data (including names, addresses, email addresses, emergency contact details, references) from current and past staff, volunteers and board members. This data is stored and processed for purposes such as recruitment, HR and volunteer management. Consent is obtained for storing and using this data when staff, volunteers and board members start to work with the organisation.

All personal information will be either kept on Leslie Barson's or Hannah Leigh Mackie's password protected mobile phone, the info@ or garden@granvillecommunitykitchen.org.uk password protected email account, the shared google drive (where any personal information is password protected and only accessible by relevant staff and board members) or on paper (where it is stored in secure, locked, storage). This information is accessible to relevant staff and board members.

### **2. Good Food Box data records**

GCK obtains personal data (including names, addresses, email address and phone numbers) from Good Food Box members. This data is obtained, stored and processed solely to assist staff and volunteers in the efficient running of the GCK Good Food Box. Consent is obtained for storing and using this data when Good Food Box members sign up to the service. Personal data is collected over the phone, via the GCK online joining form and using other methods such as email. During this initial contact, the data owner is given an explanation of how this information will be used, confirming that they agree to that when they sign up.

All personal information will be either kept on the shared google drive (where any personal information is password protected and only accessible by relevant staff and board members) or in the goodfoodbox@granvillecommunitykitchen.org.uk email account (which is password protected). This information is accessible to relevant staff, board members, and volunteers.

### **3. Food aid provision data records**

GCK collects personal data (names, addresses, phone numbers, date of birth and dietary and allergen information) for food aid recipients. This data is obtained, stored and processed solely to assist staff and volunteers in the efficient running of the GCK food aid project. Consent is obtained for storing and using this data when recipients sign up to the service. Personal data is collected over the phone, via email, and given to GCK by other referring organisations. During this initial contact, the data owner is given an explanation of how this information will be used, confirming that they agree to that in order to receive the service.

All personal information will be either kept on Leslie Barson's password protected personal computer, the info@granvillecommunitykitchen.org.uk password protected email account, the shared google drive (where any personal information is password protected and only accessible by relevant staff and board members) or on paper where it is stored in secure, locked, storage. This information is accessible to relevant staff, board members, and volunteers.

### **4. Courses and classes data records**

GCK collects personal data (names, addresses, phone numbers, date of birth, educational

achievements and needs, and health needs) for those that take part in courses or classes run by GCK. This data is obtained, stored and processed solely to assist staff and board members in the efficient running of GCK's courses and classes. Consent or parental consent (where the individual is under 18) is obtained for storing and using this data when recipients sign up to the courses or classes. GCK deems the personal data of under 18s as particularly sensitive and acts accordingly. Personal data is collected over the phone, via email, and in person. During this initial contact, the data owner is given an explanation of how this information will be used, confirming that they agree to that in order to receive the service.

All personal information will be either kept on the shared google drive (where any personal information is password protected and only accessible by relevant staff and board members), on paper (where it is stored in secure, locked, storage), or in the info@granvillecommunitykitchen.org.uk, asdan@granvillecommunitykitchen.org.uk, or garden@granvillecommunitykitchen.org.uk email accounts (which are password protected). This information is accessible to relevant staff, board members, and volunteers.

This table summarises the above information:

Type of data	Who will access parts of it	Where is it stored
Internal data records - from current and past staff, volunteers and board members	Relevant staff and board members	Leslie Barson or Hannah Leigh Mackie's mobile phone The info@ and garden@ email accounts The shared google drive On paper
Good Food Box data records - from past and current members	Relevant staff, board members, and volunteers	The goodfoodbox@ email account The shared google drive
Food aid provision data records - for people receiving food aid	Relevant staff, board members, and volunteers	Leslie Barson's mobile phone The info@ email account The shared google drive On paper
Courses and classes data records - from current, prospective and past students - At GCK the personal data of under 18s is deemed particularly sensitive	Relevant staff, board members, and volunteers	The shared google drive On paper The info@, asdan@, or garden@ email accounts

## Procedures

All the personal data that GCK collects is for the purpose of running the organisation and delivering the services of GCK, and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or

historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes.

GCK stores staff, board member, volunteer and service user personal data electronically and on paper as outlined above. Paper-based data are stored in organised and secure systems or destroyed after use. Electronically stored personal data (on Leslie Barson's personal computer, on mobile phones, on the GCK shared google drive and in GCK email accounts) are all stored with password protection.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation, in which case the GCK coordinators will decide and agree disclosure if appropriate.

Only GCK's staff, volunteers and trustees will have access to personal data, and then only those who need it in order to deliver their work with GCK. All staff, volunteers and board members are made aware of the Data Protection Policy and their obligation not to disclose personal data to anyone who is not supposed to have it.

Individuals will be supplied with a copy of any of their personal data held by GCK within a month if a request is made.

If a request is received from an individual to destroy their records, we will remove their details from the database and request that all staff holding paper or electronic details for the organisation destroy them within a month of when the request is made.

Personal data will be stored for as long as the data owner is involved with the organisation and normally longer. Where a service user ceases to use our services and it is not deemed appropriate to keep their records, their records will be destroyed after 4 years. However, unless we are specifically asked by an individual to destroy their details, we will normally keep them on file for future reference. In the instance of staff, volunteers and board members, unless specifically requested by the individual to destroy information held, all data will be stored indefinitely after an employee, volunteer or board member leaves the organisation in order to be used for future references.

GCK will take reasonable steps to keep personal data up to date and accurate.

GCK regularly reviews the data it collects to ensure it follows the principles listed above. This policy will be reviewed biannually.

Where practicable, GCK will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), GCK will endeavor to remove any photograph if a complaint is received.

This table summarises the ways in which we make our personal data handling secure:

Where is it stored	Safety measures
Staff or coordinator mobile phone	Mobile phones MUST be password protected and used solely by the staff or coordinator

Email accounts	<p>Only official granvillecommunitykitchen.org.uk email accounts to be used for personal data processing</p> <p>All email accounts MUST be password protected</p> <p>It is recommended that staff use a password manager to protect their passwords</p> <p>Passwords must be strong and unique</p> <p>Passwords must be changed every 6 months</p> <p>Where emails are configured to a google account, the above must also be true for the google account.</p>
The shared google drive	<p>All google accounts are password protected</p> <p>Passwords must be strong and unique</p> <p>Passwords must be changed every 6 months</p> <p>All staff and coordinators are required to do an annual security check-up on their google account.</p> <p>Only staff and coordinators have access to the shared google drive.</p> <p>All documents on the shared google drive have restricted sharing.</p>
On computers	<p>All personal and GCK computers to have up to date anti-virus and malware software</p> <p>All personal and GCK computers to require a password login</p> <p>No personal data is to be stored on staff or board members personal computers or personal google drives.</p>
External hard drive	<p>A back up of the GCK google drive is taken at regular intervals.</p> <p>This hard drive is password protected.</p>
On paper	<p>All paper copies of personal information are stored in a locked folder at Leslie's house or at The Granville</p>

### **GCK points of contact for Data protection issues**

The following individuals are responsible for enquiries relating to this policy:

- Beni Stewart, Farm Project coordinator  
Email on [Beni@granvillecommunitykitchen.org.uk](mailto:Beni@granvillecommunitykitchen.org.uk)
- Leslie Barson, coordinator
- Email on [info@granvillecommunitykitchen.org.uk](mailto:info@granvillecommunitykitchen.org.uk)