

22.9.2022

**Privacy Notice**  
**and**  
**Data Protection Policy**  
**for the**  
*Redgrave cum Botesdale*  
*with the Rickinghalls*  
*Parish Magazine*  
**and**  
*Local Services Directory*

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## Foreword

### Purpose of this Document

In response to the requirements of :

- UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018 (DPA) and
- the DPA itself

this document describes the way in which those who produce the *Redgrave cum Botesdale with the Rickinghalls Parish Magazine* and the *Local Services Directory* use and protect any *Personal Data* required to execute that task.

### What is Personal Data?

*Personal Data* is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email or physical address), either on its own or in combination with other available cross-referenceable data.

### The Parish Magazine and Local Services Directory

The *Redgrave cum Botesdale with the Rickinghalls Parish Magazine* (referred to below as the *Magazine*) is a local publication containing items of interest to residents of 4 parishes – *Botesdale, Redgrave, Rickinghall Superior* and *Rickinghall Inferior*. The Magazine is published 10 times per year, the August/September and December/January editions each covering 2 months.

The *Local Services Directory* (referred to below as *the LSD*) is published annually in March as a hardcopy reference for residents, containing email and telephone contact details for those who run local organisations. It also contains public contact details that may be of use to residents, such as Parish Councillors, Police, and the Botesdale Health Centre. The LSD is updated and the latest version made available online throughout the year at <http://www.stmarysrickinghallinferior.onesuffolk.net/local-information/>. Updates that are made to the online LSD are publicised in the Magazine, allowing residents to update their printed copies.

### Definitions used in this Document

The table on the next page lists the terms used in this document to describe :

- the information the Magazine and LSD contain
- those who provide the material for the Magazine and LSD
- the people involved in the production and distribution of the Magazine and LSD
- those permitted to request changes to Personal Data processed by the Magazine and LSD
- the geographic coverage of the Magazine and LSD
- those who receive the Magazine and LSD

<b>Term</b>	<b>Description</b>
<b>Area</b>	Where the Magazine is delivered – ie <ul style="list-style-type: none"> <li>• Botesdale</li> <li>• Redgrave</li> <li>• Rickinghall Superior</li> <li>• Rickinghall Inferior</li> </ul>
<b>Authorised person/people</b>	<i>Authorised people</i> are those who are clearly the owners of Personal Data, or those who are their obvious agents, and may request changes to such data. Investigations will be made to ensure validity of any uncertain credentials
<b>Content</b>	Material provided to the Volunteers for inclusion in the Magazine or LSD
<b>Contributors</b>	Providers of Content: residents in the Area, and advertisers in and beyond the Area
<b>Consumers</b>	Residents who live in the Area and receive the Magazine and LSD
<b>Stakeholders</b>	Consumers, Contributors and Volunteers are collectively known as <i>Stakeholders</i>
<b>Volunteers in the following roles :</b>	Residents who produce and distribute the Magazine and LSD as shown below
Advertisements Manager	<ul style="list-style-type: none"> <li>• Coordinate Magazine advert content, placement, payment</li> <li>• Arrange Magazine distribution</li> <li>• Oversee finances</li> </ul>
Articles Manager	<ul style="list-style-type: none"> <li>• Coordinate input from Contributors</li> </ul>
Distributors	<ul style="list-style-type: none"> <li>• Distribute Magazines to Deliverers</li> <li>• 1 distributor for each of Botesdale, Redgrave and Rickinghall</li> </ul>
Deliverers	<ul style="list-style-type: none"> <li>• Receive Magazines from Distributors, and deliver them to Consumers</li> <li>• Multiple deliverers in each Parish</li> </ul>
Editor	<ul style="list-style-type: none"> <li>• Edit the Magazine and send for printing</li> <li>• Oversee Content decisions</li> <li>• Contact details : editoratrbrparishmag@gmail.com</li> </ul>
Events Manager	<ul style="list-style-type: none"> <li>• Coordinate Magazine event content and placement</li> <li>• Produce the LSD</li> </ul>
Fillers Manager	<ul style="list-style-type: none"> <li>• Source miscellaneous content to fill empty spaces in the Magazine</li> </ul>
Technical Support Manager	<ul style="list-style-type: none"> <li>• Provide IT support</li> </ul>

## Privacy Notice

### Use of Personal Data

The Volunteers who produce the Magazine and LSD take the privacy of the Contributors, Consumers and the Volunteers themselves very seriously. In particular, the use of stakeholders' Personal Data is controlled as follows :

- used solely to produce and distribute the Magazine and LSD
- not shared beyond the Volunteers, unless authorised by an *Authorised Person*
- changes to existing published data are made on request by an *Authorised Person* as follows :
  - LSD :
    - a prominent statement is published annually in the February Magazine to flag requests for additions, deletions or changes to LSD content prior to its March reprint
    - authorised change requests for the *online* version of the LSD can be made at any time
  - Magazine :
    - authorised changes will be made on request, as soon as possible within the publication cycle

The nature of the data, how it is received, stored and used is described in the *Data Protection Policy* described below.

Anybody may contact the Magazine Editor with questions about this Privacy Notice or the Personal Data the Magazine or LSD holds about them.

### Publicising Use of Personal Data

A statement is made annually in the Magazine to alert all Consumers that :

- Personal Data provided to the Magazine and/or LSD Volunteers may be stored for the purposes of Magazine/LSD production
- anyone is free to request, via the Magazine Editor, details of any Personal Data held about them used for the production of the Magazine and LSD
- anyone is free to request, via the Magazine Editor, deletion of any Personal Data held about them used for the production of the Magazine and LSD

An abbreviated version of this statement appears in the signature block of Volunteer Managers' emails.

### Data Protection Officer

The Parish Magazine is not required to have a Data Protection Officer (see *Appendix 2 : 2022 UK GDPR Compliance Self-assessments*). Ultimate control is exercised by the Editor of the Magazine (*editoratrbparishmag@gmail.com*), who will control, or delegate control of access to *Centralised data*. *Dispersed data* is under the day to day control of the Volunteers. See *Where is Personal Data Stored?* below for a description of *Centralised* and *Dispersed* data.

Requests for changes to Personal Data are made to the Editor of the Magazine or his/her delegates by *Authorised People*, whose credentials will be considered prior to making any changes.

## Changes to this notice

This Privacy Notice will be reviewed bi-annually or earlier if circumstances require it. The latest version is stored online at <http://www.stmarysrickinghallinferior.onesuffolk.net/home/data-protection/>.

## Data Protection Policy

### What Personal Data is Stored?

Personal data handled by the Magazine and LSD may contain any of individuals' name(s), email address(es), phone number(s), and photograph(s), along with anything else that may identify an individual by virtue of their being referenced in Magazine or LSD contents. For example, an advertisement that provides contact details for an individual for advertised goods or services. A role-related list of the type of data stored by the Volunteers can be found in *Appendix 1 : Type of Personal Data held by the Volunteers*.

### What is the Origin of the Personal Data?

Personal Data can be made known to the Volunteers involved in Magazine and LSD production in multiple ways, for example :

- involvement in Magazine / LSD production requiring Volunteers know the contact details of each other
- provision of Content via :
  - casual conversation with potential Contributors
  - received phone calls/emails that expose caller's/sender's phone/email contact details
  - requests from individuals, for example, to be included in the LSD
- details included in the Content itself – eg contact details of a service provider

### How is Personal Data used?

Personal data is stored solely to facilitate production of the Magazine and LSD and is held by stakeholders as shown in the table on the next page.

From the table it can be seen that, of the three stakeholders, only Volunteers come into contact with Personal Data in relation to Magazine and LSD publication. The remainder of the document addresses the Volunteer's management of this data.

It should be noted that contributors often contact the wrong Magazine team member when trying to place content in the Magazine. Hence there may be contributors who inadvertently put their contact details in the hands of the wrong team member. In such cases the contributor is re-directed appropriately and the initial contact medium is deleted.

Stakeholder	What Personal Data is Stored by the Stakeholder, and Why?
<b>Contributors</b>	Personal data for publication by the Magazine/LSD is not used by Contributors - they are not involved in Magazine/LSD preparation beyond the content they provide. They are, however, responsible for the accuracy of the content and the permissions required for the publication of any personal data contained therein.
<b>Consumers</b>	Personal data published by the Magazine/LSD is not used by Consumers beyond their consumption of the information published in the Magazine and LSD. Consumers are not involved in Magazine/LSD preparation.
<b>Volunteers</b>	Personal data is stored to facilitate the publication of the Magazine and LSD. Its need and use varies according to the Volunteer's role as shown below. Volunteers share each other's contact details
Advertisements Manager	email/phone contact details of advertisers used in the preparation of advertisements
Articles Manager	email/phone contact details of Contributors who provide articles for the Magazine
Distributors	email/phone and home address details of Deliverers for distribution to those who deliver the magazines
Deliverers	Consumer delivery addresses (no name, email/phone details) to enable deliveries + Distributor's email/phone details
Editor	email/phone contact details of Contributors who contact the Editor
Events Manager	email/phone contact details of Contributors who request Events adverts
Fillers Manager	email/phone contact details of Contributors who supply content
Technical Support Manager	email/phone contact details of Volunteers

### Where is Personal Data Stored?

The ways in which Personal Data is stored by the Volunteers is according to their own preference, or as a result of past or evolving team practice (for example centralised cloud storage). Personal Data is physically stored as :

- **Dispersed data** : stored on the laptop or PC hard disks of Parish-owned or privately-owned computers used for the production of the Magazine and LSD
- **Hardcopy data** – paper printouts are a subset of *Dispersed data*, used by Volunteers to facilitate execution of their duties
- **Centralised data** : stored on a shared disk provided via Microsoft OneDrive
  - typically in the format of a Microsoft Word, Publisher or Excel file

## How is Personal Data Protected?

The Volunteers protect the stored Personal Data as follows :

- **Dispersed data (on laptop/PC disks) :**
  - the Volunteers apply integrity and common sense in protection of both the physical and virtual aspects of the Personal Data they handle during the production of the Magazine and LSD on the laptop or PC hard disks of Parish-owned or privately-owned computers
  - this includes care and security of the hardware, and application of up-to-date antivirus software
- **Hardcopy data (paper printouts)** are stored securely at the Volunteers' premises
- **Centralised data (on OneDrive) :**
  - access is :
    - restricted to those Volunteers who have a genuine need to use the data
    - granted by the Technical Support Manager
  - the Volunteers apply integrity and common sense in protection of the Personal Data they handle
  - Microsoft OneDrive software provides tools for access control

## What Personal Data is Published?

The Volunteers use their best ability and judgment when determining what is published in the Magazine or LSD.

Although exercising due diligence and care to filter out inappropriate content, the Volunteers are not responsible for the content provided by the Contributors – this is the responsibility of the content provider, ie the *Contributor*. The Volunteers accept all content in good faith, their role being limited to assembly of the provided information to produce the Magazine.

Once published, the content becomes public in printed form and online at

Magazine : <http://stmarysrickinghallinferior.onesuffolk.net/parish-magazine/>

LSD : <http://www.stmarysrickinghallinferior.onesuffolk.net/local-information/>

## What Personal Data Expiry Measures are in Place?

For the Magazine, no specific process exists to delete ageing data, as it may always prove of value in the production of the Magazine or LSD – eg to contact occasional Contributors for Content. Old versions of the Magazine and LSD are retained in an archive folder on OneDrive.

For the LSD, the current copy is replaced by a new copy when the Magazine is notified by an Authorised Person that a change, deletion or addition should be made. The new copy is then made available on the website. Ageing versions of the LSD are deleted, retaining newer versions for reference.



## Appendix 1 : Type of Personal Data held by the Volunteers

The table below summarises the type of data held by each Volunteer. The online folder location of all stored data is available in the document :

*Producing the Redgrave cum Botesdale with the Rickinghalls Parish Magazine and the Local Services Directory.*

The Technical Support Manager can provide a copy of this on request.

<b>Volunteer</b>	<b>Medium and Nature of Stored Personal Data</b>
Advertisements Manager	Advertisers' & Volunteers' Gmail/phone details + Centralised Data for : Advert masters; Invoices; Bank Statements; Magazine subscriber names and addresses
Articles Manager	Contributors' & Volunteers' Gmail addresses + Centralised Data for submitted articles
Distributor	Deliverers' & Volunteers' Gmail/phone details + Centralised Data for <i>Distribution Details</i> that contains names/addresses/delivery rounds of distributors and deliverers + Consumers' address lists used by each deliverer (delivery addresses only)
Deliverers	Hardcopy of delivery round addresses (no names included) supplied by their Distributor
Editor	Contributors' & Volunteers' Gmail addresses + Centralised Data for Volunteers
Events Manager	Contributors' & Volunteers' Gmail addresses + Centralised Data for Event ads and LSD
Fillers Manager	Contributors' & Volunteers' Gmail addresses + Centralised Data for filler material
Technical Support Mgr	Volunteer Gmail addresses + Centralised Data for system maintenance

## Appendix 2 : 2022 UK GDPR Compliance Self-assessments

### Overall Rating

Self-assessed on 20.9.22 at <https://ico.org.uk/for-organisations/sme-web-hub/checklists/assessment-for-small-business-owners-and-sole-traders/> :

### 2022 Small business owners and sole traders report

20 September 2022

### Overall rating

Your overall rating was green.

- 9: Yes
- 0: No
- 0: In part

GREEN: in place

Do you have a record of what personal data you hold? Do you know what you use it for?

Do people know you have their personal data and understand how you use it?

Do you only collect the personal data you need?

Do you only keep personal data for as long as it is needed?

Do you keep personal data accurate and up to date?

Do you keep personal data secure?

Do you have a way for people to exercise their rights regarding the personal data you hold about them?

Do you and your staff (if you have any) know your data protection responsibilities?

Do you know if you are obliged to pay a data protection fee?

Thank you for using the small business owners and sole traders checklist

## Need for a Data Protection Officer

Self-assessed on 20.9.22 at <https://ico.org.uk/for-organisations/does-my-organisation-need-a-data-protection-officer-dpo/> :

For [organisations](#) / Does my organisation need a data protection officer (DPO)?

### Do I need a Data Protection Officer (DPO)?

 Start again

1. Are you a public authority or body?

**No**

[Change this answer](#)

2. Do your organisation's core activities require regular and systematic monitoring of individuals on a large scale?

**No**

[Change this answer](#)

3. Do your organisation's core activities involve processing on a large scale 'special categories' of personal data, or 'criminal convictions or offences data'?

**No**

[Change this answer](#)

#### Your organisation does not need a data protection officer.

However, you can voluntarily appoint a DPO. It's important to note, if you do appoint one voluntarily you need to [register them with us](#).

Although you may not need to appoint a DPO, it's important to have someone in your organisation who is responsible for data protection.

Read our [guidance on data protection officers](#).

## Exemption from a Data Protection Fee

Self-assessed on 20.9.22 at <https://ico.org.uk/for-organisations/data-protection-fee/self-assessment/>

For [organisations](#) / [Data protection fee](#) / Self-assessment

### Registration self-assessment

 Start again

1. Do you use CCTV for the purposes of crime prevention?

**No**

[Change this answer](#)

2. Are you processing personal information?

**Yes**

[Change this answer](#)

3. Do you process the information electronically?

**Yes**

[Change this answer](#)

4. Is your organisation responsible for deciding how the information is processed?

**Yes**

[Change this answer](#)

5. Do you only process information for one of the following purposes?

**No**

[Change this answer](#)

6. Are you a not-for-profit organisation that qualifies for an exemption?

**Yes**

[Change this answer](#)

#### You are under no requirement to pay a fee

Some not-for-profit organisations are exempt and based on the information you have provided you do not have to pay a data protection fee to the ICO.

However, it is important that your organisation adheres to the principles of the General Data Protection Regulations and understands best practice for managing information. To help ensure you are complying with the GDPR, we have produced a range of [training materials](#) including practical toolkits, training videos and more.

Even if you are exempt, you may still wish to [pay a data protection fee](#).

## Appendix 3 : Comments and Further Information

### Further Details

For further details regarding production of the Magazine and LSD, contact the *Technical Support Manager* to see a copy of *Producing the Redgrave cum Botesdale with the Rickinghalls Parish Magazine and the Local Services Directory*.

### Comments and Complaints

Comments and/or complaints regarding this Privacy Notice and Data Protection Policy, and the Volunteers' adherence to them, should be directed in writing to the *Magazine Editor*. These will be processed in an honest and fair manner, such that, should they be considered valid, appropriate change will be made.

### Changes made to this document since first publication on 8.2.19

- 7.6.2020
  - updated publication and review dates on cover page
  - changed references to *Local Activities Directory* to its new name *Local Services Directory*
  - folder locations updated following recent review of folders configuration
- 20.10.22
  - reviewed in the light of post-Brexit regulation and *UK GDPR*
  - updated publication and review dates on cover page
  - corrected references to now-discontinued email domain *@rbrparishmag.com*
  - reference to review frequency changed to bi-annual
  - updated references to volunteers to reflect updated roles and responsibilities
  - *Location and Type of Storage* column in *Appendix 1 : Type of Personal Data held by the Volunteers* table replaced with a reference to document *Producing the Redgrave cum Botesdale with the Rickinghalls Parish Magazine and the Local Services Directory* to enhance currency of data should any enquiry be made
  - documented results of *Information Commissioner's Office (ICO)* self-assessments re *Small business owners and sole traders, need for a Data Protection Officer, Fee exemption*
  - removed references to *Data Controller* having confirmed no *Data Protection Officer* is required