

GREAT MASSINGHAM AREA COMMUNITY CAR SCHEME

General Data Protection Regulations

Compliance Policy

1 Introduction

General Data Protection Regulations became effective in May 2018 and has, as its objective, returning control of personal data to its owner and simplifying the regulatory environment for use of such data.

2 Implication to the Scheme

The Scheme holds low-level personal data on its drivers and passengers to enable it to carry out its purpose of providing transport for people in rural communities who do not have access to transport.

The Information Commissioner's Office website states (inter alia)

- a) There is no "one size fits all" solution to information security.
- b) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Therefore, the Scheme is obligated to review and put into place its procedures in respect of security of and access to personal data within its limited resources to comply with the spirit of the Regulations.

3 Personal Data held by the Scheme

The data held by the Scheme is set out below.

For drivers: Name, address, telephone number(s), email address, vehicle registration number, insurance policy number and date of expiry, and driving licence number.

For passengers: Name, address, telephone number, brief medical notes (eg needs walking frame, accompanied by carer etc), and next of kin with contact details.

The above is held on a card index and some is duplicated electronically as a core part of the scheme's administration system.

4 Security Measures

The office is not totally secure and cannot be significantly reinforced as it is not owned by the Scheme.

Backup details of names and addresses are held in a secure, locked box in the event of a power cut.

The scheme uses a password secured computer system and (independently) a password secured computerised administration system. This holds all personal contact detail for Jobs, Passengers and Drivers, is backed up every day, both to a stand-alone storage device and offsite (with Dropbox). Our website and email has end to end encryption (https) so everything sent or received is completely garbled if intercepted.

5 Permission and Accessibility

The driver application form includes consent by the new prospective volunteer to the Scheme holding the information at (3) above.

Existing drivers will receive an email telling them what information we hold about them. They may reject this and are prompted at the foot of the email: "You are receiving this email because you opted in to receiving emails from the Great Massingham Community Car Scheme. If you would rather not receive this type of communication, please tell the administration office"

Each driver will carry a 'crib sheet' containing the contact details of the office and committee members along with guidance in the event of no-shows, emergencies, etc.

We will write to each first-time passenger explaining why we ask for and keep their personal data and informing them that they can access it at any time with reasonable notice.

All existing passengers will be advised similarly by the office coordinators over the telephone.

6 Retention of Data

Annually, we will conduct an audit of the drivers and passengers' databases to remove any data no longer required (due to resignation, death, moved home etc).

7 Administration of Data Protection Policy

Responsibility for administration of this policy rests with the Scheme Chair. Day to day management may be delegated to a nominated committee member or co-opted volunteer.

All coordinators and committee members are required to read and sign as having done so this policy on appointment and annually by end January.

8 Conclusion

The Scheme has acknowledged its obligations under legislation and will use its best efforts to take cost-effective measures to protect personal data.