



Gospel4Grampian

Scottish Registered Charity SC040454

Data Protection Handling Procedure

Version: 1.0
Authors: Jim Buchan
Reviewer: BOT Members
Date: 12th May 2018
Date for Review: TBC



Introduction

In order to function, Gospel4Grampian has nominated people who manage personal data to discharge their duties. This document provides an overview of the procedure for data handling that the Gospel4Grampian Board of Trustees has agreed. All data stored and processed must remain accurate and where the data is personal must be processed according to the UK and EU data 8 protection principles as listed in the Gospel4Grampian Data Protection Policy.

Data handlers (users) will be allocated a Gospel4Grampian O365 domain account which has been configured to meet the requirement of their duties. In the event that a user is unable to access this system, arrangements will be made through the Gospel4Grampian office to provide access by producing up to date printed copies of the data as necessary.

Any Gospel4Grampian data handlers will be required to sign a declaration that they understand the principle of data protection and agree to adhere to this Data Handling Procedure.

All matters of concern must be addressed to the Gospel4Grampian Data Protection Officer.

What data will be held?

Data handlers will be required to confirm in writing the data required in order to function. These details will be reviewed by the Gospel4Grampian Data Protection Officer to identify any sensitive data. An appropriate O365 Group will be created to hold the approved data. The data handlers will then be given the necessary access to record and maintain the data.

How will the data be collected?

Any personal data needed will be collected from the data subjects by asking them to fill in a form (paper or electronic) which will include a statement about what data is being collected and how it will be processed. There will also be provision for the subject to confirm their dated and signed consent for Gospel4Grampian to hold the data and use it in the execution of its own business. The statement will include a commitment that Gospel4Grampian will not pass the data provided on to any other individual or body unless specifically required in the discharge of its duties or for legal purposes. Paper submissions will be scanned and archived digitally in O365 and original copies retained in a secure cabinet.

Any data collected prior to the introduction of this procedure will be shared with the data subjects when they will be required to confirm its accuracy and provide consent for its storage and use. Gospel4Grampian will endeavour to complete this process within one year of the introduction of this procedure.

How will the data be kept up to date?

Provision will be made for data subjects to have the option to view all data held about them upon request. In any case, the data handlers will regularly ask the data subjects to review the data stored and update/correct it as necessary. This will be done on a three yearly cycle or on occasions when data is being used for some purpose.



What if a data handler does not want to maintain the electronic data set?

Where a data handler does not wish to maintain the data electronically or is unable to do so, a manual procedure will be used where the data will be passed to the Gospel4Grampian office to be added to the electronic archive. Paper copies will be made available to the data handler when necessary. These copies, whether amended or not, will subsequently be returned to the Gospel4Grampian office for action as necessary. Data handlers will be made aware of their responsibility to manage printed data copies, keeping it secure and never to disclose it to any unauthorised third party.

Managing Printed Copies of Personal Data

Printed copies of personal data shall not be created unless this is necessary for the individual using the data to do their work.

Principles for managing paper copies of personal data:

- Gospel4Grampian Secretary/Data Handler to provide a printed copy of data required
- Printed copy given to the data handler in order to complete task
- Data handler to manage the data according to data processing principles
- Data handler will notify Gospel4Grampian Secretary about any inaccuracies found.
- When no longer needed any printed personal data should be either returned to the Gospel4Grampian secretary or destroyed.
- Printed personal data lists should never be left unattended or disposed in recycling or general waste system.
- Printed data sets should never be kept any longer than is necessary to complete the task.

Privacy Policy

The privacy policy will be produced and made available to all data subjects and individuals who have access to and responsibility for managing personal data. This document will be published on the G4G website and displayed in the G4G office.

Procedure for dealing with an abuse of personal data

The Board of Trustees will review the circumstances surrounding any potential abuse and document what happened and what steps have been taken to prevent recurrence and any other relevant information.

In the event that an abuse of any personal data has been identified, the Data Officer (Secretary to the Board of Trustees) will complete a Data Protection Breach Notification and pass it to the Information Commissioners Office.

Data Storage System

All data required will be stored in the Gospel4Grampian O365 domain account. An O365 Group will be setup for each data storage requirement with the minimum number of users allocated read and/or write access as needed.

- O365 OneDrive is the primary file storage system which will be over-laid with O365 Groups as necessary.



- For each set of data there will be at least two authorised users, one being the Gospel4Grampian secretary and the other being the data handlers who are charged with responsibility for the day to day maintenance of the data.
- O365 web apps will be used to maintain the data files. These will include Word and Excel.
- Most users will have a web only license allocated to their account.

Data Sets and Associated Data Maintainers

Note: The Secretary will have full access to the following data sets.

Data Set	Data Maintainer(s)	File Store Requirements
Gosp4Grampian Members Database	BOT Secretary	Excel in O365
Donation & Gift Aid Records	BOT Treasurer	Excel/Word in O365
Formal email distribution lists	BOT Secretary	O365/Outlook/Mail Chimp
Safeguarding Register	TBC as Gospel4Grampian does not have one of these for now (May 2018)	Word/Excel in O365

Detailed breakdown of data needed for each Data Set

The following is a summary of the data fields needed for each data set. These data sets will to be confirmed by each group leader or data set owner – as a general principle Gospel4Grampian will not store more than the minimum data which is needed to do its work. Data duplication should be avoided in order to provide a “single point of truth” which can be maintained/updated as necessary. Any data held will be audited on a three yearly basis to confirm its accuracy. An audit trail of changes made will be maintained to show additions, modifications and deletions.

Gospel4Grampian Members Database

Type of access	Name/office
Read/Write	BOT Secretary
Read Only	BOT Members
Field	Comment/Type
Title	Mr, Mrs, Miss, Ms, Dr etc.
Full Name	Text
Address 1	Text
Address 2	Text
Address 3	Text
Post Code	Post Code
Date Joined	Date format
Phone number	Number
Mobile Phone	Number



Email Address	email
Gift Aid	Date

Gift Aid Records and associated letters

Type of access	Name/office
Read/Write	BOT Treasurer
Read	BOT Members
Field	Comment/Type
Title	Text
Full Name	Text
Address 1	Text
Address 2	Text
Address 3	Text
	Text
Post Code	Text
Financial details (giving)	Currency
letters	Text

BOT minutes

All meeting notes and minutes to be created and stored in a Group Shared folder in the O365 domain. Any copies emailed to group members will be in PDF format to prevent unauthorised alteration. All BOT members to be offered an account and training in its use.