

# Data Security Policy and Procedures

Easton and Lawrence Hill Neighbourhood Management takes very seriously its duty to safeguard and protect the personal data it collects and uses from its users, volunteers and employees. This is not only to comply with data protection legislation but to give confidence that it is a charity which is trustworthy. This policy outlines the types of personal data ELH NM holds and how we keep it secure.

This policy should be read alongside the data protection policy, privacy notice and cyber security policy.

## Personal data collected on paper forms.

### Contact forms

Paper contact forms, containing signed consent to receive mailings, are entered into our Civi-CRM database on return to the office or as soon as possible after collected. Once entered into Civi-CRM, the paper form is securely shredded. These forms will not be left unattended in an empty car or unattended in any public place.

### Event registers

Paper event registers, where used, may contain personal data and consent, this information will be recorded in Civi-CRM for monitoring, the register is scanned and save to an encrypted file to record consent, and the paper copy is then securely shredded. These forms are not to be left in an empty car or unattended in any public place.

### Endowment Fund applications

Paper application forms are processed and held on file along with decisions, feedback and financial monitoring, and held on file in a locked cupboard. The files are retained for six years in line with reporting requirements. These files are not removed from the office.

### Personnel paperwork

Paperwork gathered during the recruitment process for shortlisting and selection are held in a locked cupboard and retained for six months in the event that the successful applicant does not pass the probation period and the position becomes vacant. After six months the paperwork is securely shredded. Employee and volunteer (including trustee information) personal information is stored in a locked cupboard, with access restricted to managers. Volunteer files are securely shredded one month after the volunteer becomes inactive. Employee files are securely shredded six years after the employee has left the organisation. These files are not removed from the office.

### **Personal data in magazine**

Content may include personal data, this is often unsolicited information provided by small community groups and so may contain a contact method which would be considered personal data. In this instance the information has been explicitly provided by the data subject who has approved the content prior to publication. ELH NM will at no point use the publication to publish unchecked facts or personal data without consent.

### **Personal data stored on electronic servers**

This data is accessed only by employees and is restricted by user permissions and is password protected. Inactive users are deleted within one month. No personal data is given to third parties.

### **Personnel data stored on electronic servers**

Personal data gathered during the recruitment process to allow shortlisting and selection is held electronically and retained for six months, after which they are deleted. Employee data is accessed only by managers and is restricted by user permissions and are password protected. Inactive users are deleted within one month. Personal data is only shared with third parties in the performance of a contract or where a legal obligation exists.

### **Legacy data stored on electronic servers**

ELH NM is the legacy of a New Deal for Communities programme, Community at Heart. As some of the work is still relevant, we hold the legacy data electronically which could include some personal information. This information is encrypted on an external hard drive, access to which is restricted to managers only. ELH NM have removed as much personal information as it can, however the amount of data is too vast to physically check each file, therefore this data will only be held as long as it is relevant, and will be securely destroyed after 12 months of inactivity.

### **Personal data stored on Civi-CRM**

Personal information provided on contact and registration forms are transferred to Civi-CRM if consent has been given. If consent has not been given, anonymous information in regards to attending an event may be entered. Personal data can also be added to Civi-CRM by the data subject by completing the 'Join Up Our Street' web form. ELH NM relies on Civi-CRMs' security processes to keep this personal data secure. Only employees have access to Civi-CRM, which is password protected. Inactive users are removed immediately. Remote access to Civi-CRM should only be via a secure, password protected, private Wi-Fi connection. All laptops, remotely based computers and mobile devices used to access Civi-CRM should be password protected and not left unattended in empty cars or public places.