



Old Farnley & District Community Association

Trading as Farnley Community Centre

Charity Number: 1206552

GDPR & DATA PROTECTION POLICY

Effective from: 01/09/2026

Review by: 01/09/2027

GDPR & Data Protection Policy

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For: Old Farnley & District Community Association trading as Farnley Community Centre

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1. Introduction & Purpose

Old Farnley & District Community Association, trading as Farnley Community Centre, is committed to protecting the rights and privacy of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy sets out how we handle personal data fairly, lawfully, and transparently.

2. Scope

This policy applies to all trustees, staff, contractors, and volunteers ('representatives') and covers all personal data relating to service users, members, employees, volunteers, partners, and other stakeholders.

3. Data Protection Principles

We comply with the 7 principles of UK GDPR:

- Lawfulness, fairness and transparency – process personal data lawfully and fairly.
- Purpose limitation – collect data only for specified, explicit and legitimate purposes.
- Data minimisation – ensure data collected is adequate, relevant and limited to what is necessary.
- Accuracy – keep personal data accurate and up to date.
- Storage limitation – keep personal data only for as long as necessary.
- Integrity and confidentiality (security) – keep personal data secure.
- Accountability – take responsibility for demonstrating compliance with UK GDPR.

4. Lawful Bases for Processing

We process personal data under the following lawful bases:

- Consent – the individual has given clear consent.
- Contract – processing is necessary for a contract (e.g. employment, volunteer agreements).
- Legal obligation – processing is required by law.
- Vital interests – processing is necessary to protect life.
- Public task – processing is necessary for tasks in the public interest.
- Legitimate interests – processing is necessary for our legitimate interests and does not override rights.

5. Rights of Data Subjects

- The right to be informed about how their data is used.
- The right of access to their personal data.
- The right to rectification of inaccurate data.

- The right to erasure ('to be forgotten') where applicable.
- The right to restrict processing.
- The right to data portability.
- The right to object to certain processing.
- Rights relating to automated decision-making and profiling.

6. Responsibilities

Trustees will:

- Oversee compliance with data protection legislation.
- Approve and annually review this policy.

Data Protection Lead: Peter Allison (Chair & Trustee)

- Act as the main point of contact for data protection queries.
- Maintain records of data processing activities.
- Report data breaches to the ICO when necessary.

All representatives will:

- Follow this policy and complete data protection training.
- Only access and use personal data necessary for their role.
- Report concerns or breaches immediately to the Data Protection Lead.

7. Data Security & Storage

- Use strong passwords and secure systems for electronic data.
- Keep paper records locked and only accessible to authorised individuals.
- Encrypt and password-protect devices where personal data is stored.
- Never share personal data via unsecured channels.

8. Data Sharing & Third Parties

- We only share data with third parties where lawful and necessary.
- Contracts with third parties must include appropriate data protection clauses.
- We will not sell personal data to third parties.

9. Data Retention & Disposal

Personal data will be kept only as long as necessary for the purpose collected, in line with our Data Retention Schedule. When no longer required, data will be securely destroyed or anonymised.

10. Data Breaches

Any suspected or actual personal data breach must be reported immediately to the Data Protection Lead. Breaches will be logged and, where necessary, reported to the Information Commissioner's Office (ICO) within 72 hours.

11. Policy Governance

- Approved by the Board of Trustees of Old Farnley & District Community Association on 01/09/2026.
- Next review due annually or following legislative changes.
- Policy owner: Data Protection Lead (Peter Allison).