



Horsforth Climate Action

Privacy Policy

Date agreed: 26/03/24

Review Date: March 2026

Introduction

HCA is committed to protecting the rights and freedoms of individuals and safely and securely processing their data in accordance with all our legal obligations.

We hold personal data, in the form of contact details, about our Steering Group and members (volunteers).

This document contains:

1. Definitions.
2. Responsibility
3. Overall Statement of Policy
4. Data protection fee
5. Reviewing this policy

Appendix 1 - Data Protection Procedures.

1. Definitions

1. **Personal Data** - Information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings and written information.
2. **Data Protection** - Data Protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using amending, sharing, destroying or deleting personal data.

2. Responsibility

1. Overall and final responsibility lies with the Steering Group, who are responsible for observing activities and ensuring this policy is upheld.
2. All volunteers are responsible for observing this policy, and related procedures in all areas of their work for this group.

3. Overall Policy Statement

1. Horsforth Climate Action needs to keep personal data about its committee, members, volunteers and supporters in order to carry out group activities.
2. We will collect, store, use, amend, share or destroy personal data only in ways which protect people's privacy and comply with the UK General Data Protection Regulation (GDPR) and other relevant legislation.

3. We will only collect, store and use the minimum amount of data that we need for clear purposes and will not collect, store or use data we do not need.
4. We will only collect, store and use data for:
 - Purposes for which the individual has given explicit consent
 - Purposes that are in Horsforth Climate Action's legitimate interests
 - Contracts with the individual whose data it is
 - To comply with legal obligations
 - To protect someone's life
 - To perform public tasks.
5. We will provide individuals with details of the data we have about them when requested by the relevant individual.
6. We will delete data when requested by the relevant individual unless we are required to keep it for legal reasons
7. We will endeavour to keep personal data up to date and accurate
8. We will store personal data securely and separately from other data, records and open administrative documents.
9. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes
10. We will not share personal data with third parties, without the explicit consent of the individual unless legally required to do so
11. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
12. To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

4. Data Protection Fee

We are satisfied that we are under no requirement to pay a data protection fee to the ICO (Information Commissioner's Office) as we are a community group operating for not-for-profit purposes.

5. Reviewing this Policy

This Policy will be reviewed every two years

Data Protection Procedures

1. Introduction

1. Horsforth Climate Action has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways which are not covered here. In these cases we will ensure our Data Protection Policy is upheld.

2. General Procedures

1. Data will be stored securely. When it is stored electronically it will be kept in password protected files. When it is stored online in a third party website (e.g, Google Drive / Brevo,) we will ensure the third party complies with GDPR. We will endeavour not to store details on paper, but if necessary it will be filed carefully in a locked filing cabinet.
2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
3. We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

3. Mailing List

1. We will maintain a mailing list. This will include the names and contact details of people who wish to receive newsletters and information about volunteering opportunities from Horsforth Climate Action
2. When people sign up to the list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will provide information about how to be removed from the list with every mailing.
3. We will limit the people who have access to the list to the Hub Worker, the Chair and relevant people within the Comms and Newsletter Team.
4. We will use mailing list providers who store data within the EU.

4. Referring individuals to other community organisations or individuals

1. From time to time, individuals may contact the group who may want to signposts to other community organisations or community leaders, relating to the climate, the environment, community engagement and/or social justice.
2. We will request explicit consent before sharing any details with a third party.
3. We will not keep any individual's personal details for any longer than is necessary to signpost them on, unless they are a member of HCA, in which case we would retain contact details until asked not to.

5. Contacting volunteers.

1. Local people become members and interact with Horsforth Climate Action in a number of ways, From just receiving the Newsletter to active participation and volunteering.

2. We will maintain a list of contact details of our wider membership and active volunteers. We will share requests for help mainly via the Newsletter and sometimes by contacting people.
3. We will maintain a database of which there will be separate lists for new recipient and active volunteers, and the opt out from one or both of those.
4. People from the group will be removed from the list at their request.
5. We will provide a privacy notice via the Newsletter which explains why we have their information, what we are using it for, how long we will keep it and that they can have it deleted or amended at any time.
6. To allow members to work together or organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

6. Contacting Steering Group Members

1. The Steering group needs to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
2. Steering group contact details will be shared among the Steering group.
3. Steering Group members will not share each other's contact details with anyone outside of the Steering Group, or use them for anything other than Horsforth Climate Action Group activities, without explicit consent.

7. Photography and videos

1. We will make people aware that we will be taking photos or videos at public events and what for and advise them of who to inform if they do not want their photo taken. This will include advice on where and with whom we might share the photos. We will do this by putting large notices up at the events.
2. We will not take photos of children anywhere at any time without their parents or carers explicit consent.
3. We will not take photos or videos of children without their parent's or guardian's present.
4. We will not share photos or videos with a third party or partner organisation or on social media without their parents explicit consent.
5. If we are facilitating regular closed activities we will use photo consent forms to gain permission.
6. If we are sharing photographs or videos with third parties we will advise them how they can use them.
7. We will delete photos from our devices once we no longer need them.

8. Use of email

If someone indicates that they are interested in a particular area of HCA's activity, they may be added to one or other of the group's email distribution list(s).

Removal from these lists can be requested at any time by emailing your request to info@horsforthclimateaction.org

Any emails sent directly, rather than via the newsletter distribution list, should use the bcc field (blind copying) if including more than one person, unless there is explicit consent to share emails within the group.

This protocol applies to everyone within HCA, staff, steering group & volunteers.