

General Data Protection Regulation Policy

Summary

Move Free CIC aims to protect people's personal data in line with the GDPR (UK) regulations.

This means ensuring that any data collection is done in a transparent manner, ensuring fairness towards the individuals whose personal data is being processed.

Only the necessary personal data is collected for specific purposes that are communicated clearly to all users, and never used for other purposes. Personal data is stored no longer than necessary, and accessible in a controlled way.

Collection of Data

Personal data is collected only when it is needed. The data collected is relevant, and limited to what is necessary for the purpose.

We collect data for the purpose of:

- Tracking class attendance
- Contacting students, instructors and volunteers in case of a problem
- Processing DBS checks
- Processing Instructor payments
- Handling complaints, safeguarding or health and safety incidents
- Monitoring and Evaluation
 - Most M&E data will be anonymised. In case studies where the data is not anonymised, permission to share this data will be gained from the individual.

All data is stored in a secure google drive. Only the directors of the company have access to the google drive.

All directors are reminded to keep their passwords secure and to never share them.

Data Access and Storage

Data is stored for the shortest time possible. People who use Move Free CICs services or have registered to become an instructor or volunteer can ask to be removed from the database at any time, and their information is erased after two years of them not coming. The database is checked and updated annually. As much as reasonably possible, the data is accurate and up-to-date, depending on the information transmitted by the users.

People who have access to the data are the Directors of Move Free CIC, as well as instructors and volunteers only when strictly necessary.

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Anyone can request to see the information that Move Free CIC holds for them, request for it to be updated or deleted.

It is noted that if a volunteer or instructor requests certain information to be deleted, such as those required for safeguarding, they will no longer be eligible to run or assist in classes for Move Free CIC.

When anyone who has access to the personal data (Director, Instructor or Volunteer) processed by Move Free CIC terminates their relationship with Move Free CIC they will be asked to return or destroy any copies of personal data that they hold. Move Free CIC will change any passwords shared with this person.

Informed People

The purpose for processing of personal data must be known and the individuals whose data we are processing must be informed.

At the time people express an interest, they are clearly informed about:

- what Move Free CIC is;
- why Move Free CIC will be using their personal data (purposes);
- the categories of personal data concerned;
- the legal justification for processing their data;
- for how long the data will be kept;
- who else might receive it;
- that their data will not be shared
- that they have a right to a copy of the data (right to access personal data) and other basic rights in the field of data protection (see complete list of rights);
- their right to lodge a complaint with a Data Protection Authority (DPA);
- their right to withdraw consent at any time;

The information will be provided in writing in all languages, and orally if language allows it, in a concise, transparent, intelligible and easily accessible way, in clear and plain language.

Breach of Personal Data

In the event of a severe breach of personal data (i.e. one which meets the Information Commissioner's Office reporting threshold) Move Free CIC has a legal obligation to notify those put at risk and to report the data breach, along with all actions taken to mitigate and minimise the risk, to the Information Commissioner's Office within 72 hours of discovering the data breach.

In the event of a breach of personal data Move Free CIC will:

- Act swiftly to mitigate and minimise the impact and potential risks.
- Carry out a risk assessment which considers:
 - The information that has been breached
 - The number of people affected

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- Who may now have access to the data
- The severity of potential harm; nature of harm and likelihood
- Record all details of the data breach along with the subsequent actions taken by Move Free CIC in an incident log and submit it to the ICO if required. (To assess if the breach needs to be reported to the ICO, use the ICO's self assessment tool: <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/>)
 - If the risk is deemed severe and meets the reporting threshold report it to the ICO on the following number: 0303 123 1113
 - Notify persons at risk and provide information about how they can best protect themselves based on advice from the ICO

Such incidents will be handled by the directors at Move Free CIC. It will be raised in directors meetings as a point of learning to reduce the risk of a similar incident.

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