

Kingsmeadow @ MadeForever: Data Protection Policy

1. PURPOSE

The purpose of this policy is to set out our commitment to processing data in accordance with our responsibilities under the GDPR. We will ensure that data is:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate data is erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods for statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. RESPONSIBILITY

This policy applies to all personal data processed by Kingsmeadow @ MadeForever (K@M4E). The Responsible Person is the Hub Manager who is responsible for ongoing compliance with this policy and reports any concerns to the Chief Officer. All staff who handle personal data understand the importance of data protection, are aware that K@M4E takes it very seriously and know their compliance responsibilities. We are registered with the Information Commissioner's Office as an organisation that processes personal data. Our ICO Registration Number is ZA782279.

3. DATA PROTECTION PRINCIPLES

- **Lawful, fair and transparent processing:** we will maintain a Register of Systems to ensure our processing of data is lawful, fair and transparent. The Register of Systems will be reviewed at least annually. Individuals have the right to access their personal data and any such requests made to K@M4E will be dealt with in a timely manner.
- **Lawful purposes:** all data processed by K@M4E must be done for a lawful reason - consent, contract, legal obligation, vital interests, public task or legitimate interests). We will note the reason in the Register of Systems. If we are keeping data on the basis of consent, evidence of opt-in consent will be kept with the personal data. Where communications are sent to individuals based on their consent, the option for them to revoke their consent will be clearly available and we will ensure that our data is updated if consent is withdrawn.
- **Archiving/removal:** to ensure that personal data is kept for no longer than necessary, K@M4E will review archiving needs for each system where data is processed, and review needs annually. (For example, maintaining data for reporting to funders). We will shall consider what data should or must be retained, for how long, and why.
- **Data minimisation:** K@M4E will ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** We will take reasonable steps to ensure personal data is accurate.
- **Security:** we will ensure that personal data is stored securely. Access to personal data will be limited to people who need access and appropriate security will be in place to avoid unauthorised sharing of information. When personal data is deleted this will be done safely such that the data is irrecoverable. We will have appropriate back-up and disaster recovery solutions be in place.
- **CCTV:** We will ensure that all footage is store securely. Only accessed by designate staff and used for the purpose of protecting K@M4E buildings and Hub assets, health & safety of staff, volunteers and Hub users, and reducing the incidence of crime and anti-social behaviour. Anyone can request a copy of the full CCTV policy.
- **Breach:** in the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, K@M4E will promptly assess the risk to people's rights and freedoms and, if appropriate, report this breach to the Information Commissioner's Office (ICO).

This Policy was adopted on: 2nd May 2024.....

K@M4E is committed to reviewing our policy and good practice annually.

Date for next review: 2nd May 2026

Signature ... 

Name	Lucie Martin-Jones	Position	Chair of Trustees
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