

Data Protection Policy

Policy information	
Organisation	Compassion Kadampa Buddhist Centre, 2 Station Road, Newcastle upon Tyne NE3 1QD
Scope of policy	This policy applies to all functions and actions performed by Compassion Kadampa Buddhist Centre Newcastle, and will be followed by everyone involved with the organisation.
Policy operational date	The policy operates from 25 th May 2018.
Policy prepared by	Neil Nicholas
Date approved by Board/ Management Committee	This policy has been approved by the Directors of Compassion Kadampa Buddhist Centre Newcastle
Policy review date	The policy will be reviewed by 25 th May 2021.

Introduction	
Purpose of policy	<p>The purpose of the policy is to -</p> <ul style="list-style-type: none"> • comply with the law • following good practice • protect volunteers, staff and people who attend meditation classes and retreats

<p>Types of data</p>	<p>The types of data Compassion Kadampa Buddhist Centre Newcastle handles includes -</p> <ul style="list-style-type: none"> The contact details for the people who attend our classes The email addresses of people who subscribe to our newsletter via our website The contact details of people who are on advanced study programs, and of volunteers The names of our donors and the amounts donated The contact details and dietary requirements for people who attend our residential retreats Details on residents of the property to help perform the legal functions of a landlord, such as names and previous addresses.
<p>Policy statement</p>	<p>Compassion Kadampa Buddhist Centre Newcastle is committed to -</p> <ul style="list-style-type: none"> • complying with both the law and good practice • respecting individuals' rights • be open and honest with individuals whose data is held • providing training and support for staff who handle personal data, so that they can act confidently and consistently
<p>Key risks</p>	<p>Compassion Kadampa Buddhist Centre Newcastle is aware of the key risks in holding this data.</p> <p>The organisation understands the risk of information being seen by unsuitable people and so the written data will be kept securely in locked areas with only authorised people having access to it. Electronic data will be kept in secure IT systems.</p> <p>Staff understand the importance of not disclosing personal information to unsuitable people.</p> <p>There is little risk of individuals being harmed through data being inaccurate or insufficient.</p>

Responsibilities

<p>The Board / Company Directors</p>	<p>The Directors Compassion Kadampa Buddhist Centre Newcastle have overall responsibility for ensuring that the organisation complies with its legal obligations.</p>
<p>Data Protection Officer</p>	<p>There is no legal need for a full time Data Protection Officer at Compassion Kadampa Buddhist Centre Newcastle as the organisation is not a public authority and the core activities do not require large scale, regular and systematic monitoring of individuals or large scale processing of special categories of data or data relating to criminal convictions and offences.</p> <p>Neil Nicholas and Jeanette Boldrini, the Administrative Director for Compassion Kadampa Buddhist Centre Newcastle, have overseen this document and the implementation of GDPR compliance.</p>
<p>Employees & Volunteers</p>	<p>Staff and volunteers at Compassion Kadampa Buddhist Centre Newcastle Centre will read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.</p>

Enforcement	If an individual believes the organisation has not complied with this Policy and not acted in accordance with the relevant legislation they can discuss the issue with Neil Nicholas, the Resident Teacher and the Directors of Compassion Kadampa Buddhist Centre Newcastle.
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Security	
Details	<p>Compassion Kadampa Buddhist Centre Newcastle keeps written data in a secure draw which is locked when not in use.</p> <p>Electronic data (email, mobile numbers and addresses) from our class registration process are collated via an application called App Sheet and stored online using Google Drive. Access to both App Sheet and Google Drive are password protected.</p> <p>The email addresses for people who have subscribed to our newsletter are held within our online 'mail chimp' account. Access to this account is password protected.</p>

Data recording and storage	
Storage	<p>Information will be regularly checked to make sure it is relevant and will be destroyed if it isn't. For example: After a course the details of the people who have booked will be destroyed</p>

Right of Access	
Responsibility and procedure for making request	<p>Individuals have a right to access any personal data relating to them which are held by the organisation. Any relevant individual wishing to exercise this right should apply in writing to the Administrative Director for Compassion Kadampa Buddhist Centre Newcastle, 2 Station Road, South Gosforth, Newcastle Upon Tyne NE31QD ; or by emailing admin@compassionmcentre.org</p> <p>Right of access requests are handled within the legal time limit, which at the time of writing is one month.</p>
Provision for verifying identity	Where the person managing the access procedure does not know the individual personally who has made the right of access request they will have to supply extra information for provision for checking their identity before receiving any information.
Charging	<p>The information will be provided free of charge.</p> <p>However the organisation can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. The organisation may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.</p>
Procedure for granting access	If the request is made electronically, the information will be supplied in a commonly used electronic format.

Transparency

Commitment	<p>When an individual supplies data, the organisation will try to the best of their ability to make sure the person is aware</p> <ul style="list-style-type: none"> • for what purpose their data is being processed • what types of disclosure are likely, and • how to exercise their rights in relation to the data
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Lawful Basis	
Underlying principles	<p>The organisation will record the lawful basis for the personal data that is held. This data will be kept to fulfil all legal requirements of the organisation.</p>

Employee training & Acceptance of responsibilities	
Induction	<p>All employees and volunteers who have access to any kind of personal data will have their responsibilities outlined during their induction procedures, and will show that they have understood the issues and procedures.</p>

Policy review	
Responsibility	<p>Neil Nicholas has responsibility for carrying out the next policy review in relation to GDPR and compliance. This will be completed by 25th May 2021.</p>