



## GENERAL DATA PROTECTION REGULATION POLICY

### INTRODUCTION:

Tir Coed holds certain information about living individuals which is defined as personal data under the The General Data Protection Regulation 2016/679 (**GDPR**). This policy sets out the basis on which any personal data collected from an employee, contractor, referral or volunteer will be used by Tir Coed. Tir Coed's aim is to adhere to the General Data Protection Regulation 2016/679 (**GDPR**).

### RESPONSIBILITIES:

This Policy will be brought to the attention of everyone who works with and for Tir Coed, including Board members, staff, contracted Service Providers and volunteers.

Personal information must be:

- Used lawfully and accurately;
- Used only for specified and compatible purposes;
- Kept secure, accurate and up to date;
- Relevant, not excessive and retained for no longer than necessary;
- Used in accordance with the rights of the individual whose personal information is being held.

### SPECIFIC WORKING PRACTICES AND COMMITMENTS:

1. Consent to collect personal data shall be lawfully and informatively collected at the start of each project or contract by means of a fair processing notice.
2. The personal data collected will only be that which is necessary for the project/contract for the duration of the project/contract.
3. Tir Coed recognises that research documents such as published statistics are within the public domain and are therefore not required to be held in a secure manner.
4. Completed project/contract data will be kept as archive material. Therefore all data will be accurate to the time that the project/contract was live. Tir Coed seeks to obtain accurate and clear data for the duration of the live project/contract.
5. All projects/contracts or research documents that contain personal data will be open for the client to inspect at their request.

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6. Staff records and all personal data will be held within secure filing cabinets within the head quarter premises of Tir Coed.
7. Personal data will only be accessed by those members of staff that are working on the project/contract at the appropriate time.
8. At all times and in all places the Tir Coed staff will retain the confidentiality of personal records.
9. Tir Coed staff will ensure that data held electronically and equipment which holds electronic data, such as laptops, is never left vulnerable to theft, particularly in public places. Any personal data held will be electronically will be password protected.
10. Disposal of personal data:
  - a) Paper files to be shredded;
  - b) Electronic files to be deleted.
11. The consent of a project participant (or, in the case of minors, the participant's guardian) to use their name and/or photograph for Tir Coed publicity or promotional purposes will be obtained in advance. This permission will be in written form and signed for.
12. Personal data will not be forwarded to any third party unless specific permission has been given.
13. All personal data will remain within the United Kingdom.
14. Any individual supplying personal data will be informed where the data will be kept, the duration it will be held and why it is being stored.

## DOCUMENT RECORD RETENTION POLICY:

File Type:	Retention Period (in years)	Secure Destruction Procedures
<b><i>Accounting &amp; Finance:</i></b>		
Annual report and Audited Accounts (signed)	Permanently	n/a
Accounting records	6 (from year's end)	Shredding
Budgets	6	Shredding
Internal financial reports	6	Shredding
PAYE	6	Shredding
Payroll	6	Shredding
Annual Report & accounts (unsigned)	6	Shredding
Banking records	6	Shredding
<b><i>Contracts:</i></b>		
Private sector funding	6	Shredding
Public sector funding	8	Shredding
Personal profile & survey forms	8	Shredding
<b><i>Human Resources:</i></b>		
Job applications & interview records	12 months after notification	Shredding
Employment terms, conditions & contracts	6 (after employment ends)	Shredding

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Personnel & training records	6 (after employment ends)	Shredding
Travel & subsistence claims	6	Shredding
Annual leave forms	2	Shredding
Payroll and wage records, including details on expenses	6 (from the year end)	Shredding
DBS reports	2	Shredding
<b><i>Beneficiaries</i></b>		
Enrolment Forms	1 (after contractual obligation ends)	Shredding
Photographs	1 (after contractual obligation ends)	Shredding
Registers	1 (after contractual obligation ends)	Shredding
Monitoring and evaluation forms	1 (after contractual obligation ends)	Shredding

#### TIR COED DATABASE – COMPLYING WITH THE GENERAL DATA PROTECTION REGULATION

This section summarises the steps taken to comply with the GDPR in regards to the Tir Coed participant database, which predominantly stores digital transcriptions of monitoring and evaluation forms and qualitative feedback from training course participants.

Sensitive personal data will be anonymised via the following amendments:

Date of birth – Participant age is now recorded via age category

Postcode – Participant location is now recorded via their three- or four-digit area code.

#### MONITORING:

Tir Coed will monitor the application of this policy on a six monthly basis to ensure that its practices comply with the requirements of the Policy. Tir Coed staff will report on any major issues arising in relation to the policy in their regular reports to the senior management team.

#### PRIVACY NOTICE:

Tir Coed in compliance with GDPR will clearly state on all enrolment forms, contracts and data requests how Tir Coed process their personal data in a concise, transparent, and intelligible way appropriate to the target audience. This information will be easily accessible and individuals will sign to acknowledge receipt.

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**DATA SUBJECT RIGHTS POLICIES –**

Tir Coed will inform all data subjects how they can access, erase and restrict processing of their data on all enrolment forms and contracts.

**DATA PROTECTION OFFICER (DPO) POLICY –**

Tir Coed has assessed whether it needs to appoint a DPO and has deemed this unnecessary due to the size and amount of personal data collated by the organisation. All data collected by Tir Coed is a legal requirement under contractual obligations from funders. The GDPR policy sets out the processes for ensuring all staff, board members and freelance staff adhere to GDPR legal requirements. Senior management will be responsible for ensuring these procedures are adhered to and legally obliging.

**STAFF TRAINING POLICY –**

Tir Coed have delivered company-wide GDPR training to staff and will repeat every year to achieve a company-wide staff awareness of data protection as well as high level knowledge for specialist staff.

**INFORMATION SECURITY POLICY –**

Tir Coed password protects electronic folders holding personal data. Electronically stored Personal data will be deleted in accordance with the Tir Coed record retention policy.

**LAST REVIEWED****DATE:****SIGNED:****POSITION:****SIGNED:****POSITION:****on behalf of Tir Coed Board of Directors**

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