

Data Protection Policy

Merry Go Round Toy Libraries

Last updated	May 2018
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Definitions

Charity	means Merry Go Round Toy Libraries, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Fiona Daughton (Toy Library Co-ordinator)

1. Data protection principles

Merry Go Round Toy Libraries recognises that the previous Data Protection principles remain largely unchanged and are of utmost importance. GDPR requires the Toy Libraries to ensure our data processing is:

- a. Lawful, fair and transparent
- b. That personal data is collected for specified, explicit and legitimate purposes and not further processed in an incompatible way
- c. That personal data is adequate, relevant and limited to what is necessary to achieve the purposes for which it was collected
- d. That personal data is accurate and kept up to date, and that we take reasonable steps to rectify or erase inaccurate data
- e. That personal data is not kept in identifiable form for longer than necessary
- f. That personal data is processed in a way that ensures security of the data and protects it from unauthorised use
- g. That we can demonstrate compliance with the Principles

2. General provisions

- a. This policy applies to all personal data processed by the Charity
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy
- c. This policy shall be reviewed at least annually

3. Registration with the Information Commissioner's Office

Merry Go Round, like most charities and not-for-profit organisations, qualifies for exemption from registering with the Information Commissioners because it was established for not-for-profit making purposes and does not make a profit. We must:

- a. Only process information necessary to establish or maintain membership or support
- b. Only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it
- c. Only share the information with people and organisations necessary to carry out the organisation's activities. Important - if individuals give us permission to share their information, this is alright
- d. Only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration

3. Lawful, fair and transparent processing

- a. This Policy shall be reviewed at least annually.
- b. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. Each new member is asked to fill in a form with contact details, number of children and whether joining as a group member or a family member. Contact information is entered into a card index system and used in case of overdue toys or for renewing membership. All details given are confidential, kept securely and not passed on to third parties. They are only used in connection with the toy library
- b. Email addresses are added to a mailing list for information about our services, closure dates, fundraisers etc.
- c. Paper and card copies of information are destroyed within two years of membership lapsing.
- d. Every email sent includes information on how to unsubscribe or Merry Go Round members can send a blank email from the email address we hold to mgr-members-unsubscribe@mgrtoylibrary.org. Spinning Top members can email stop-members-unsubscribe@mgrtoylibrary.org.
- e. Consent is relied upon for the lawful basis for processing data. Members are asked to sign the membership form giving consent for us to use their details for the purposes listed above.
- f. Members are also asked to fill in an optional monitoring form printed on the back of the application form to give us more information about ethnicity, disability or developmental needs. This information is used by us when we buy more toys, and for statistics for grant applications. It does not identify individual children or adults in any way.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Members are asked to complete a new application form when membership is renewed to ensure information is kept up to date

7. Archiving / removal

- a. Each April data from monitoring forms is used to compile statistics and ethnicity reports. The forms are kept for up to an additional 12 months in case data needs to be checked, and are then destroyed. This includes contact information on the reverse of the form.
- b. Email addresses are kept on a mailing list until members ask to be unsubscribed.

8. Security

- a. Personal data is stored securely at the toy libraries and locked away when the toy libraries are closed.
- b. Email addresses are securely stored in an online database with password access control. The software is automatically updated. Changes are backed up 4 times a day.
- c. Access to personal data is limited to toy library staff and IT support and is not shared externally.
- d. When personal data held on paper and cards is deleted it is irrecoverable.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY