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

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Foreword

Purpose of this Document

In response to the requirements of :

- the General Data Protection Regulation (EU) 2016/679 (GDPR) as it applies in the UK, 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 Activities 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 Activities 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 Activities Directory* (referred to below as *the LAD*) 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 LAD 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 LAD 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 LAD contain
- those who provide the material for the Magazine and LAD
- the people involved in the production and distribution of the Magazine and LAD
- those permitted to request changes to Personal Data processed by the Magazine and LAD
- the geographic coverage of the Magazine and LAD
- those who receive the Magazine and LAD

Term	Description
Area	Where the Magazine is delivered – ie <ul style="list-style-type: none"> • Botesdale • Redgrave • Rickinghall Superior • Rickinghall Inferior
Authorised person/people	<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
Content	Material provided to the Volunteers for inclusion in the Magazine or LAD
Contributors	Providers of Content: residents in the Area, and advertisers in and beyond the Area
Consumers	Residents who live in the Area and receive the Magazine and LAD
Stakeholders	Consumers, Contributors and Volunteers are collectively known as <i>Stakeholders</i>
Volunteers in the following roles :	Residents who produce and distribute the Magazine and LAD as shown below
Advertisements & Administration Manager	<ul style="list-style-type: none"> • Coordinate Magazine advert content, placement, payment • Arrange Magazine email distribution • Oversee finances
Calendar Manager	<ul style="list-style-type: none"> • Merge all parish activities into a single Magazine calendar • Interface with contributors to validate events, times, locations
Distributors	<ul style="list-style-type: none"> • Distribute Magazines to Deliverers • 1 distributor for each of Botesdale, Redgrave and Rickinghall
Deliverers	<ul style="list-style-type: none"> • Receive Magazines from Distributors, and deliver them to Consumers • Multiple deliverers in each Parish
Editor	<ul style="list-style-type: none"> • Edit the Magazine and send for printing • Oversee Content decisions
Events Manager	<ul style="list-style-type: none"> • Coordinate Magazine event content, placement • Produce the LAD • Provide IT support
Others	<ul style="list-style-type: none"> • Provide church service details; coordinate reports on Parish Councils, clubs, wildlife; puzzles; general items of interest to the community

Privacy Notice

Use of Personal Data

The Volunteers who produce the Magazine and LAD 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 LAD
- 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 :
 - LAD :
 - a prominent statement is published annually in the February Magazine to flag requests for additions, deletions or changes to LAD content prior to its March reprint
 - authorised change requests for the *online* version of the LAD 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 Data Controller with questions about this Privacy Notice or the Personal Data the Magazine or LAD 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 LAD Volunteers may be stored for the purposes of Magazine/LAD production
- anyone is free to request, via the Data Controller for the Magazine and LAD, details of any Personal Data held about them
- anyone is free to demand, from the Data Controller for the Magazine and LAD, deletion of any Personal Data held about them

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

Data Controller

Ultimate control is exercised by the Editor of the Magazine (editor@rbrparishmag.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 Data Controller 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 annually or earlier if circumstances require it. The latest version is stored at <http://www.stmarysrickinghallinferior.onesuffolk.net/parish-magazine/>.

Data Protection Policy

What Personal Data is Stored?

Personal data handled by the Magazine and LAD 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 contents. For example, an advertisement that provides contact details for an individual for advertised goods or services. A full list of the data stored by the Volunteers can be found in Appendix 1.

What is the Origin of the Personal Data?

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

- involvement in Magazine / LAD 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 LAD
- details included in the Content itself – eg contact details of a service provider

Why is Personal Data Stored?

Personal data is stored solely to facilitate production of the Magazine and LAD and is held by stakeholders as shown in the following table.

Stakeholder	Why Personal Data is Stored
Contributors	Personal data for publication by the Magazine/LAD is not used by Contributors - they are not involved in Magazine/LAD 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.
Consumers	Personal data published by the Magazine/LAD is not used by Consumers beyond their consumption of the information published in the Magazine and LAD. Consumers are not involved in Magazine/LAD preparation.
Volunteers	Personal data is stored to facilitate the publication of the Magazine and LAD. Its need and use varies according to the Volunteer's role as shown below
Advertisements/Admin Manager	email/phone contact details of Contributors (advertisers) + Volunteers
Calendar Manager	email/phone contact details of leaders of local organisations + Volunteers
Distributors	email/phone and home address details of Distributors and Deliverers
Deliverers	Delivery addresses only – no associated names or contact details
Editor	email/phone contact details of Contributors who contact the Editor + Volunteers
Events Manager	email/phone contact details of Contributors who request Events adverts + Volunteers
Others	email/phone contact details of those who request items be published + Volunteers

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 LAD publication. The remainder of the document addresses the Volunteer's management of this data.

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 iCloud 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 LAD
 - **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 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 LAD 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 Data Controller (or delegate)
 - the Volunteers apply integrity and common sense in protection of the Personal Data they handle
 - Microsoft OneDrive software provides the 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 LAD. The Content sent to the Volunteers for publication is typically repetitive and predictable, although exceptions occur that Volunteers will consider, to determine suitability for publication.

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, the Magazine and LAD, becomes public, both as hardcopy and online at <http://stmarysrickinghallinferior.onesuffolk.net/parish-magazine/>

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 LAD – eg to contact occasional Contributors for Content. Old versions of the Magazine and LAD are retained in an archive folder on OneDrive.

For the LAD, 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 LAD are deleted, retaining newer versions for reference.

Appendix 1 : Personal Data held by the Volunteers

Role	Nature of Stored Personal Data	Location and Type of Storage
Advertisements & Admin Manager	Advertisement masters - may contain Personal Data	Various file formats and names in folder <i>parish magazine/Adverts/Commercial Ads masters</i>
	Advertisers' names and contact details	<i>YYYY Adverts Database.xls</i> in folder <i>parish magazine/Adverts/Adverts Database</i>
	Invoices - may contain Personal Data	<i>Advertiser ID/date Invoice.doc</i> in folder <i>parish magazine/Magazine Admin/Finances</i>
	Bank Statements - may contain Personal Data Home names and addresses for posted copies of the Magazine	<i>DDMMM YYYY Bank Statement.pdf</i> in folder <i>parish magazine/Magazine Admin/Finances</i> <i>Postal subscription to Parish Magazine.docx</i> in folder <i>parish magazine/Magazine Admin</i>
Calendar Manager	Programmes supplied by local organisations that may contain the organisers' Personal Data Publicised list of organisations in the Area with contacts' details Contact details for leaders of organisations frequently or intermittently referenced by the Magazine	Various formats and names in folder <i>parish magazine/Calendar/ Events, Directories & Programmes /Programmes</i> <i>Local Activities Directory Rev x.docx/pdf</i> – in folder <i>parish magazine/Calendar/ Events, Directories & Programmes /Local Activities Directory</i> <i>Events Contacts & Schedules.xls</i> in folder <i>parish magazine/Calendar/Events, Directories & Programmes</i>
Distributor	Names/addresses/delivery rounds of each deliverer Address lists used by each deliverer – containing addresses only	<i>Botesdale deliverers.docx, Redgrave deliverers.docx</i> <i>Rickinghall deliverers.docx</i> all in folder <i>parish magazine/Magazine Admin/Distribution/Distributors</i> <i>"Delivery round number" address list.docx, eg 7 address list.docx</i> in folder <i>parish magazine/Magazine Admin/Distribution/Deliverers</i>
Deliverers	Delivery addresses only	On paper
Editor	-	-
Events Manager	-	-
Others	-	-

Appendix 2 : GDPR Compliance Statement

This is the result of completing the compliance assessment at *ICO Assessment for small business owners and sole traders* at <https://ico.org.uk/for-organisations/resources-and-support/data-protection-self-assessment/>. Of those available, this category most closely reflects the Parish Magazine/LAD organisation.

29 January 2019

Overall rating

Your overall rating was green.

- 7: Yes
- 0: No
- 1: In part

AMBER: partially in place

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

Suggested actions:

You should:

- decide and record how long you should be holding the personal data you collect. This will vary depending on the personal data and why you have it
- destroy information you have been holding for longer than the times you have identified, and
- regularly check you are not keeping personal data longer than you need to.

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 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?

Thank you for using the small business owners and sole traders checklist. [Let us know what you think by completing our short survey.](#)



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Appendix 3 : Comments and Further Information

Further Details

For further details regarding production of the Magazine and LAD, contact the Data Controller to see a copy of *Producing the Redgrave cum Botesdale with the Rickinghalls Parish Magazine and the Local Activities 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 Data Controller. These will be processed in an honest and fair manner, such that, should they be considered valid, appropriate change will be made.

Should you not be satisfied with the outcome, you can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.