

V1.2 Reviewed Oct 2023

## **General Data Protection regulation Action Plan**

We are not required to register with the ICO as a data processor and do not require a data Protection Officer.

**Person responsible for data protection** David Morrow (Elder)

### **Awareness**

Fixed item on agenda at Annual General Members meeting  
Fixed item on monthly agenda at OB meetings and reviewed annually  
Inform organisation leaders of their responsibilities  
Add awareness training to safeguarding and fire safety training  
Retain cover with insurers for data breach  
Review data protection compliance on risk register

### **Identify Data**

Annual Data Audit – What, why, how stored, who has access, sensitivity, how long held, third parties – eg Payroll  
Processes

### **Privacy Notices**

Review annually  
Specify for what purpose data collected and retained.  
Minimal information and how long retained.  
Security

Include Lawful basis for processing data for each set of personal data:

- Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- Legal obligation: the processing is necessary for you to comply with the law.
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

### **Procedures**

Review annually  
Train regularly

### **Consent**

Review how we seek, record and manage consent  
Refresh existing consents  
Must be specific, informed and affirmative and be periodically refreshed  
Can we demonstrate?

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### **Children**

Obtain Parental or guardian consent to process and hold data

### **Data Security**

Encryption of electronic data

Hard copies held securely

Personal devices – advice given

Storage secure

Access limited to essential