

Bexley accessible transport scheme

PRIVACY POLICY

The aim of this privacy policy is to ensure an understanding of how Bexley accessible transport scheme is committed to protecting and respecting your privacy. It sets out the basis on which any data we collect from you, or that you provide to us, will be processed, disclosed, retained and protected by us. This private policy should be read in conjunction with our membership policy – available to view-download from the Bexley accessible transport scheme website or contact email- dpo@bexleyct.co.uk .

Bexley accessible transport scheme (BATS) are required to comply with the provisions of the general data protection regulation (GDPR) May 2018, in relation to how we handle any personal data which we obtain from you and gives individuals the right to know what information is held about them.

Personal data

Member's personal data is any information relating to a person who can be directly or indirectly identified from the information given. This includes but is not limited to – parents-carers names, clients, members, individual's personal details, postal/email address, telephone number, child/young person's details and ethnicity, medical information. All information you voluntary submit to us is held securely in accordance with general Data protection regulation (GDPR). BATS will:

- Respect our members individual rights
- Be opened honest with individuals whose data is held
- Regularly assess and evaluate or methods and performance in relation to handling personal information.

Definitions and Roles

The GDPR applies to Data controllers, Data processors and Data officers.

- The Data controllers (the Trustees BATS) determine the purpose and means of processing personal data.
- The Data processors (the trustees/management committee/staff/volunteers of BATS) are responsible for processing personal data on behalf of a controller.
- The data officer (CEO for BATS) is responsible for:
- Notifying the information commissioner of data, it holds if requested and handling subject access requests
- Briefing the Trustees/management committee/staff/volunteers on GDPR responsibilities and provide training, support and supervision regarding personal Data, so that they can act legally, confidently and consistently.
- Reviewing GDPR and related policies
- Approving GDPR related statements on publicity materials letters

All trustees/management committee/staff/volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. Significant breaches of policy will be handled under our disciplinary procedures.

We may use the information we hold about you in the following ways to:

- Provide a service, as well as information related to those services
- Provide notification of events and relevant updates from selected organisations
- Provide you with personalised experience
- Improve our understanding of how our service is used
- Contact our members for feedback, responding to enquires and consultations
- Make and monitor grant applications

Voluntary submission of personal data

You can voluntarily submit your personal data by:

- paper copy (including membership, enquiry and feedback forms)
- email (generic or BATS management committee personal email address)
- on-line via the BATS website forms

In voluntarily submitting your personal data to us. We may process and in particular may disclose your personal data anonymously in accordance with our charity constitution to:

- enable us to provide a service to you
- carry out any monitoring or statistical analysis
- fulfil our contractual obligations such as grant monitoring and consultations
- use in local Authority/Government consultations
- contact you directly about forthcoming events including workshop or consultations
- Inform you of other services, providers and organisations which we believe, may be of interest or benefit to you.

We will not, without your permission, disclose your details to other irrelevant selected third parties although we are required to follow safeguarding procedures when appropriate.

What information we collect and record

Please refer to our membership policy for a list of information that is requested when joining BATS, we may collect other types of information including:

- personal data that members/non-member voluntarily submit so that we can provide you with a more detailed service such as enquires or complaints
- anonymous data that is collected from members for purpose of monitoring and consultations
- feedback from events such as school visits, seminars and workshops

BATS membership and events are provided with fee. Therefore, we may request any financial/card details/bank account information from our members. This information is retained on our banking system Lloyds bank and in accordance with their data protection policy.

Access to your personal data (subject access requests)

You have a right to request:

- a copy of your personal data held by us in our records
- BATS to amend any personal details we hold about you
- BATS to remove/erase any personal data we hold about you at any time.

Subject access requests must be in writing or by email dpo@bexleycy.co.uk and will be handled by the data officer within the required legal time limit of 40 days. All trustees/management committee/staff/volunteers are required inform the data officer of anything which might be a subject access request without delay. Where the individual making a subject access, request is not personally known to the data officer their identity must be verified before handing over any information. Provision of such information is free of charge, but may be subject to a payment fee if the demand is excessively repeated.

Website and cookie policy

Please refer to our website disclaimer for more information. We cannot be held responsible for the privacy of data collected by external links to websites not managed by BATS. The BATS website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information and provide anonymised tracking data to third party applications like google analytics. As a rule, cookies will make your browsing experience better. You may prefer to disable cookies on our website and on others however this may affect your navigation around the site. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser or taking a look at the 'about cookies' website which offers guidance for all modern browsers.

Please note that our external links to other organisations and websites may also use cookies, over which we have no control.

Storing your personal data

Information and records will be stored securely, whether on paper, on a computer, or record on other material, and will only be accessible to authorised employees, trustees, management committee and volunteers and the individual to whom the information relates. The data that we collect from you may be transferred to and stored at a destination outside the European Economic area (EEA). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this private policy.

We protect your information using appropriate technical and administrative security measures to reduce the risk of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are passwords, firewalls and data encryption.

Any recorded information on members, volunteers and employees will be:

- Kept in locked cabinets, one drive or cloud
- Protected using passwords if kept on computer or encrypted if appropriate,
- Destroyed confidently if it is no longer needed, or if an individual request

Confidentiality

All information provided by parent/carers and individuals will be treated in strict confidence. BATS do not rent or sell mailing details to any third party and will not pass on your data to any irrelevant party without your prior consent. Refer to our membership policy for more information on whom we share your personal data with. Confidential information is defined as verbal or written information, which is not meant for public or general knowledge and information regarded as personal by member, trustees' staff or volunteers.

Retention

We retain your personal information as long as it is necessary (please see retention policy) and relevant for our operations. In addition, we may retain personal information from members to comply with national laws, prevent fraud, resolve disputes, troubleshoot problems, comply with grant applications and monitoring and take other actions permitted or required by applicable national laws.

Erasing (deleting) your data

The GDPR introduces a right for individuals to have personal data deleted/erased. The right to erasure is also known as 'the right to be forgotten' Members and individuals can make a request for

erasure in writing or via email and BATS will respond within one month. The right is not absolute and only applies in certain circumstances.

Data breach

Data breach is a breach of security leading to the accidental or awful destruction, loss, alteration unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. Data breaches must be reported to the UK information commissioner

Offices (ICO) who are responsible for implementing and overseeing the general Data protection regulations in the UK. It is the responsibility of the data for BATS to report any appropriate data branches.

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