Ipswich & District Talking Newspaper (Sound On)
Charity no. 272773.
Data Protection and Privacy Policy
Issue 1.2
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This document outlines how Sound On uses the Personal Data of Listeners and Volunteers in accordance with the General Data Protection Regulation (GDPR). Section 1 contains the principles of the regulation, and Section 2 shows how it is implemented within Sound On.

1. Principles

The General Data Protection Regulation includes the following principles retrieved from https://www.legislation.gov.uk/eur/2016/679/article/5 in February 2023.

Article 5 Principles relating to processing of personal data

Personal data shall be:

A. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

B. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');

C. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

D. 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 ('accuracy');

E. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational

measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

F. 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 ('integrity and confidentiality').

The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').
(Note: The reference to Article 89(1) in the paragraphs above, can be followed up at https://www.legislation.gov.uk/eur/2016/679/article/89 and seems to be solely concerned with archiving of data. As Sound On doesn't require Personal Data to be archived beyond the time when it is still required for day-to-day operation, this would seem not to be relevant to our requirements.)

2. Sound On's Implementation of the Principles

The following paragraphs outline the way in which the above principles are implemented by the Ipswich and District Talking Newspaper (Sound On).

2.1. How Personal Data is used by sound On

Personal Data, for the purposes of the principles defined above, refer to the information we require in order to provide our services to our listeners. This includes listeners' names, addresses, e-mail addresses (if available), birth date, telephone numbers and details next of kin or carer. This data is collected from listeners when they subscribe to receive our recordings.

(Note: The provision of birth date is optional, but is needed in some circumstances to uniquely identify some listeners who share a common name (e.g. John Smith). If supplied, it is also used for the announcement of forthcoming birthdays in a given week's Sound On edition.)

More limited Personal Data is also required from volunteers for the purposes of arranging the rota and sharing other information required for the smooth running of Sound On. It consists of contact address (email or postal) and a contact telephone number, and is collected from volunteers when they join Sound On.

Sound On is not able to support listeners or volunteers who are unwilling for their Personal Data to be held for the purposes described.

Listeners or volunteers wishing to know what personal data is held by Sound On should contact the Listener or Volunteer Co-ordinator as appropriate. This ensures data transparency as required by Paragraph 1.A of the Principles above.

The data that is collected is used for the administration of service delivery, the communication of information to listeners and between volunteers, and the organization of events such as meetings as per paragraph 1 B.

2.2. How data is stored, shared and who has access to it

Listener-data is stored in digital form on a Personal Computer held by the Listener Co-ordinator, while volunteer-data is similarly held by the Volunteer Co-ordinator as per paragraph 1.E. Data is removed as soon as it is no longer required, either when a listener cancels service from us, or when a volunteer leaves Sound On. Sound On does not archive personal data beyond the point where it is so required. Where postal rather than digital communication is the only option, communications are handled by the Volunteer Co-ordinator. The data is held temporarily by the printing organisation while the task is underway, and then deleted. Limited personal data is also passed to the IP-City Centre administration team to authorise access for volunteers, to the building where this is required by their role. With the above limited exceptions, data is not passed on by Sound On to any other organization, and only those volunteers that require access to personal data in order to fulfil their role (Paragraph 1.B) may have access to it.

2.3. Responsibility for ensuring compliance with relevant laws and regulations

Data is kept accurate and up to date by the Listener and Volunteer Co-ordinators respectively (1 D). Listeners and volunteers wishing to inform Sound On of relevant changes to their personal data (contact details etc), should contact the Listener or Volunteer Co-ordinator as appropriate. Personal Data is protected in the following ways: in digital form it is password protected, in written form it is under the supervision of the Listener or Volunteer Co-ordinator as appropriate (1 F).

For the purposes of Article 5 Paragraph 2 above, the Secretary of Sound On's management committee fulfils the role of Data Controller. The Secretary holds confirmation in the form of email or signed statement from Sound On volunteers having access to Personal Data of other volunteers, and of listeners, that they will not pass on the data in any way other than those described in subsection 2.2 above.

Document History

Version	Date	Changes Made	Review Date
Issue 1.1	August 29 2023	Document Identification and Document History	Changes agreed at Committee Meeting on 27/6/2023
1.2	2/11/2026	Volunteer Co-ordinator Role Clarified.	14/04/2026