



NORTHAMPTONSHIRE NEIGHBOURHOOD WATCH ASSOCIATION

Data Protection Policy

1. Data Protection Policy

- 1.1 This policy forms Northamptonshire's Neighbourhood Watch Association's (NNWA) commitment to the safeguarding of personal data belonging to Members and Volunteers. The aim of this policy is to recognise the rights and obligations of NNWA Officers, Members and Volunteers with respect to personal data obtained and held by, or on behalf of, the NNWA.
- 1.2 The contents here-in are written to align with the requirements stipulated within the UK Data Protection Act, 2018 and in addition, the Policies and procedures of the national Neighbourhood Watch Network (NWN).

2. Introduction

- 2.1 Northamptonshire Neighbourhood Watch does not normally retain personal details beyond the names and contact details of Executives, Members and Volunteers. All other data is normally held, managed and secured within the national Neighbourhood Watch Network Alert system, currently managed by VISAV Ltd.
- 2.2 However, in exceptional circumstances where the NNWA does elect to process the personal data of individuals, such processing will be regulated in accordance with the UK Data Protection Act 2018, the General Data Protection Regulation 2018 (GDPR) and, if deemed appropriate, in voluntary compliance with the Fundraising Regulator Code of Practice 2018.

3. Scope

- 3.1 This policy applies to all Northamptonshire Neighbourhood Watch Association Executives, Members and Volunteers. This Policy aims to promote the highest standards in the handling and storage of personal information and so protect the individual's right to privacy.
- 3.2 The NNWA Association Executive Committee will appoint a "Data Protection Lead", who will normally be the Deputy Vice Chairperson.

4. The Data Protection Principles

- 4.1 Northamptonshire Neighbourhood Watch Association fully endorses and adheres to the principles of Data Protection, and will strive to ensure that personal data shall be:
 - processed lawfully, fairly and in a transparent manner in relation to individuals;
 - obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
 - adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed



NORTHAMPTONSHIRE NEIGHBOURHOOD WATCH ASSOCIATION

Data Protection Policy

- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- Personal data shall not be transferred to any country, territory, entity or Organisation outside of Northamptonshire Neighbourhood Watch Association or the national Neighbourhood Watch Network.

6. Data Breach

6.1 If NNWA experiences a breach of personal data controlled by NNWA, whether held on the Neighbourhood Watch Register on the Alert System that is controlled by VISAV or otherwise, the NNWA Data Protection Lead shall immediately notify the NNWA Chairperson.

6.2 Once the data breach has been initially quantified and the seriousness initially determined, the Data Protection Lead and NNWA Chairperson shall notify the designated national Neighbourhood Watch Network (NWN) Data Protection Lead and VISAV directly.

6.3 It is the responsibility of the national Neighbourhood Watch Network Data Protection Lead to determine whether there is a statutory need to notify the Information Commissioners Office (ICO)

7. Individuals' rights

7.1 Personal data shall be processed in accordance with the rights of data subjects;

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object;
- The right not to be subject to automated decision making, including profiling.

8. Personal Information covered by this policy

8.1 This policy covers any information that relates to living individuals which is held on computer or in hard copy format. For example, this may include information such as name, address, date of birth and data about the individual or any other information from which the individual can be identified.



NORTHAMPTONSHIRE NEIGHBOURHOOD WATCH ASSOCIATION

Data Protection Policy

9. Responsibilities

9.1 All Northamptonshire Neighbourhood Watch Association Executives, Members and Volunteers are responsible for:

- Ensuring that the retention and processing of personal data, including research data, is compatible with the data protection principles.
 - Ensure that paper documents containing personal data are securely stored in a lockable cabinet at a specified location, and that key(s) used to lock them are retained securely in the possession of the dedicated (appointed) individual.
 - Ensure access to files that contain personal data is restricted on a strict need to know basis.
 - Wherever possible, convert paper records to electronic form and restrict access to only those that have been identified as requiring it.
 - Password protect files that contain sensitive information in relation to individuals that may not be appropriate for all NNWA members to access.
 - Employ strong passwords to ensure the personal data held on computers remains secure.
 - If the printing of personal details is deemed necessary, ensure that it is managed securely, in compliance with this Policy, from print-out, through use until either stored securely or destroyed post use.
 - Completing any relevant Data Protection training that may be made available.
- Raising any concerns in respect of the processing of personal data with, initially, the Data Protection Lead and there-after, if necessary, with the NNWA Chairperson.
- Passing on all subject access requests for personal data to the Data Protection Lead.
- Reporting unauthorised disclosures of personal data to the NNWA Data Protection lead.
- Ensuring that any personal data provided to the organisation is up to date

9.2 Compliance with this Policy and the discharge of the responsibilities here-in shall be confirmed at the Annual General Meeting of the NNWA Executive meetings to all members present.

9.3 The NNWA Data Protection Lead will normally be the NNWA Deputy Chairperson.

10. Access to Personal Data

10.1 Data subjects have the right to access their personal data held by NNWA. Any request must be submitted in writing to the NNWA Data Protection Lead.

10.2 Copies of any information held will be provided to the individual, within twenty-eight (28) days of the request being submitted.

10.3 Neighbourhood Watch Network will not charge for any data subject access requests.



NORTHAMPTONSHIRE NEIGHBOURHOOD WATCH ASSOCIATION

Data Protection Policy

11. Monitoring

11.1 It may sometimes be necessary for NNWA to monitor information and communications, which may include personal data. NNWA will endeavour to inform members and volunteers of the reasons prompting this should it happen.

12. Third Party Access

12.1 In certain circumstances Data Protection legislation provides for disclosure of personal data to certain organisations, without the consent of the data subject. Requests for such disclosures from third parties, such as the police, UK Border Agency etc. will be made in writing and will be handled by the Data Protection Lead in consultation with the Chairperson.

13. Records Management

13.1 When records are no longer required for whatever reason, they will be destroyed or disposed of securely and confidentially. All paper documents containing personal details shall be shredded.

14. Policy and Procedure(s) Approval

14.1 This Data Protection Policy will be reviewed for adequacy every two (2) years and any updates, where required, will be made. The revised document will be reviewed and approved by the Executive Committee and placed into use until such time as the document can be approved by Members at the earliest normally occurring opportunity.

Acceptance and approval shall be recorded in the appropriate record of the meeting minutes.

14.2 The review process may be fore-shortened where it has been determined that the document is no longer fit-for-purpose and/or fails to fully meet a defined, strategic need, in its present form.

14.3 The appending of the signatures of the Northamptonshire Neighbourhood Watch Association Executive Committee below, acknowledges their understanding of, and agreement to comply with, the Data Protection Policy and the guidelines here-in.

<u>ISSUE DATE:</u> 01-July-2025 <u>NEXT REVIEW DATE:</u> 30-June-2027

15. NNWA Executive Committee

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<u>NAME:</u> Andrew Crisp	Nicholas Hamp
<u>ROLE:</u> Chairperson	Vice Chairperson
<u>DATE:</u> 01 st July 2025	01 st July 2025

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<u>NAME:</u> <i>Currently vacant</i>	Paul Goddard
<u>ROLE:</u> Secretary	Treasurer
<u>DATE:</u> <i>write date</i>	01 st July 2025