



Data Protection Policy

This document represents the Data Protection Policy adopted by Men's Shed Guernsey (the "Men's Shed") to ensure compliance under the relevant Data Protection legislation operating in Guernsey from time to time. The Policy takes into account the requirements under the new The Data Protection (Bailiwick of Guernsey) Law, 2017 (the "DP Law") which is being transposed into Guernsey law and is deemed effective, alongside similar EU legislation, on 25th May 2018.

Data Protection Policy

As with all organisations in the Bailiwick of Guernsey, and indeed elsewhere, which hold personal data on individuals, it is incumbent on the Men's Shed to adhere to relevant rules and legislation in force from time to time to ensure suitable protection is provided to the individuals, generally known as Data Subjects, in the security of confidential and often sensitive personal data held by the Men's Shed for legitimate operational reasons.

The Guernsey DP Law is comprehensive and runs to some 265 pages. Whilst the DP Law is relevant to the Men's Shed's activities, the areas relevant to the Men's Shed are thankfully reasonably limited in practice due to the nature of the Men's Shed's activities, and the purpose for which personal data is required and used.

This document sets out the general Principles of the DP Law, and their relevance in the context of the Men's Shed's business, and the Procedures under which the Men's Shed and its officers will collate and handle personal data when required to do so.

Any breaches arising under these procedures at any time, whether inadvertent, mistake or advertent must be reported immediately to the Responsible Officer to consider any corrective action required (and onward reporting if appropriate).

Responsible Officer: James Rouse
Email: jim@makerspace.gg
Tel: 07911 750121

Introduction

Organisations such as men's sheds and makerspaces are required to hold at least a limited amount of personal data that is required for safe operation within local regulations and insurance policy requirements. The data likely to be held is typically restricted to data on the individual members registered to use the Men's Shed, such data being required for registration and sometimes health/well-being purposes.

The overriding principles of Data Protection equate in simple terms to:

1. Only hold personal data required for the specific purpose
2. Keep the data secure
3. Allow access on a need-to-know basis
4. Provide data subjects (the members) access to their data upon proper request
5. Maintain the data only as long as necessary, then destroy (unless overriding reasons of law).

There is no separate Data Processor. In simple terms, personal data held at any time is limited to the following information, usually taken from the member when registering through the online Registration Form:

- 1) Full name
- 2) Address
- 3) Date of Birth
- 4) Telephone number(s)
- 5) Email
- 6) Relevant medical conditions and care requirements
- 7) Emergency contacts

No further information is required to enable registration to take place.

All of this personal data is subject to proper handling under these procedures.

Data Handling Arrangements

The Men's Shed handles individual data as follows:

1. Member completes the online Men's Shed Registration Form which includes relevant personal data per the above;
2. The registration form includes wording to the effect that the Men's Shed can hold the personal details of the member, and hold these details in a database in order to manage access to the facilities and equipment.
3. The member list may be shared with the Men's Shed Board as needed.

The personal data is not otherwise shared outside the Men's Shed. The membership database is held securely on the membership management server using up-to-date encryption protocols and any sensitive information such as medical information is held encrypted and not in plain text.

Data Subject Requests

Under the DP Law, each Data Subject (members in this instance) are entitled to ask for copies of the personal data held on them by the Men's Shed. This has never happened to date, particularly as the data is limited and in general has been provided by the member in the first place.

However, the DP Law does give the individual the right to request sight of the data held on them, in which case the Men's Shed is obliged to provide copies of the relevant data within one month of the request being received.

Data Portability

The DP Law provides for Data Subjects to request any data held to be returned to them or transferred to another controller. In the simple context of the Men's Shed, such portability is unlikely to occur, even where members transfer to another equivalent organisation, as the new organisation would start the process again by for instance requesting a new registration.

Data Subject leaves the Men's Shed

If the member leaves the Men's Shed for whatever reason then the data held on that individual is no longer required, and will be destroyed.

Data Breaches

Due to the simple nature of the Men's Shed data requirements, and the nature of the personal data held, it is unlikely that breaches of data security will occur. However, the Men's Shed and its board cannot be complacent in this regard, and must take data security and processes seriously at all times.

Certain types of data breach must be reported to the Data Protection authorities in Guernsey (the Data Protection Authority or DPA), but this is only required in cases where the breach could result in discrimination, damage to reputation, loss of confidentiality or perhaps social disadvantage. The responsible officer will make a determination on a case by case basis.

The DPA will also handle any complaints raised by a Data Subject on the handling by the data controller of any personal data held on that individual.

Data Processor

Currently the Men's Shed does not use or indeed have a requirement for a separate Data Processor to process the personal data held on individuals.

Information Provided to Data Subjects (members)

The DP law requires certain information to be given to Data Subjects so that those Data Subjects are properly informed on relevant matters. This information has been included in the online Men's Shed Registration Form for ease of reference. The important point to remember is that the members have rights over access to and security of their personal data, and can request access to their data,

make formal complaints about the handling of their data, and have the right for the data to be deleted when no longer required (the Right to be Forgotten).

The 'Shed's Responsibility

The Men's Shed and its trustees acknowledge the responsibilities incumbent on all of them in connection with the holding and processing of personal data as required under the DP Law. This Policy will be reviewed on a regular basis, and amended in the light of changes in the DP Law or general practice.