

TYNEDALE TALKING NEWSPAPER
DATA PROTECTION & CONFIDENTIALITY POLICY

Introduction

Tynedale Talking Newspaper (TTN) needs to hold certain information about service users (listeners) and volunteers in order to carry out its work. This must be collected and dealt with appropriately, whether held on paper or in a database. TTN regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

Data protection is governed by the Data Protection Act (DPA, 1998), and the General Data Protection Regulations (GDPR, 2018), and is overseen by the Information Commissioner's Office (ICO).

TTN is **not** required to be registered with the ICO because we are a not-for-profit organisation and we:

- only process information necessary to provide and administer our service;
- only share the information with those who directly carry out TTN's activities; and
- only keep the information while the individual is a member or service user.

However, it is still important that TTN adheres to the principles of data protection, which are that data must be:

- a) obtained and processed fairly and lawfully;
- b) adequate, relevant and not excessive;
- c) accurate and up to date;
- d) kept no longer than necessary;
- e) processed in accordance with the rights of data subjects;
- f) kept secure, taking appropriate measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.

TTN's management committee has overall responsibility for ensuring adherence to these principles.

Types of information held and processed

TTN's registrar holds and maintains details of listeners, which include: name; address; telephone number; name/telephone number of a contact person or carer; whether registered as vision impaired; and notes (mostly contact history). This data enables us to send weekly recordings to listeners, and to monitor any lack of contact from them. It is accessible only to authorised TTN volunteers.

TTN's secretary holds and maintains contact details of trustees and volunteers, including name, telephone number, and postal and/or email address. The volunteer records help TTN to ensure that only authorised volunteers have access to listeners' personal information.

No categories of sensitive personal data are held.

Consent

An application to receive TTN includes the personal details which enable TTN to provide the service. Consent for TTN to use the data is therefore implied and does not need to be specifically requested.

Sharing information with other organisations

TTN will not share personal information with other organisations unless legally obliged to do so.

TTN's procedures for processing and securing data

(For full details please see our data management processes document.)

Registrar database. The master copy of the listener data is held by the Registrar and a member of the technical team on a password-protected database on password-protected personal computers (PC). Data is exported to encrypted backups. For printing address labels, data is exported to spreadsheets.

Address labels. A set of labels is printed each week by the Registrar and taken to where the recordings are made. Until recording day, the labels are stored in a locked cupboard in a locked room. On recording day, the labels are under supervision of authorised volunteers until the wallets are taken for postal collection.

USB Copiers. USB Copiers are used to duplicate USB memory stick recordings sent to listeners. No personal data is stored on these copiers.

Volunteers in recording teams. On recording days, volunteers have access to listeners' names and addresses. All volunteers must understand that this information is confidential; listeners' names, details, or the fact that they receive TTN, must never be shared or discussed with anyone outside the team.

Trustee and volunteer information. Trustee and volunteer contact details are held on the secretary's own PC. The committee list is regularly updated and emailed to other committee members. The volunteer lists are in password-protected spreadsheets, one for each team and one for the reserves list. The list for each team is shared occasionally by email with the relevant team leader for updating purposes. The reserves list is emailed when necessary to any team leader who urgently needs to find another volunteer. All trustees and volunteers are asked to keep all these lists confidential.

Electronic communications and storage

All trustees and volunteers should take great care when including personal information in emails, especially in extended strings of email dialogue and in group emails. Where practicable, such emails should be permanently deleted as soon as the matter is concluded. A reminder too that any data stored or backed up in the 'cloud' is also subject to data protection provisions and should be deleted rather than archived when it has served its purpose

Subject access requests

Any listener or volunteer may approach TTN at any time to verify the data we hold for them and to ensure that it is correct. Requests should be made in writing to the secretary who will aim to provide a prompt response.

Breaches in data protection

Any unauthorised disclosure of personal data must be reported immediately to the management committee via the registrar or secretary. The committee will be responsible for investigating the matter and taking appropriate steps to resolve the issue; this action could include notifying the ICO and service users if the breach results in high risk to data subjects' rights and freedoms. Any such breach will be viewed seriously. A trustee could be personally liable for any penalty arising from a breach that they have made. Any unauthorised disclosure made by a volunteer may result in the termination of their position as a volunteer.

Privacy notice

The following privacy statement is (*to be*) included on TTN's website:

"When you apply to receive Tynedale Talking Newspaper, we keep a record of your name, address, telephone number, whether you are registered as having impaired vision, and contact details of a carer or next of kin. We will hold this information for as long as you receive our service, and will use it to send your weekly recordings, to register returned recordings, and to contact you if we haven't heard from you. We will never share your information with other organisations unless legally obliged to do so. To ensure that your details are kept safe, we have security procedures to prevent loss or unauthorised access. You can ask us what information we hold about you by contacting us at any time."

Review

This policy will be regularly reviewed as necessary to reflect best practice in data management and to ensure compliance with any changes in Data Protection law.

Training

All trustees and volunteers are required to read this policy and sign the following declaration.

Name		
<input type="checkbox"/> Trustee	Position/role:	
<input type="checkbox"/> Volunteer	Team:	
Declaration	I have read and understood this policy, and I accept my responsibility to protect the confidentiality and personal information of all who use or provide TTN's services.	
Signature		
Date		