



# Mendip Cave Rescue

## Data Protection Policy v.1.1

Adopted 20/12/2020

Updated 09/05/2021

### 1. Introduction

Mendip Cave Rescue (MCR) needs to gather, use and retain certain information about individuals in order to operate as a charity. These individuals can include its officers, team members, casualties or other people that MCR are called to assist, emergency services, and other people the organisation has a relationship with, or may need to contact.

The processing of personal data, such as the name, address, email address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to MCR. By means of this data protection policy, MCR would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection policy, of the rights to which they are entitled.

### 2. Policy Purpose

This policy describes how this personal data must be collected, handled and stored to meet MCR's data protection standards and to comply with the law. This data protection policy ensures that Mendip Cave Rescue:

- Complies with data protection law and follows good practice.
- Protects the rights of its officers, members, casualties, emergency services, and other people the organisation has a relationship with or may need to contact.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

The GDPR describes how organisations must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The GDPR sets out seven key principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation

6. Integrity and confidentiality (security)
7. Accountability

These principles lie at the heart of our approach to processing personal data, as set out in this policy.

### 3. Policy Scope

This policy applies to all officers, trustees, members and volunteers of MCR. It applies to all data that MCR holds relating to identifiable individuals which depending on the individual can include:

- Names of individuals
- Postal and email addresses
- Telephone numbers
- Date of birth
- Medical history
- Next of kin contact details
- Training and qualifications held by the individuals
- Photographs

MCR is required to gather and hold this information in order to efficiently operate as a cave rescue charitable organisation. Data that MCR gathers on various individuals is as listed below:

**Data held on MCR members:**

Name, contact details including postal address, email address and telephone numbers, date of birth, next of kin contact details, photographs, training, skills and qualifications.

**Data held on individuals that MCR assist:**

Name, contact details, age, medical history, next of kin contact details.

**Data held on members of the general public:**

None.

### 4. Responsibilities

All officers, trustees and members are responsible for the security of data, accounts and systems under their control. Sharing of accounts or passwords is not permitted including with other users of the system. Shared accounts should not be used wherever the technology permits.

Everyone who volunteers for MCR has a responsibility for ensuring that data is collected properly, the data is accurate, kept securely, updated as requested, and is handled, retained and disposed of appropriately. Each individual that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

The MCR Information Governance Officer is ultimately responsible for ensuring that MCR meets its legal obligations including:

- Keeping up to date about data protection responsibilities, risks and issues.
- Dealing with requests from individuals for access to the data MCR holds about them (also called 'subject access requests').

- Retaining a record of data protection breaches, and ensuring a review takes place, and liaising with the Information Commissioners Office (ICO), or other bodies as appropriate.
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards for a small charity. Where possible electronic data should be stored in an encrypted format.
- Implementing and checking that appropriate security measures are in place.
- Ensuring data is collected in accordance with legislation and consent is obtained where applicable.

## 5. Sharing Data with Third Parties

Everyone who volunteers or works for MCR has a responsibility for ensuring that any data held by MCR is only shared with third parties under very limited circumstances. No data will be shared with organisations outside the European Union without the consent of the individual concerned.

### **Shared data held on MCR members:**

British Cave Rescue Council and other cave rescue teams, SARCALL and emergency services personnel.

### **Shared data held on individuals that MCR assist:**

Emergency services personnel, anonymised summary data is shared with British Cave Rescue Council (and potentially other organisations) for reporting purposes.

### **Shared data held on members of the general public:**

No data is held on members of the general public.

## 6. Data Accuracy

The law requires MCR to take reasonable steps to ensure data is kept accurate and up to date:

- It is the responsibility of all volunteers who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.
- Data will be held in as few places as necessary.
- Data should be updated as inaccuracies are discovered.

## 7. Data Retention

The law requires MCR to take reasonable steps to ensure that data is only retained whilst the data has value and is of use to the MCR. Any data that is no longer useful to MCR should be deleted, although anonymised summary information will be retained in perpetuity unless specifically requested otherwise. Starting from the date that MCR was registered as a charity (16<sup>th</sup> November 2020), data will be retained for the following periods:

### **Retention of data held on MCR members:**

Data will be deleted five years after membership ceases.

### **Retention of data held on individuals that MCR assist:**

Data will be deleted 26 years after the date of the incident.

### **Retention of data held on members of the general public:**

No data is held on members of the general public.

## **8. Data Loss or Data Breach**

The law requires that any data losses or data breaches must be reported to the Information Commissioners Office within 72 hours of being detected. MCR Officers must report any suspected losses or breaches to the MCR Information Governance Officer immediately, who will inform the MCR executive and trustees and decide the appropriate course of action. If a report to ICO is to be made, this will be made by MCR Information Governance Officer.

## **9. Subject Access Requests**

All individuals who are the subject of personal data held by MCR are entitled to:

- Ask what information MCR holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how MCR is meeting its data protection obligations.

If an individual contacts MCR requesting this information, this is called a subject access request. Subject access requests from individuals should be made by email, addressed to the MCR Information Governance Officer. The MCR Information Governance Officer shall verify the identity of anyone making a subject access request before handling over any information. The MCR Information Governance Officer must provide the relevant data within one month unless it is particularly complex.

All charities that undertake data processing activities must be registered with the Information Commissioner Office. MCR is registered with the ICO and its registration number is ZA344387.

## **10. Contact**

Contact details for the purposes of the GDPR, other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Mendip Cave Rescue  
Brycombe  
New Road  
Draycott  
Cheddar  
BS27 3SG  
UK

Email: [information@mendipcaverescue.org](mailto:information@mendipcaverescue.org)  
Website: <https://www.mendipcaverescue.org>