



Strategic Objective

The Yard will ensure the proper treatment of personal information, in order to maintain the confidence of our members and employees, and to ensure that we are working within the appropriate legislation.

General Statement and Principles

The Yard needs to collect personal information about people with whom it deals in order to carry out its business and provide its services.

The information includes name, address, email address, date of birth, private and confidential information and information that could be considered sensitive, such as health-related information. In addition, The Yard may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law, for example, health and safety law to ensure the comfort, health and safety of our families and children. No matter how it is held (e.g. on a computer or on paper) this personal information will be handled and used properly to ensure compliance with the requirements of the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018 (the Act).

The Yard fully supports and complies with the six principles of the GDPR which are summarised below:

1. Personal information shall be processed lawfully, fairly and transparently.
2. Personal information shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Personal information shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Personal information shall be accurate and, where necessary, kept up to date.
5. Personal information shall not be kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which it is processed.
6. Personal information shall be processed in a manner that ensures appropriate security of the personal information using appropriate technical or organisational measures.

Target Audience

All

Roles and Responsibilities

The Yard has appointed a Data Protection Officer (DPO), who has overall responsibility for:

- informing and advising The Yard on compliance with the GDPR and the Act
- delivering training for all staff members who handle personal information, which is relevant and specific to their roles within The Yard
- providing clear lines of reporting and supervision for compliance with the GDPR and the Act
- undertaking regular checks to monitor The Yard's compliance with the GDPR, the Act and policies and assessing new processing of personal information by undertaking data protection impact assessments of the same (if necessary)
- acting as the point of contact for all enquiries from individuals and the Information Commissioner's Office (ICO)

Employee Responsibilities

All employees, through appropriate training and responsible management, must:

- Observe all forms of guidance and codes of practice issued by the ICO and The Yard's policies and procedures regarding the collection, handling and use of personal information from time to time.
- Understand fully the purposes for which The Yard uses personal information and ensure that their handling and use of personal information does not exceed such purposes.
- Collect and process appropriate personal information, but only insofar as it is relevant to their roles and the purposes for which it is to be used by The Yard to meet its service needs and legal requirements.
- Ensure that personal information is correctly input into The Yard management systems to reduce the possibility of inaccuracies arising.
- Ensure that the personal information is destroyed (in accordance with legal requirements) when it is no longer required by The Yard.
- Direct any requests received from an individual exercising their GDPR rights to the DPO immediately so that the request can be complied with and responded to appropriately within required timescales.
- Keep personal information secure by following a clean desk policy, keeping sensitive personal information in locked cabinets and drawers and observing the highest standards of confidence.
- Inform the DPO immediately of any actual or prospective data security breach incidents to ensure that The Yard can meet GDPR requirements regarding notification of such breaches to the ICO and affected individuals within required timescales.

Monitoring

Compliance with the policies and procedures laid down in this document will be monitored by the DPO on a regular basis (no less than annually).

Records

Annual review of Data Protection arrangements

Support Resources and References (if applicable)

www.ico.org.uk

Links to other policies

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8	Approved	2.0	July 2018		2 years
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