**Managing information policy**

At Girlguiding Anglia we use personal data and information every day – we couldn’t operate without it - and all our Girlguiding Anglia staff and volunteers must make sure they collect and use information appropriately, and store it safely.

This is our legal requirement and it protects the privacy of our members, volunteers, customers and employees.

This public-facing policy sets out how Girlguiding Anglia aims to make sure all our information is managed appropriately. It must be followed by all volunteers and staff who handle Girlguiding Anglia information and personal data [link to procedures].

**What do we use personal data and information for?**

Girlguiding Anglia needs to keep personal data about its employees, young members, volunteers, customers, supporters and donors in order to:

* Deliver guiding services to girls and young women
* Safely recruit and develop volunteers and staff
* Pay employees
* Safeguard young people and vulnerable adults
* Monitor performance
* Monitor health and safety
* For many other functions helping us to give guiding services to our members.
* To collect and process personal data to ensure that Girlguiding Anglia complies with its statutory obligations.

**Why volunteers and staff must follow this policy**

As a Girlguiding Anglia volunteer or member of staff you must follow all our policies and procedures, including this information management policy. This is not part of the contract of employment for staff or the Code of Conduct for volunteers, but it is a condition of your employment or voluntary service.

If you don’t follow this policy and its related procedures you may, as staff, have disciplinary proceedings applied [link to procedures] or if you’re a volunteer, action under the managing concerns about adult volunteers policy [link to policy- GG website page].

While data protection legislation only applies to personal data, Girlguiding Anglia requires its volunteers and staff to follow this policy and its supporting procedures when processing any kind of information, personal or otherwise belonging to Girlguiding Anglia. This is to ensure best practice at all times.

**Does this policy apply to everyone at Girlguiding Anglia?**

Yes. This policy applies to the entire Girlguiding Anglia organisation, including Girlguiding Anglia’s activity centre, Hautbois House and retail arm.

**Definitions:**

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| --- | --- | --- |
| **Term** | **Definition** | **Example** |
| Data controller | A person or an organisation who alone, or with others, decides how and why collected data will be used. | Girlguiding is the data controller for most personal data – like the GO records - used by staff and volunteers. Girlguiding Anglia is controller of ???? |
| Data breach | An act or occurrence which causes the loss, destruction/erasure, alteration, unauthorised disclosure/sharing of, unauthorised access to, unauthorised use/ publication of personal data. | * Emailing personal data (information) to the wrong person * Leaving personal data unsupervised or in a public place where others can access it |
| Data subject | A data subject is a living individual who is the subject of the personal data. | * A member * A young member * A donor * A parent |
| Personal data | Any information relating to an identifiable person (a ‘data subject’). Personal data also includes special category personal data: any permanent characteristics of a persons’ physical, physiological, genetic, mental, economic, cultural or social identity. | * Name, address etc. * Telephone number * Email address, twitter handle * IP address * Photograph * Disability or health data * Ethnicity data |
| Data processing | The use, collection, storage and disposal of personal data. | * Storing GO data * Sharing member information by email * Shredding when information is no longer required |
| GDPR | General data protection regulation. | * UK data protection legislation, enforceable in May 2018. |
| Joint Controller | Where two or more (data) controllers jointly determine the purposes and means of processing, they shall be joint controllers. | * Employed staff for Countries and Regions are joint controllers with Girlguiding when using CRM /GO data |

**What does this managing information policy cover?**

* [Governance and compliance](#Governance) – meaning the actions Girlguiding Anglia will take to make sure this policy is followed.
* [Data protection](#DPPolicy) – meaning how we make sure personal data is kept confidential and used appropriately.
* [Information security](#InformationSecurityPolicy) – meaning how we keep information secure.
* [Records management](#RMPOLICY) – meaning how we keep and dispose of records.

See below for more information on all of these categories.

**Governance and compliance**

Who is accountable for this policy in Girlguiding Anglia, and responsible for it being followed across the organisation?

* **Board of Trustees (level 1)**

The Board of Trustees will approve this policy and related policies, and is ultimately accountable for compliance across Girlguiding Anglia.

* **Senior Management Team – (level 2)**

The Management Team allocates a person to be ultimately responsible for compliance across Girlguiding Anglia. This person will be the Marketing, Communications and Events Manager.

* This person must have understanding of the relevant information governance legislation.
* This person will be the point of contact with the Information Commissioner’s Office (ICO) and for any queries about the policy for staff, members, volunteers and the public.
* **Board of Trustees – Counties (level3)**

The Boards of Trustees in the Counties will approve this policy and related policies and are accountable for compliance across Girlguiding Anglia in their respective Counties.

**Notifications under the General Data Protection Regulations**

Girlguiding Anglia as a body corporate is registered as a Data Controller with the Information Commissioners Office (ICO).

The registration number is: **ZA097660** Renewal date: confirm with BD

The Notification shall be reviewed annually by the Executive Team.

**Data protection**

* **Data principles**

Girlguiding Anglia is committed to ensuring the appropriate use and management of personal information. We follow the data protection principles and requirements to make sure that personal data is:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| |  |  | | --- | --- | |  | * Processed lawfully, fairly and in a transparent manner in relation to the data subject [Add link to Handling data procedure]. | |  |  | |
|  |
| |  |  | | --- | --- | |  | * Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (See: fair processing notice)   [Add link] | |
|  |
| |  |  | | --- | --- | |  | * Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. For example, If you are collecting data to allow a girl to join Girlguiding it is not necessary to collect any personal data about her parents other than contact details | |
| |  |  | | --- | --- | |  | * Accurate and, where necessary, kept up to date. | |
|  |
| |  |  | | --- | --- | |  | * Not kept for longer than is necessary (see: Girlguiding data retention framework). | |
|  |
| |  |  | | --- | --- | |  | * Processed in accordance with the rights of the data subject   [link to definition table].   * Compliant with the data security principles set out in the updated GDPR legislation [link to data security procedure/guidance]. | |

* **Legal basis for processing personal data**

Girlguiding Anglia must have a legal basis to collect and use personal data, within data protection law there are six legal bases. Girlguiding Anglia makes use of the most appropriate legal basis when processing different categories of personal data for different purposes. The Girlguiding Anglia privacy notice states what basis is used and when. [Link to legal basis for processing within the Fair processing notice]

* **Data protection law – an individual’s rights**

Girlguiding Anglia respects your following rights as an individual:

* The right of access
* The right of rectification
* The right of erasure
* The right to restrict processing
* The right to object
* The right of portability

[Add link to Personal Data requests procedure]

* **Information security**

As Girlguiding Anglia staff and volunteers, if you process information on behalf of Girlguiding Anglia you are responsible for making sure that data security is maintained, in line with the managing information policy and any related Girlguiding Anglia procedures.

Girlguiding Anglia will ensure that appropriate technical and organisational measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. [Add link to data security guidance]

* **Records management - keeping information**

Girlguiding Anglia has a duty to keep some employee, member and volunteer personal data for a period of time after they have left Girlguiding and/or Girlguiding Anglia. This is mainly for legal reasons, but also for other purposes, for example so we can provide references and for historical and statistical research. Different categories of data will be kept for different periods of time.

Girlguiding Anglia will not keep personal data for longer than is necessary for the purpose it was originally collected for. This means that data will be destroyed or erased from our systems when it is no longer required.

[Add link to data retention framework]

* **What are Girlguiding Anglia’s responsibilities?**

Girlguiding Anglia commits to:

* Implement this information management policy and make sure it complies with data protection legislation.
* Co-operate with the relevant regulatory bodies and name a contact point.
* Ensure this policy is up to date.
* Give appropriate guidance and training to Girlguiding Anglia employees and volunteers to help you to comply with this policy.
* Make sure that personal data is destroyed safely (in line with Girlguiding’s data retention schedule).
* Systematically identify and respond to any data protection queries which may arise.
* Handle all requests and complaints from data subjects relating to Girlguiding Anglia’s use of their personal data.
* Use a risk-based approach to its processing activities. This will include the use of data protection impact assessments (DPIA) for high-risk processing activities where necessary.
* Maintain and be able to give the relevant regulatory bodies organisational records and evidence of the following practices:

1. Name and details of the organisation
2. Purposes of the data processing
3. Description of the categories of individuals and categories of personal data being processed
4. Categories of recipients of personal data when disclosed
5. Details of transfers to parties outside the European Union including documentation of the transfer mechanism safeguards in place
6. Data retention schedules
7. Description of technical and organisational security measures

* **What are Girlguiding Anglia volunteer or staff responsibilities?**

As a volunteer or member of Girlguiding Anglia staff, if you process personal data as part of your role you must:

* Follow this policy and relevant procedures whenever personal data is being used for planning and delivering Girlguiding Anglia activities.
* Follow Girlguiding Anglia procedures, guidance and codes of practice about the collection and use of personal data.
* Think about why you need to handle personal data and make sure you use as little data as you need to carry out your task.
* reduce as much as possible the likelihood of breach i.e. personal data being lost, inappropriately shared or disclosed, altered, destroyed, or published without permission, by maintaining good data handling practices with adequate control measures in place
* report any data breaches to the Data Protection team immediately on discovery
* establish, maintain and follow guidance around effective systems for reporting, monitoring and responding to any emergencies that could arise in relation to data protection
* make sure that personal data is destroyed safely (in line with Girlguiding’s data retention schedule)
* inform your line manager (staff) or Commissioner (volunteers) and the data protection team immediately if you receive a request from a data subject for information held or used about them
* **Exemptions – when does this data protection legislation not apply?**

Some data is exempted from the provisions of data protection legislation. Examples include:

* National security and the prevention or detection of crime.
* The assessment of any tax or duty.
* Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Girlguiding Anglia.

You can find more information on exemption here: [Add Link to ICO guidance on exemptions] https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/exemptions/

* **How do I use this policy?**

You must refer to the related statements, procedures and guidance and comply with them. Relevant documents include:

* Data retention schedule
* Privacy statement
* Data protection procedures
* Social media policy
* Data protection e-learning package (staff and volunteers)
* Keeping data safe guidance for volunteers
* Keeping data safe guidance for staff
* Finance policy and procedures
* Safeguarding policy and procedures
* Data security policy
* IT policies
* **More information**

You can find help and support in relation to data protection from the Data Protection Officer at Girlguiding Anglia.

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