

Data Protection Policy

Protecting personal and critical data

Author: Russell Cosway (Gydeline Ltd)

Owner: John Scott (Bees United Membership Secretary)

1 Table of Contents

1	Table of Contents.....	2
2	Introduction.....	3
2.1	Purpose.....	3
2.2	Scope.....	3
2.3	Key Principles and Definitions	3
2.3.1	Roles and Responsibilities	3
2.3.2	Applicable Regulations & Standards.....	3
3	Policy Statements.....	4
4	Implementation.....	5
4.1	Approval and review	5
4.2	Communications.....	5
4.2.1	Externally.....	5
4.2.2	Internally.....	5
4.3	Accountability.....	5
5	Document Control.....	6
6	Bibliography.....	6

2 Introduction

2.1 Purpose

Ensure that a culture of data protection and sound information management is embedded at the heart of the organisation.

2.2 Scope

All data gathered, held and processed by Brentford Football Community Society Ltd (t/a Bees United), both physical and electronic.

Exclusions: For clarity, all records controlled by Brentford Football Club are not within scope.

2.3 Key Principles and Definitions

2.3.1 Roles and Responsibilities

- Accountable Person (owner) – Define and seek approval of this policy, ensure all are familiar with responsibilities and procedures (see statement 3)
- Information Director – primary contact for all data protection, data privacy and information management matters and ensuring defined organisational measures are followed. John Scott is Information Director at time of approval
- Technology Director – responsible for ensuring all technological measures are specified, implemented, maintained and monitored. John Scott is the Technology Director at time of approval.
- All Directors – Understand the policies and ensure procedures are followed and data is protected
- Workers – Understand reasons for security measures and the consequences of not following process and procedure correctly and consistently

2.3.2 Applicable Regulations & Standards

- [Data Protection Act \(GDPR\)](#)
- [Privacy and Electronic Communications Regulations](#)
- [Computer Misuse Act](#)
- [Digital Economy Act](#)
- [National Cyber Security Centre – Cyber Essentials](#)
- [ISO 27001 – Information Security Management Systems](#)

3 Policy Statements

1. All directors, and any workers, are regularly updated and reminded of the organisations rules, policies and their responsibilities related to achieving and maintaining compliance.
2. Deliberate or reckless failure to apply policies, process and procedures will result in the application of the Disciplinary Process.
3. The requirements of the Data Protection Act, and any related information legislation, are met and, if possible, exceeded.
4. An Executive Director will be appointed as the organisations Information Director and is deemed the "Accountable Person"
5. The Accountable Person may, and should, nominate another individual to support Data Protection activities and to deputise for them
6. The Accountable Person notifies the Information Commissioners Office of the organisations handling of personal data, if required.
7. Personal data will only be stored on solutions approved by the Accountable Person
8. Reasons for collecting, storing and processing personal data are approved by the Accountable Person
9. Collection of data is only made from reliable and reputable sources approved by the Accountable Person.
10. Data is only accessed by those formally authorised to do so by the Accountable Person
11. Data entry is assured for accuracy in-line with the value to, and potential impact on, the business and the data subject
12. Personal data is not shared with any third parties without the explicit consent of the data subjects involved
13. Procedures are established and maintained to allow data subjects to access, amend, erase and restrict processing to the data that the organisation holds about them promptly and completely.
14. All organisational information which is:
 - a. stored as paper files is secured in locked cabinets of approved persons
 - b. stored electronically is held in Microsoft 365 OneDrive Cloud-based storage solution which access rights managed by the Accountable Person.
15. All personal information is stored within the European Economic Area
16. Information retention will be enforced according to the rules defined in the **Data Retention Policy**
17. Third parties which process personal data on our behalf are checked for Data Protection compliance equivalent, or exceeding, our own measures
18. Technical measures are implemented that ensure security of personal information at all times.
19. Any data-privacy breaches or suspected security incidents are reported, recorded and investigated following the **Breach Management Procedure**
20. Appropriate and timely education, training and guidance is provided to ensure all directors and workers have the required skills, qualifications and resources to provide services to the required standard

4 Implementation

4.1 Approval and review

This policy has been agreed and adopted by the BU board

A review will be undertaken every 12 months or directly after a Breach.

4.2 Communications

The policy will be communicated as follows:

4.2.1 Externally

- Reflected in Privacy Notice, [link to be added](#)
- Induction of 3rd party suppliers

4.2.2 Internally

- New director induction process
- Regular director training
- Discussion and reminders in meetings

4.3 Accountability

The Bees United Chairperson (Chair) is accountable for ensuring that this policy is fully implemented, followed and audited. Stewart Pervis was Chair at time of approval

5 Document Control

Key Details

Doc Ref.	POL-DataProtection-D02.docx	Date	5/26/21
Title	Data Protection Policy	Owner	Bees United Chair
Status	DRAFT 0.1	Audience	Directors, volunteers, suppliers
Purpose	Protecting personal and critical data	Tags	Personal, data, protection, privacy

Version History

Version	Date	Author	Details
D01	25/5/21	Russell Cosway	Initial Draft
D02	17/6/21	Russell Cosway	Refinements to role holders
D03			
V01			

Approval

Name	Role	Job title	Contact Details
Stewart Purvis	Approver	Chair	name@company.com
John Scott	Responsible	Technology Director	name@company.com

6 Bibliography

End of Document

Produced: 01/02/2023 13:52:00



Gydeline Ltd is a company limited by shares, registered in England and Wales with Companies House, No. 09559617

Registered Office: North Wing, Norway House, Summers Street, Lostwithiel, Cornwall, PL22 0PT

VAT No: GB 226 0817 24

Telephone: 03330 095260

hello@gydeline.com

www.gydeline.com