



# ARC Renewal Community

## Information Retention Policy

**ARC renewal community has a responsibility to handle any data or information it stores concerning any member of the community, responsibly and confidentially. This document sets out how we, as a community enact this responsibility.**

The ARC Renewal Community holds the following data on **all** members of the community, which under GDPR (General Data Protection Regulations (2016) EU) is deemed the personal property of the individual:

- Name.
- Email address.
- Postal address including postcode.
- Landline and mobile telephone numbers.

This data is retained in order that the community can:

- Manage our volunteers.
- Maintain our own accounts and records.
- Deliver the services that individuals have requested.
- Inform individuals of news, events or activities running within ARC Renewal Community. For example to send out booking forms for our annual event.
- To communicate with each other throughout the year, so that we can pray for each other and communicate that need to one another.

This information is currently held in three places:

1. In a Google contacts folder on the ARC google drive, entitled [arc renewalcommunity@gmail.com](mailto:arc renewalcommunity@gmail.com)
2. On a Google sheets spreadsheet which is used both as a registration document for our annual event and to produce and manage our accounts.
3. In a contacts folder in Chris Rolfe-Moore's Hotmail account.
4. A paper record is kept in a filing cabinet at the home of Chris Rolfe-Moore.



Full details of the location of information held by the ARC Renewal Community, is contained within our information register which can be found on the same password protected Google drive entitled [arcrenewalcommunity@gmail.com](mailto:arcrenewalcommunity@gmail.com). A copy of our information register is available on request to:

Caroline Shevelan  
Cordillo Ltd  
DX22512  
Leigh  
[arcrenewalcommunity@gmail.com](mailto:arcrenewalcommunity@gmail.com)

## Data Control

The data referred to in this document is controlled by the ARC Renewal Community.

Currently there are three Data within the ARC renewal community who have access to this data: Chris Rolfe-More, Caroline Shevelan and Martin Fenlon.

**Members of the ARC Renewal Community have a right to request a copy of their data at anytime from the data controllers.**

This should be done in writing to [arcrenewalcommunity@gmail.com](mailto:arcrenewalcommunity@gmail.com) or

Caroline Shevelan  
Cordillo Ltd  
DX22512  
Leigh

A full copy of this document the information retention policy will be available from the 25th May for everyone to view, both on our website at [www.arcrenewalcommunity.org](http://www.arcrenewalcommunity.org), as a file on the facebook page, and on the 'policy wall' at our annual conference.

The following data control policies will be in place by the 30th September 2018.

1. All the information retained by the ARC Renewal Community will be current, and held with the permission of each individual member of the community.
2. All third parties that the ARC Renewal community interacts with will have been checked to ensure they are GDPR compliant. (See section Third Party Compliance)



3. The information will be held on an encrypted server at Cordillo Ltd. Or we will obtain consent from the community to keep this information on a google drive which may not be GDPR compliant.
4. Laptops used to download documents containing personal information (as defined by GDPR legislation) between Sharefile and software packages will be encrypted securely destroyed/erased when no longer in use. (Achieved 25th May 2018).

## 1. Obtaining consent to hold data

We will achieve this by asking everyone aged thirteen and over, who attends our annual event in August 2018, to read and sign a copy of our information notice. We will also ask parents of children below the age of thirteen to sign on behalf of their children.

From 30th September 2018 a new register has been kept and all out of date information deleted/destroyed along with the data of individuals who have not given their consent.

The data described on the first page of this policy will be retained for a period of 10 years from 30th of September 2018 and will be updated annually at our community event to ensure it is accurate. If, after the ten years retention period no new contact has been established either by phone, in writing via email or post, via the facebook page or via another member of the community, the team will assume that the individual no longer wishes to be contacted by the ARC Renewal Community and will delete their contact details from the database.

We will keep an electronic consent register, currently on a google drive, and retain a paper copy of signed consent forms in a locked filing cabinet at the home of Caroline Shevelan.

## 2. Third Party Information

Under GDPR, the ARC Renewal Community is responsible for ensuring that any third parties it deals with are compliant with the new legislation.

This will be achieved by contacting the third parties concerned and asking for evidence of the following:

- A copy of Policies and Agreements that the company has in place with regard to data protection and GDPR legislation.



The ARC Renewal Community deals with the following third parties. The names in **bold** are the third parties where there may be an opportunity for personal information to be shared with third parties.

- **Google**
- **UK fast**
- **Sharefile**
- **Cordillo Ltd**
- **34SP**
- **Wordpress**
- **Facebook (Google)**
- **SAFE CiC**
- Bewerley Park Outdoor Education Centre [01423 711287](tel:01423711287)
- Pateley Bridge Pool [01423 711442](tel:01423711442)
- The Nippy Chippy 07790065615
- The logs man
- The milkman 07967 967907
- The icecream man 07763 191 458
- African Drumming lady

Once this information has been obtained it will be held on an electronic register with copies of the policies and evidences obtained. This register will be available from 30th September 2018 for anyone to view on request to:

Caroline Shevelan  
Cordillo Ltd  
DX22512  
Leigh

It is likely that Google will be removed from the list at that time and the information be held with UK Fast and Cordillo Ltd or that people will consent to us using a google drive.

### [3. The moving of personal information to an encrypted server](#)

It is the intention of the ARC Renewal Community to move all of its personal data to an encrypted server which is hosted within the UK and is therefore fully GDPR compliant. Currently this is likely to be held at Cordillo Ltd a server hosted by UK Fast which is also



GDPR compliant. However this may change upon further research and discussion within the team. We may also, with the consent of the community, choose not to do this.

The ARC Renewal Community is delaying this transition until September in order to avoid technological issues in the run up to its annual event in August.

#### 4. Laptop encryption

Caroline Shevelan, Chris Rolfe-Moore and [Martin Fenlon](#), the three people within the community who have access to personal information as defined by GDPR, all have encrypted laptops. In addition Caroline Shevelan uses an app called mobile iron which creates a secure encrypted cloud within the computer so that the information never touches the hard drive.

This means that if laptops were to be stolen, lost or needed to go for repair, no-one would be able to retrieve the information from the hard drive.

Caroline Shevelan, Chris Rolfe-Moore and Martin Fenlon have also agreed to have all technology wiped to military standard once they have finished using the equipment before it is passed on to anyone else

Should the laptop be sent for destruction or recycling, all hard drives will be destroyed by a certified company and a certificate of destruction retained.

#### **Additional Information - Safeguarding**

In addition to the information stated above, the ARC Renewal Community also holds a record of the individuals within the community who hold a current DBS certificate to enable them to volunteer with the ARC Renewal Community. This record contains:

- Name
- Address
- Email address
- Telephone number

This data is retained so that the ARC Renewal Community can:

- Manage our volunteers. This includes the need to contact them to renew DBS certificates and with information about current courses.



- Ensure that our volunteering recruitment is compliant with child protection legislation.

The ARC Renewal Community also retains a copy of the DBS certificates of individuals who have a current DBS certificate to work within the ARC Renewal Community. This information is retained in order for the lead safeguarding officer to comply with the law on safeguarding children.

A current DBS certificate contains the following information:

- Name
- Date of birth
- Place of birth
- Address

Where this information is held digitally it is retained on a password protected, encrypted site called sharefile. This is held by a server hosting company which trades by the name UK Fast and is managed through the servers of Cordillo Ltd. a GDPR consultancy firm.

Currently only Caroline Shevelan and Chris Rolfe-Moore of the ARC renewal community have access to this data in addition to the individuals themselves. Caroline Shevelan is currently the lead safeguarding officer for the ARC Renewal Community.

Where this information is held physically, it is retained in a locked filing cabinet at the home of Caroline Shevelan.

The ARC Renewal Community has a separate policy for handling DBS data. This is available on our website, on the files section of our facebook page, on the 'policy wall' at our annual event and in writing from [arcrenewalcommunity@gmail.com](mailto:arcrenewalcommunity@gmail.com) or

Caroline Shevelan,  
Cordillo Ltd  
DX22512  
Leigh.

## **Data Sharing**

Your personal data will be treated as strictly confidential, and will ONLY be available to be viewed by the following named people; Chris Rolfe-Moore, Caroline Shevelan and Martin Fenlon.



Your personal data **WILL NOT** be shared within ARC Renewal Community without your consent unless required to do so by law. This consent was obtained on the booking form and a record is kept on the booking/registration document of who has consented to this and who has not. We will also keep a consent register. All members of the team are aware of who has NOT consented to share their details WITHIN the community.

We **WILL NOT** share your data outside of the ARC renewal community, unless required to do so by law, or with your explicit consent.

The ARC renewal community has taken all reasonable measures, as set out in this document, to ensure that the data that it holds is held securely and confidentially and cannot be obtained without permission of the individual to whom the data belongs.

### **Data Breach**

If a Breach of someone's personal data occurs it should be internally reported to our nominated Data Protection Officer Caroline Shevelan at [arcrenewalcommunity@gmail.com](mailto:arcrenewalcommunity@gmail.com) and then to the Information Commissioner's Office within 72 hours.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113

<https://ico.org.uk/global/contact-us/>

### **Facebook**

If any member of the ARC renewal community is a member of the facebook group associated with the community, data collection is subject to the preferences the individual has set on their facebook profile when they signed up.

Any data obtained by Facebook through our Facebook page is the responsibility of each individual member of the community. This data is not held, stored or processed by the community in anyway.

### **Website**

Version 1.0  
09/06/19



Our current web address is [www.arcreealcommunity.org](http://www.arcreealcommunity.org).

It is a site created in Word Press by Chris Lunt and is maintained by Chris Lunt and Caroline Shevelan.

The Site is hosted by 34SP which is a GDPR compliant hosting company.

Our privacy notice for the website is available on the website

#### Resources & Further Information

- [Overview of the GDPR – General Data Protection Regulation](#)
- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [34sp Privacy Policy](#)
- [Safe CiC Privacy Policy](#)
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