



## **DATA PROTECTION COMPLIANCE**

### **Introduction**

The London Borough of Sutton Neighbourhood Watch Association (Sutton Neighbourhood Watch) is aware of its obligation to comply with the requirements of the Data Protection Act 2018 (DPA).

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation which came into force from 25 May 2018.

The General Data Protection Regulation has been retained in UK law and will continue to be read alongside the Data Protection Act 2018, with technical amendments to ensure it can function in UK law. The Information Commissioner remains the UK's independent supervisory authority on data protection.

### Assessment of Risk

Accordingly; Sutton Neighbourhood Watch has taken a risk based approach to determine the measures necessary to comply with the Data Protection Act.

Sutton Neighbourhood Watch does not hold Business, Financial, or Sensitive personal data; and the personal data that is held is limited to Name, Telephone Number and Email Address.

The harm severity (consequence) that could result from a data breach has been assessed as Negligible to None.

and

The probability (likelihood) of any data breach occurring has been assessed as Remote.

Therefore, the overall level of risk is assessed to be Very Low.

Consequently, the measures taken by Sutton Neighbourhood Watch are commensurate with that level of risk and the requirement to comply with the DPA.

### Registration self-assessment

Under the Data Protection Act, individuals and organisations that process personal information need to register with the Information Commissioner's Office (ICO), unless they are exempt.

N.B. this exemption, is an exemption from Registration - not Compliance.

## Self Assessment by Sutton Neighbourhood Watch

Sutton Neighbourhood Watch completed the Information Commissioner's self assessment to determine if we are exempt from registration with the following result:

### Registration self-assessment ICO

<https://ico.org.uk/for-organisations/register/self-assessment/>

### Registration self-assessment

**1. Do you use CCTV for the purposes of crime prevention?**

**Answer: No**

**2. Are you processing personal information?**

'Processing' means doing any of the following with the information:

- obtaining it;
- recording it;
- storing it;
- updating it;
- sharing it.
- 'Personal information' means any detail about a living individual that can be used on its own, or with other data, to identify them.

**Answer: Yes**

**3. Do you process the information electronically?**

Answer 'Yes' if you process the information using computers or any system that can process the information automatically, including CCTV systems, digital cameras, smartphones, credit card machines, call logging and recording systems, clocking machines and audio-visual capture and storage systems.

**Answer: Yes**

**4. Is your organisation responsible for deciding how the information is processed?**

Answer 'No' if you only process information on behalf of another organisation.

**Answer: Yes**

**5. Do you only process information for one of the following purposes?**

- Judicial functions;
- domestic or recreational reasons (i.e. information relating to a hobby); or
- to maintain a public register (i.e. you are required by law to make the information publicly available).

**Answer: No**

**6. Are you a not-for-profit organisation that qualifies for an exemption?**

Answer 'Yes' if your organisation was established for not-for-profit making purposes and does not make a profit. Also answer 'yes' if your organisation makes a profit for its own purposes, as long as the profit is not used to enrich others. You must:

- only process information necessary to establish or maintain membership or support;
- only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
- only share the information with people and organisations necessary to carry out the organisation's activities. Important - if individuals give you permission to share their information, this is OK (you can still answer 'yes'); and
- only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration.

**Answer: Yes**

### Result

**You are under no requirement to register.**

Some not-for-profit organisations are exempt and based on the information you have provided you do not have to register with the ICO.



## DATA PROTECTION POLICY

### How The London Borough of Sutton Neighbourhood Watch Association complies with the Data Protection Act 2018.

- 1 We are a "not for profit" Association and comply with all the requisite conditions to be exempt from the requirement to register under the Data Protection Act 2018.
- 2 To comply with the Regulation we will:
  - 2.1 only collect information that we need for a specific purpose;
  - 2.2 keep it secure;
  - 2.3 ensure it is relevant and up to date;
  - 2.4 only hold as much as we need, and only for as long as we need it;
  - 2.5 allow the subject of the information to see it on request.
- 3 For the registration and assignment to watches of members:
  - 3.1 we require the names, but will accept pseudonyms.
  - 3.2 we require the full addresses.
- 4 For communication purposes we ask for members' email addresses and telephone numbers.
- 5 All members, who are 18 years of age or older, gave permission for their details to be held on the understanding that the information will only be used to achieve the objectives of Sutton Neighbourhood Watch in partnership with the Metropolitan Police.
- 6 All members agree to respect and preserve the confidentiality of any information used by them in any activities they undertake on behalf of Neighbourhood Watch.
- 7 As a not for profit Association that qualifies for an exemption, we will:
  - 7.1 only process information necessary to establish or maintain membership or support;
  - 7.2 only process information necessary to provide or administer activities for people who are members of the Association or have regular contact with it;
  - 7.3 only share personal information with the Metropolitan Police except with the express permission of the individual;
  - 7.4 only keep personal information while an individual is a member or supporter or as long as necessary for member/supporter administration;
  - 7.5 only keep personal information of non members who we have an active association with of with whom we have ongoing issues.
- 8 All members will be required to comply with this policy.
- 9 Any member who fails to, or is unable to, comply with this policy will not be allowed access to personal data.

**This policy which supersedes the Data Protection Policy 27 March 2018, was approved by the Committee of the Association on 16 March 2021.**