



**Made In Hackney
Data Protection Policy
Last Updated: 16.05.2018**

Definitions

Charity	Made In Hackney (MIH), a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	Jessie Greer, Trustee & Data Protection Officer dataprotection@madeinhackney.org
Register of Systems	See Below

Register Of Systems

Data collected and stored by MIH	Lawful basis for holding data
Names and email addresses collected by MIH team members at MIH sessions, MIH events and events held by others.	Consent
Names, email addresses, D.O.B., phone numbers, previous classes attended, food allergies, photo consent, names and ages of children (if applicable) and addresses of people due to attend, attending, or whom have attended, MIH programmes such as classes, events, feedback evenings. This is stored on booking forms, RSVP lists and on our data base.	Consent
Names, email addresses, D.O.B, phone, address of people who have actively signed up to receive our online communications.	Consent
Business names, contact name, email addresses, phone numbers, registered business address, public liability insurance policy numbers, of kitchen hire clients.	Legitimate Interest
Business names, contact names, PO numbers, email addresses, address, phone numbers, websites, 2 nd contact phone number of any	Legitimate interest

companies or service user groups who are required to make a payment to MIH.	
A data base of service user groups, community groups, charities and other third sector organisations who's service users are able to access the MIH programme.	Legitimate interest
MIH records a small amount of group data about attending participants from third sector, community groups and charities including dietary and medical information for individuals.	Legitimate interest
MIH holds a small amount of data on past or potential clients such as company name, contact name, phone number, email, website, address and the service we have delivered for them, or are offering to deliver for them.	Legitimate interest
MIH holds name, age, area person lives in, gender, disability status, employment status, email, phone number, address, medical conditions, food allergies of participants who have attended our programmes and have completed our Evaluations forms either on paper, verbally over the telephone or digitally.	Consent
MIH holds a small amount of data – names, email and phone numbers of people who have agreed to attend a MIH event or feedback evening in the form of RSVP lists.	Legitimate interest
MIH records data about employees, freelance team members and volunteers including the number of their DBS certificates, NI number and tax reference number.	Legitimate interest
MIH holds a small amount of data on supporters such as businesses, brands, restaurants and small enterprises who have either previously given, or could give support to the charity. The data includes name, email, phone number, support given previously, website, address.	Legitimate interest
MIH holds a small amount of data on community halls, kitchens and other venues to hire. Venue name, contact name, email, phone number, venue address, website.	Legitimate interest

Introduction

The General Data Protection Regulation (GDPR) is the new framework for data protection laws. It replaces the previous 1995 data protection directive, which current UK law is based upon. The new regulation starts on 25 May 2018. It will be enforced by the Information Commissioner's Office (ICO). **A guide to GDPR can be found here:** <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Made In Hackney (MIH) collects and holds some personal data relating to the MIH team (staff, sessional workers and volunteers) and its beneficiaries in order to promote and run Made In Hackney activities.

Made In Hackney needs to ensure data is collected and dealt with appropriately. This policy applies to all personal data processed by Made In Hackney. This policy has been updated to comply with GDPR in place from May 2018 and will be reviewed at least annually.

As a small charity, Made In Hackney is exempt from registration with the ICO.

Made In Hackney will not share personal data with other organisations or third parties, except in exceptional circumstances (see part 4 below).

Anyone whose data is recorded by Made In Hackney have the right to access, amend or have their personal data deleted, and any such requests made to the charity shall be dealt with by our Data Protection Officer and Trustee Jessie Greer.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes 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 not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

- d. The Charity does not need to register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access, amend or have their personal data deleted, and any such requests made to the charity shall be dealt with in a timely manner, and in accordance with the timescales under the GDPR.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.
- e. If deemed appropriate, Made In Hackney may share data with other agencies such as the local authority, Ofsted and local Child Protection and Safeguarding teams personal data relating to a safeguarding incident or disclosure. The Data Subject will be made aware (in most circumstances) how and with whom their information will be shared. There are circumstances where the law allows Made In Hackney to disclose data (including sensitive data) without the data subject's consent. These are:
 - Carrying out a legal duty or as authorised by the Secretary of State
 - Protecting vital interests of a Data Subject or other person
 - Conducting any legal proceedings, obtaining legal advice or defending any legal rights
 - Monitoring for equal opportunities purposes – i.e. race, disability or religion

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. [Add considerations relevant to the Charity's particular systems]

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. The Charity offers people the opportunity to update their preferences and details via links at the end of their online communications

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY