



Made In Hackney Data Protection Policy

Last Updated: 21 May 2020

Definitions

Charity	Made In Hackney (MIH), a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	Tara Sukumar, 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
<p>MIH Event Attendees. Names, email addresses, phone numbers, food allergies, photo consent, names and ages of children (if applicable), previous classes attended, and addresses of people due to attend, attending, or whom have attended face to face MIH cookery classes, educational events, feedback evenings or other programmes. This data is collected by MIH staff and volunteers via email enquiries, phone calls, social media and online bookings and then stored in MIH's in house Salesforce platform (a cloud based customer relationship management system 'CRM'). Data is also collected for masterclass attendees from a third party ticketing provider Biletto. Attendees provide consent via email and on booking forms. The data is needed to enable timely communication with attendees about event information and to comply with any special needs.</p>	Consent
<p>Outreach Event Attendees. Names and email addresses of people collected by MIH team members from sign up sheets at outreach and client events, and events held by others. A tickbox column on the sheets indicates consent has been provided. This data is stored in salesforce CRM and a Third Party newsletter provider 'MailChimp' and used to add event attendees to the monthly MIH newsletter.</p>	Consent
<p>Online Communications. Names, email addresses, phone number of people who have actively signed up (at an event or via our website) to receive our online communications such as our monthly newsletter. Consent is requested at the online sign up stage. This data is stored in a Third Party newsletter provider MailChimp and in MIH's in house Salesforce platform and is used to send people our monthly MIH newsletter.</p>	Consent

<p>Kitchen Hire Clients. Organisation names, contact name, email addresses, phone numbers, registered business address, public liability insurance policy numbers and food hygiene certification are collected from kitchen hire clients. This data is collected by MIH staff during the client engagement process and stored in salesforce. Consent is given when the hire agreements are confirmed. It is needed for processing the kitchen hire agreement and to comply with food hygiene and safety standards.</p>	Legitimate Interest
<p>Payees and Invoices. Organisation names, contact names, purchase order numbers, email addresses, postal addresses, contact phone numbers, invoice amount, of any organisations or service user groups who are required to make a payment to MIH. This data is collected by MIH staff in an internal Master Invoice document on drop box to enable invoices to be sent out, tracked and book keeping records kept up to date.</p>	Legitimate interest
<p>Partner Organisations. Organisation names, contact names, email addresses, phone numbers and details of any special needs of participants from service user groups, community groups, charities and other third sector organisations who's service users attend MIH programmes. This data is collected by MIH staff via email correspondence and surveys with each group and stored in salesforce. It is used to tailor the programme to fit their unique needs.</p>	Legitimate interest
<p>Health, Disability and Dietary Needs. MIH records essential information about attending participants from third sector, community groups and charities relevant to their participation in events including dietary, disability and medical information. This data is collected by MIH staff and volunteers via email correspondence and surveys with each group and stored in salesforce CRM. It is used to tailor the programme to meet their special needs.</p>	Legitimate interest
<p>Prospect and Past Clients. MIH holds a small amount of data on past or potential clients such as organisation name, contact name, phone number, email, website, address and the details of the service we have delivered for them, or are offering to deliver for them. This data is collected by MIH staff via email correspondence with the clients and internet research and stored in salesforce CRM. It is used to tailor the service or event to meet their requirements.</p>	Legitimate interest
<p>Surveys. MIH collects survey data from various sources.</p> <p>For those attending our cookery programmes data is collected by MIH staff and volunteers before and after the classes on name, age, gender, area person lives in, employment status, email, phone number, address, food allergies medical conditions, disabilities, and changes in behavior, health and eating habits.</p> <p>For those receiving our emergency meals during Covid19 pandemic data is collected on name, age, ethnicity, area person lives in, employment status, and opinion of food, delivery service, and whether they want to continue receiving meals in the future.</p> <p>Consent is given by a question on the meal referral form before data is submitted. This information is needed to personalize and cater for the special needs of vulnerable meal recipients.</p> <p>These survey forms are provided to complete either online, at an event (on paper) or verbally collected over the phone. The responses are stored in salesforce CRM and a Third Party form provider '123 Form Builder' and inform</p>	Consent

<p>MIH on how to improve and adapt its services and are also required by funders as evidence of meaningful social impact.</p>	
<p>HR – Staff and Volunteers. MIH records essential HR information about employees, freelancers and volunteers including name, email address, phone number, emergency contact details, PAYE information (national insurance number, bank details and tax reference number,) contracts, DBS certificates, training certificates, past employment history, relevant skills, availability, medical conditions and availability for work. This data is collected by MIH staff via application forms and email correspondence and is stored in salesforce CRM and a Third party survey provider ‘123 Form Builder’. It is used to assign applicants to suitable work and volunteering opportunities and keep regular communication.</p>	<p>Legitimate interest</p>
<p>Job and Volunteer Applications MIH records HR information about job applications, freelancer and volunteer applications, including name, email address, phone number, relevant training history, past employment history, relevant skills, availability, right to work in the UK, medical conditions, criminal history. This data is collected by MIH staff via application forms and email correspondence and is stored in salesforce CRM and a Third party survey provider ‘123 Form Builder’ It is used to shortlist applicants for interview. Consent is provided via a specific tick box when the forms are submitted.</p>	<p>Consent</p>
<p>Supporters and Funders. MIH holds data on supporters and funders such as businesses, brands, restaurants, small enterprises, and grant funders who have either previously donated, or could give support in future to the charity. The data includes organisation name, contact name, email, phone number, amount and type of support given, (financial and/or in kind) website, address. This data is collected by MIH staff via email correspondence with the organisations and stored in salesforce CRM. It is used for reporting purposes to include in financial accounts and the Annual Report.</p>	<p>Legitimate interest</p>
<p>Venues for Hire. MIH holds a small amount of data on community halls, kitchens and other venues to hire such as venue name, contact name, email, phone number, venue address, hire fee, website. This data is collected by MIH staff and volunteers via email correspondence with the venues and internet research and stored in salesforce CRM. It is used when MIH needs to hire an external venue.</p>	<p>Legitimate interest</p>
<p>Covid19 Meal Deliveries. MIH staff and volunteers collect and store information on emergency meal delivery recipients and the organisations that referred them, during the Covid19 pandemic such as name, phone number, email address, address, delivery instructions, number of meals requested, co-dependents, food allergies, medical conditions, emergency contact details and consent for media contact. This data is collected using an online referral form from the MIH website and email requests from referral organisations and stored in salesforce CRM and a Third Party survey provider 123 form builder. Consent is given by a question on the referral form before data is submitted. This information is needed to personalize and cater for the special needs of vulnerable meal recipients.</p>	<p>Consent</p>
<p>Online Events. Names, email addresses, phone numbers, previous classes attended, food allergies, photo consent, of people due to attend, attending, or whom have attended online cookery classes and events. The data is collected from the MIH website, social media and via an online ticket platform Biletto and</p>	<p>Consent</p>

stored in salesforce CRM. It is needed to enable timely communication with attendees about event information and logistics.	
Juicing Enterprise. MIH staff collect and store a small amount of data on organisations involved in its juicing activities such as venue landlord, suppliers, partner organisations and supporting brands. The data includes name, email, phone number, organization address, website, address and latest communications and stored in salesforce CRM. It is needed to enable communication with stakeholders involved in the day to day operations.	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 started on 25 May 2018. It is 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 and supporters in order to promote and run Made In Hackney activities. Based on standard best practice, if there has been longer than 3 years inactivity in a contact record the data is archived and/or deleted.

Made In Hackney needs to ensure data is collected and dealt with appropriately. Two Project Directors, four Programme Managers and up to five project volunteers process the data listed above in salesforce CRM and have access to use it after collection. The level of data permissions for volunteers is lower than for core staff to avoid volunteers having access to sensitive data.

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. The latest review was in May 2020.

As a small charity, Made In Hackney is exempt from registration with the Information Commissioner's Office (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 Tara Sukumar.

The method of collecting consent is by various methods according to each specific situation, including verbal consent over the phone, by email, as part of the newsletter sign up process, and in online surveys. An individual's consent is recorded in the contact record in salesforce CRM. Examples of consent requests follow:

- 1) Online survey method. 'Tick here only if you give consent for us to store your data for the purpose of our food delivery service.'
- 2) Disclaimer in E Mail Signatures: 'We may contact you via email or phone in connection with Made in Hackney's cookery classes, events, food delivery service or other activities, but for no other reason. You can ask to see what data is stored about you at any time. If you no longer wish to receive emails from us you can reply with OPT OUT and we will take you off our system. Our Privacy Notice and Data Protection Policy is available to read on our website. <https://madeinhackney.org/>'

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 (ICO) 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.

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 where 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

Any incidents of suspected consent or data breach our logged in salesforce CRM with date, what happened and any mitigating action taken.

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