

# **Solihull Borough Talking Newspapers Association (SBTNA) General Data Protection Regulation (GDPR) 2018 Policy & Procedures**

*SBTNA Procedures Updated 19th November 2023 at the request of the SBTNA Committee.*

## **Introduction**

The GDPR comes into force on 25 May 2018 and replaces the Data Protection Act.

The major emphases of the new Regulation concern transparency, accountability and the demonstration of compliance, and the provision of increased rights for the individual.

The Information Commissioner's Office (ICO) – overseen by the Department for Digital Media, Culture & Sport – continues to enforce data protection compliance.

# **POLICY**

## **Responsibility**

SBTNA holds personal data of listeners and of volunteers, and is therefore required to ensure that all such information is limited to that which is appropriate to, and commensurate with, the activities of the Association, and that all such information is held securely.

SBTNA is also required to respond to any requests from data subjects for disclosure of information held, and also to ensure that all information held is accurate.

All volunteers must be made aware of their individual role in ensuring SBTNA's compliance with the Regulation.

## **Regulation Exemptions**

As per the Information Commissioner's Office website (<https://ico.org.uk/>), SBTNA is not required to register with the ICO as a data controller; is not required to appoint a Data Protection Officer (DPO); nor is there any requirement to pay the data controller fee which helps to fund the operation of the ICO . These exemptions apply by virtue of SBTNA's being a not-for-profit organisation.

## **Review Process**

Although SBTNA is not required to appoint a formal Data Protection Officer (DPO), the committee will strive to designate a member to assume the role of a Data Protection Manager (DPM).

The DPM's responsibilities will be to:

**keep the Association's data related processes under continual review,**  
**report to the committee any concerns or processes requiring change,**  
**monitor for any updated legislation requirements and make sure they are implemented,**  
**disseminate information and/or guidance to volunteers,**  
**deal with any requests for disclosure of information, including hard copy privacy notices,**  
**manage the reporting of any data breaches, and**  
**deliver a formal statement concerning GDPR compliance at the SBTNA AGM.**

## **Security of Information Held**

All information held will be the minimum required to fulfil SBTNA's service delivery, and is therefore provided under the lawful basis of contract so individual consent is not required. Data will be deleted when the service is no longer being provided.

All information will be stored securely. Hard copies of data will be held in lockable storage or a key-coded safe, which also stores all cabinet keys, apart from one key issued to The Core's Post Porters and, currently, a second copy held the Distribution Officer who opens the post contained in a locked drawer. The digital data will be held in SBTNA's password protected computer, which has no internet connectivity and is not available for use by anyone other than SBTNA volunteers or trustees. The password will be changed at irregular intervals, particularly after a change in personnel with access.

Any computer generated hard copy reports will contain the minimum amount of information required for purpose. Addresses will only be included where essential, such as arranging for home visits.

### **Communication With Listeners**

Individuals' rights under GDPR will be advised to listeners across all contact media: this includes orally (either face to face or via telephone), recorded information on memory sticks, hard copy notice on request, and SBTNA website.

Listeners will be able to request confirmation of information held about them at any time.

### **Volunteers**

SBTNA will also keep secure all personal information held about volunteers. This does not preclude volunteers sharing their contact information with each other.

Volunteers will be kept informed of the requirements and responsibilities laid to them under the terms of the legislation.

## **PROCEDURES**

### Notification of new listeners.

Hard copy of initial notifications, from whatever source, should be stored in the locked cupboards or the safe until the Saturday morning team add the details to the computer record. Once entered onto the database and the required address labels are printed and checked, the hard copy is to be shredded.

### Correspondence from listeners.

This should be stored in the locked cupboards or the safe until the Saturday morning team takes whatever action is required. Any papers not needed after action is complete are to be shredded. The Core's Post Porters hold a key to the locked correspondence drawer and place all post in there as the Roller Room where the drawer is situated is used by other Core Agencies.

### Deleted listeners

All details – apart from the wallet number – are to be deleted from the computer database when a listener stops receiving the service. All address labels from newspaper and magazine wallets are to be shredded.

### Printed computer reports.

Only essential reports to be printed. Most reports are generated automatically, but any that get printed unnecessarily are to be shredded. All lists to be shredded when action complete.

Birthday list – to be placed in the safe

Home Visit Records Forms – to be placed in the safe or sent electronically to the Safeguarding Officer

Unsent wallets list – to be passed to Roger

## Home Visiting

Volunteers undertaking new listener home visits should explain SBTNA's privacy policy, and the methods of contact if they have any queries. The Home Visit Record should be noted that the explanation was given and understood.