

1. Purpose and aims

Sidmouth Lifeboat, in carrying out its duties, will gather, use and retain personal and sensitive information on its employees, volunteers, casualties, service partners and members of the public to support operational and public engagement activities.

This policy exists to ensure that all members of Sidmouth Lifeboat:

- Complies with data protection law and follow good practice
- Protects the rights of individuals whose data is used
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

2. Processing personal data

The General Data Protection Regulations (GDPR) and Data Protection Act (DPA)2018 requires organisations that control the processing of personal data to be open and transparent with how they handle personal data regardless of whether it stored electronically or in hard copy.

Personal data relates to a living individual which allows that individual to be identified. This may include personal, contact and family details, lifestyle and social circumstances, photographs, education and employment details.

Sensitive personal data means personal data consisting of information as to racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health or condition, sexual life, actual or alleged criminal offence.

The following details the GDPR principles and what Sidmouth Lifeboat have put in place:

- [Lawfulness, fairness and transparency](#) – Data should be gathered and used in a way that is legal, fair and understandable
 - Sidmouth Lifeboat have an Information Asset Register (IAR). This register includes, type, where and how it is store, why we are holding the information and how long we will retain it. The IAR is available to all members with this policy and is reviewed annually.
 - As a charity, Sidmouth Lifeboat does not need to comply with any Freedom of Information or Subject Access requests. However, in the spirit of transparency, any reasonable request will be reviewed and answered where appropriate.
- [Purpose limitation](#) – Organisations should only use data for a legitimate purpose specified at the time of collection
 - The IAR covers the types of information we hold and how we communicate this.
- [Data minimisation](#) – Data collected should be limited only to what is required for the purpose stated
 - The IAR covers the different types of information we hold and why we need to hold it.

- Accuracy – Data should be accurate and kept up to date
 - Sidmouth Lifeboat will ensure data is kept accurate and up to date to the best of their knowledge and will act on changes when informed. Members of Sidmouth Lifeboat are to ensure that their personal data held by the charity is kept accurate.
- Storage limitation – Personal data should be stored for as long as is necessary
 - The IAR records the type of information assets we hold and retention period. When no longer required, hardcopy data must be shredded and complete deletion of electronic records.
- Integrity and confidentiality – Personal data should be held in a safe and secure way
 - Members who need to store hard copy personal data will have access to a locked cabinet in the boathouse. They must secure the personal information when not required and ensure no unauthorised people can see it.
 - When personal data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. Any personal data held electronically must, as a minimum, be held in a password protected document or file. No personal data, related to Sidmouth Lifeboat, is to be stored on personal computers.
 - All personal data held must also be held in a secure and off-line backup

3. Responsibilities and expectations

Ian Fletcher, Sidmouth Lifeboat's Data Protection Officer (DPO) is responsible for:

- Keeping members updated about data protection responsibilities, risks and issues
- Reviewing this policy as required
- Providing advice and handling data protection queries
- Dealing with any Subject Access or Freedom of Information Requests
- Dealing with any actual or suspected data breaches.

All Members are responsible for:

- Only accessing personal data in carrying out their duties in relation to the purpose of the charity.
- Following the GDPR principles when accessing and managing personal data
- Reporting any breach or potential breach of personal data to the DPO as a matter of urgency and providing as much information as possible

4. CCTV and Photography

CCTV

The Boathouse has CCTV installed to monitor the exterior and interior of the building 24 hours a day for the following purposes:

4. To assist with the safety and well-being of Sidmouth Lifeboat members and visitors
5. To deter and detect crime
6. To assist in the identification, apprehension and prosecution of offenders

Monitors showing live CCTV images are in the kitchen and upstairs crew room. These areas are restricted to members only.

Third party access and disclosure is permitted only if in accordance with the purpose for which the system is used and will be limited to:

- Police and other law enforcement or regulatory agencies, where the images recorded could assist in a specific enquiry or investigation
- Prosecution agencies
- Relevant legal representatives of people whose images have been recorded and retained
- In exceptional cases, to others to assist in identification of a victim, witness or perpetrator in relation to a criminal incident.

Images obtained by the CCTV system will be stored for a maximum of 30 days before being overwritten. Where an investigation is ongoing, images may be retained for longer.

Photographs and video footage

Photographs and video footage will be taken for purposes of public relations and promoting the activities of the Lifeboat. Only members of Sidmouth Lifeboat will be used in such imagery unless a member specifically asks for their image not to be included. General photographs and/or footage taken as part of an event or activity will not include members of the public unless it is generic enough to minimise the opportunity for recognition.

7. Further information

Any questions or queries regarding this policy or data protection in general should be directed to the Ian Fletcher, Sidmouth Lifeboat's Data Protection Officer, in the first instance.

Further external information can be found on the Information Commissioner's Office website www.ico.org.uk which provides more detail regarding some of the areas covered in this policy.

Approval of Policy

Approved by The Board of Trustees

Phil Shepperd (Chair) on behalf of the Board

This policy is to be reviewed every 2 years. Major changes will need board approval		
Date	Review completed by	Amendment required
June 2018	Initial issue	
November 2021	Ian Fletcher/Naomi Cook	Condensed policy. IAR updated to include CRM and Accounting systems