

# Cripley Meadow Allotments Association Data Protection Policy

## About this policy

Data protection law requires us to tell you why we hold personal data, what we hold, the source of the data, who can access it, and how long we keep it for. We also have to let you know your rights with regard to your personal data. This document sets out those details. It is mainly about Members, including Committee Members, but also applies to others whose contact information we hold (e.g. contractors, landlord, neighbours, environmental agencies).

Some definitions may be useful. The law is called the 'General Data Protection Regulation' or 'GDPR'. There is a lot of information about it on the Information Commissioner's website (<https://ico.org.uk/>).

Cripley Meadow Allotments Association ('CMAA', 'the Association', or 'us') is what is known as a 'Data Controller'.

'Personal data' means as any information by which you can be identified individually, for example, your name or phone number.

We may make changes to this Policy from time to time, to reflect any changes to our use of personal data, or to comply with changes in the Law or regulatory requirements. Substantive changes will be agreed by the Committee and Members will be informed.

If you have any questions about personal data that are not answered below, please contact the Association Secretary and data protection lead, [mandajoyce@hotmail.co.uk](mailto:mandajoyce@hotmail.co.uk).

## Members: The data we hold, how we hold it

**Before you become a member** there is usually email contact between you and the Chair, Treasurer and Secretary. If you do not take up membership, it is not practical to delete these emails but they are not used.

**Once you become a member**, the main personal data we hold is your

- Name
- Address
- Phone number (landline and/or mobile)
- Email address
- Plot number

You are the source of this information, initially from your Membership Agreement, then changes you notify us about. We keep this information in our electronic Membership file. The Secretary keeps the spreadsheet up to date with changes notified by you. Once a year, at membership renewal/AGM time, members are prompted to let the Secretary have any changes to their details. The information held is also printed on the annual invoice sent individually to members, with a reminder to let the Secretary know if it is out of date.

A copy of your original, signed Membership Agreement is retained on paper in a file at the home of the Secretary.

As well as the Membership file, we use other electronic files to manage our finances and audits. These files are currently held on the responsible Committee members' computer and are emailed between Committee members on a need-to-know basis. To minimise the need for emailing back and forth, in the future, it is our intention to migrate them into secure 'Cloud' storage. We will inform

members when this is done.

We use **email** to handle one-to-one administration and communication. For bulk emailing (usually to send out the monthly newsletter), we use an email management tool called MailChimp. (One of the commonest reasons for data breach is an incorrectly typed email address; we avoid this by 'feeding' email addresses directly from the Membership spreadsheet into MailChimp). In GDPR terms, MailChimp is known as a 'Data Processor' and you can find details about its privacy policies [here](#). Note that MailChimp never sells lists or email addresses.

When you come to a working party, we record your name and plot number on paper, which is subsequently transcribed and circulated around the Committee by email.

When you buy something from the Trading Shop, we record the your name, plot number and purchase in a receipt book which is kept at the home of the home of the Shop organiser.

The Committee holds a management meeting once a month. Electronic committee minutes, which may refer to member names and plot numbers, are emailed to Committee members. In the future, we intend to store minutes securely in the 'Cloud'.

Once a year, CMAA holds an AGM. The minutes of the AGM, including names and plot numbers of attendees, are posted on our website.

Our bank account is with Barclay's. Committee members who are signatories on the bank account are able to see Barclays' statement of members' electronic payments.

**When you end your membership** there is likely to be a period during which we still need to contact you, for example, about returning key deposits and clearing your plot. We may therefore continue to use your contact details after your membership ends, but only for the purpose of resolving any outstanding matters.

## **Non-Members: The data we hold, how we hold it**

Members of the Committee hold personal data (largely names and contact information) about non-Members, for example contractors who do work for us onsite, suppliers and other agencies and stakeholders of various kinds (Oxford City Council, Oxford University in relation to Castle Mill, ODFAA, environmental agencies, those whose venues we book...) They may be held electronically and access from home computers, or via Smartphones, or on paper. Where such information is not in the public domain, and has been provided only to manage CMAA business, its use is limited to that business.

## **The legal basis on which we hold personal data**

Data protection law has six possible bases on which to hold personal data. Membership data is held on the basis of '**Legitimate Interests**'. This means in ways one would 'reasonably expect...and which have a minimal privacy impact, or where there is a compelling justification for the processing' (see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>).

The data we hold on non-members, such as contractors and other agencies, may be on the basis of legitimate interests or on a contractual basis.

## **The purposes for which we hold personal data**

The over-arching purpose for holding personal data is the administration of the Association and the custodianship of the Cripsey Meadow allotment site ('the Site'). In detail, this means

- The management of prospective members (waiting list, site tours...).
- The offer of a plot, acceptance of a plot and associated terms. Any moves from one plot to another, additional plots. Relinquishing of plots, and termination of membership.
- Payment for membership, the plot and associated sundries. The management of key deposits. Payment for services.
- The management of permissions associated with plots (e.g. shed and tree permissions).
- Communication about the site and plots (e.g. social events, working parties, policy reminders, gardening advice, shop opening hours...). Communication on individual circumstances affecting the plot holder or plot. Communication about the Association (e.g. AGM). Communication about ODFAA (Oxford and District Federation of Allotment Associations, Oxford's allotment umbrella group), to which CMAA belongs. Communication about contracts, leases, insurance and so on.
- Issues with plots, and enforcement of site and plot rules, including any follow-up required with individual members and co-workers, within and outside of the regular audit process. Urgent contact for plot or site problems.
- Recording the history of plots over time, including characteristics and problems associated with that plot.
- Recording of sales at the Trading Shed.
- Recording Working Party attendance.
- Management of the Site and Association as a whole, for example, meeting minutes, analysis of plot vacancies, late payments, working party hours.
- Engaging and managing external suppliers, service providers and contractors.
- Relationships with key stakeholders (e.g. landlord, insurers, neighbours, environmental agencies) so that we can work together on necessary joint arrangements, handle issues etc.

## **Who can access personal data and how long is it kept for**

### **Ordinary Members**

If you are an ordinary member (i.e. not a Committee member), the only people who have access to your personal details are Committee Members.

Our files are kept for up to 6 years (we have had membership and payment queries after many years). After this, they are archived (see 'The Cripsey Meadow Archive' below).

When a Committee member stands down, they hand over their files to their successor. It is not practical for all old emails to be deleted, but they are not used.

### **Committee Members**

The names of all Committee members are in the public domain. It is occasionally necessary for their contact details to be shared with outside bodies, for example, for the purposes of insurance. The home address of the Secretary is required by MailChimp and is included in the footer of bulk emailings sent from it.

## **A note on confidential / sensitive information**

Members may from time to time share confidential information with the Committee, for example if illness or family problems are making it difficult to maintain their plot, or where financial problems are making payment difficult. This information is only shared between Committee members, and only on a 'need to know' basis.

**CCTV recording cameras** may occasionally be positioned around the Site to manage problems with badgers or antisocial behaviour. Notices will be displayed. Only Committee members, or the appropriate authorities by Committee agreement, will access the footage.

## **The Cripsey Meadow Archive**

Records about Cripsey Meadow allotments and membership go back to Victorian times. This valuable archive is securely held by the Committee's Archive Lead (the Chair, Wendy Skinner Smith). In deciding to continue to contribute personal details to the archive (plot number, name, address, contact details) the Committee have weighed up the interests of current members against those of future researchers and historians. Data protection rules do not preclude us from keeping an archive, so long as it is not used in connection with decisions affecting individuals, nor in a way likely to cause damage or distress. As the archive and access to it is controlled by the Committee, we can and will ensure that this is the case.

## **Your rights**

Data protection law gives you certain rights. Full details are available on the [Information Commissioner's website](#). For a small organisation like ours with relatively simple records, the relevant rights are for you to see what data we hold about you and to correct any errors in it. For Members, when we send you your annual invoice, we include the address and email details that we hold, so that you can check they are correct.

You can contact the Secretary ([mandajoyce@hotmail.co.uk](mailto:mandajoyce@hotmail.co.uk)) at any time to confirm what details we hold on record for you.

You also have a right to complain to the supervising authority, ie. to The Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)).