### 1. Introduction

The data that members provide on their Sheet & Tilmore Allotment Association (hereinafter referred to as 'STAA') application forms are kept in documents held and processed electronically. This means STAA is subject to the Data Protection Act.

Under the Act, the data that members provide are not classed as "sensitive data", and because STAA is a *not-for-profit* organisation that does not use CCTV, it does not have to register with the ICO (Information Commissioner's Office). Nevertheless, under the Act, STAA has some responsibilities to uphold. This document outlines the policies relating to these responsibilities.

For more information, the ICO website is here: <u>https://ico.org.uk/</u> and further details are available here: <u>https://www.gov.uk/data-protection</u>.

#### 2. What data is kept?

STAA only keeps data necessary for activities as noted in the Constitution, available on the STAA website <u>https://sheetandtilmore.weebly.com</u>:

An Excel database (see section 6 below) records:

- Members' first and last names
- Their plot number(s)
- Whether at Sheet or Tilmore
- Email address.

### 3. Accuracy

To maintain accurate records, members must keep their data up-to-date.

 Members can at any time request a copy of and update their data by email to the Membership Secretary: <u>membership.staa@gmail.com</u>

#### 4. What are the data used for?

The data are only used for legitimate STAA uses; these include but may not be limited to:

- Notification of STAA meetings & agendas, forms and other documents.
- Sending out news-letters and other information relevant to the allotments and the STAA website.
- To ensure annual membership fees correlate with the membership database
- To allow membership cards to be produced if they are set-up in the future.

#### 5. What are the data not used for?

The data are not used for or on behalf of:

- Any other organisation, any business or any person who is not a member of STAA.
- Also data are not disclosed to other STAA members or to third parties other than as stated below and in section 6.
- If for some unforeseen reason, data are to be disclosed to parties other than those stated the consent of effected member(s) is obtained prior to any such disclosure.

NOTE:

• STAA may have a responsibility to disclose information to bodies such as the Police to assist in their investigations and if necessary, this may be done without the knowledge of members.

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### 6. Who has access to the data?

- The Membership Secretary maintains the Excel database and provides the Treasurer with a copy to make sure that it corresponds with annual fees received.
- On the website, members can check that they are on the database by accessing a pdf file of plot numbers of plot holders who have paid their annual membership fee for the season noted on the pdf file.

NOTE:

- The Trading Secretary is provided with a paper copy of the database to ensure that only members, purchase items from the STAA shed.
- Master databases of **all** allotment holders are held by the clerks to the Sheet Parish and Petersfield Town councils. E-mails to all and e-mails to specific plot holders about their allotments are the responsibility of the clerks to the Sheet Parish and Petersfield Town councils. These databases may show who is or is not a member of STAA but are not available to STAA.

# 7. What happens when a member leaves STAA

Data for members who leave STAA are held for at most 6 months and then all associated documents and electronic files are deleted. The data are held for a short period in case a member who has recently left needs to be contacted.

If a member of the Committee who has the Excel database leaves either STAA or the Committee, the database is sent to the Committee member taking over membership responsibilities and the Committee member who is leaving then deletes their copy of the database.

# 8. How are the data protected?

The Data Protection Act recommends protection that is appropriate depending on the sensitivity of the data and the risks that might be incurred in the event of a security breach. The data kept are not classed by the Act as sensitive (examples of sensitive information are bank account details, ethnicity etc.). STAA considers that the risks of unauthorised data access or use are no greater than the risks of an individual providing the same data to a friend for social purposes. Nevertheless appropriate security software is used to prevent unauthorised access to the Excel database.

# 9. Who is responsible for ensuring that this policy is adhered to?

A nominated member of the Committee is responsible for ensuring that this policy is adhered to. The current nominee is shown in appendix 1.

# 10. Right of redress

In the event of a grievance, every STAA member has the right to independent review of how STAA has used their data with the aim of amicable outcomes and avoidance of litigation.

# 11. Contacts information

The STAA website has the contact details for committee members at:

https://sheetandtilmore.weebly.com/the-committee.html

Appendices follow ...

# Appendix 1

Member of the committee responsible for ensuring that this policy is adhered to and changed and updated as needed:

David Mogg, Plot 88, Sheet; membership.staa@gmail.com

End of Data Protection Policy