

# **Tiratanaloka Data Protection Policy**

Tiratanaloka Retreat Centre (part of Triratna Sarana, charity number 1014180) gathers and holds information on women who have asked for ordination into the Triratna Buddhist Order and who attend retreats at Tiratanaloka. This information is for the purposes of administration and retreat planning. We will only hold information on individuals as long as is necessary and make individuals aware of their rights when they agree to our privacy policy on booking on a retreat.

This document outlines our policy in relation to how we securely hold and manage people's data in line with current Data Protection and GDPR legislation and serves as a basis for induction training for all those who manage personal data for Tiratanaloka retreat centre.

This document is to be read in conjunction with our Web Privacy Policy, which can be found on our website: <https://www.tiratanaloka.org.uk/policies-and-procedures>.

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## **1. Keeping personal data secure and safe**

### **Paper records:**

All our paper records holding information about individuals are kept in a locked office, only accessible by the Tiratanaloka team and those supervised by them.

### **Electronic records:**

All computers are password protected

Tiratanaloka email accounts are password protected.

Cloud storage used such as Dropbox are also password protected.

Backed up data on external hard drives is kept in the locked office.

### **Safeguarding records:**

Due to the highly sensitive nature of these records, they are kept highly secure.

Paper records are kept in a locked safe in a locked office, accessible only to the safeguarding officer.

Confidential emails are transferred into encrypted documents and the original emails deleted.

We are required to keep safeguarding records for 50 years and in order to ensure we do so, in the eventuality that the charity ceases we would pass on our records for secure storage with another Triratna charity.

## 2. Retention of Personal Data

**We hold personal information on individuals in the following areas:**

### **Ordination training records**

#### **Paper records:**

Ordination training paper records – e.g. Ordination request letters, letters from retreatants, notes made by the team for continuity purposes after retreats.

Used for overseeing the ordination process of individuals.

We will hold these until an individual is either ordained or withdraws their Ordination request. We will destroy the paper records at that stage. An ordination request may be withdrawn by us if we don't hear from someone for a number of years and are unsuccessful in tracking them down, or we hear from another order member that the person no longer wishes to pursue ordination.

The only exceptions to this are where an individual requests to receive the records back themselves or gives prior permission for a third party (e.g. their Preceptor) to receive the records.

#### **Electronic records:**

e.g. emails commenting on an individual's Ordination Training process/ database records

We will only store emails about an individual, where they are themselves aware of the content of the email. Confidential emails will be deleted after reading.

Database records on individuals are kept until they are either ordained or withdraw their ordination request, at which time they are deleted from our database of women in training for ordination. If the person has been ordained, please refer to the Order Office Data Protection Policy.

### **Tiratanaloka Unlimited Project**

Tiratanaloka Unlimited is a new project to fund raise for a bigger Tiratanaloka. Future Dharma are processing any donations received from donors for Tiratanaloka Unlimited on behalf of Tiratanaloka. . After this appeal they will store the information from donors for the time legally required and then they will delete that information.

Future Dharma's communication officer will send us information of subscribers, whom we will add to our mailing list. Individuals who have subscribed for updates on the progress of the Tiratanaloka Unlimited project will receive regular updates from us. Individuals can Unsubscribe from the newsletter at any time. Instructions for unsubscribing from emails will also be included in each email communication we send.

### **Financial Records:**

#### **General accounts paper records: Receipts, invoices etc.**

Held for 7 years for purposes of e.g. budgeting, tracing information on suppliers etc.

Shredded after 7 years

#### **Paper and electronic information:**

Used for tracking payments made by bank transfer and donations made to our bursary fund. Bank transfer payment spreadsheets hold the person's name, the retreat they are attending and the amounts paid. Bursary donation spreadsheets hold the person's name, the amount they pay monthly (if applicable), their gift aid status and a record of donations made.

How we store them securely: paper records kept in locked office, Electronic records on password secured computer network, external hard drive for backup – all within locked office as well as password secured Dropbox.

These are kept until the end of the year when the payments are made (financial year in the case of bursary donations). At that point, ongoing donations are transferred to a new sheet (either paper or electronic) and details of donors no longer giving are deleted from electronic records. Paper copies of bursary donation spreadsheets may be kept for a further year until all eligible gift aid has been reclaimed.

Gift aid spreadsheets submitted to HMRC are kept for 6 years and then destroyed.

### 3. Requests to disclose what data we hold on individuals

If an Individual requests to know and receive what information we hold on them, we would gather together all the information held in the areas detailed in the policy above and provide them with a printed record of this information by post.

In the case of safeguarding information, we would only share such information we hold about an individual when it is considered safe to do so, accords with safeguarding best practice and doesn't include information about any other individual. In such circumstances, the Tiratanaloka safeguarding officer would decide on what is shared and seek expert advice as necessary. This decision making process would be logged securely.

Policy written by:

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Updated by Karunadhi April 2023

	Document History	
Version 1.0	May 2018	First version
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