

# Impact Hub Bradford CIC Data playbook

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## Principles

Impact Hub Bradford CIC is the data controller of the data we process. This means that we are required by law to ensure that everyone who processes personal data and special categories of personal data during the course of their work with us does so in accordance with the data protection legislation, including the UK GDPR principles. These are:

- **Principle 1 - Lawfulness, Fairness and Transparency** - Personal data must be processed in a lawful, fair and transparent way.
- **Principle 2 - Purpose Limitation** - The purpose for which the personal information is collected must be specific, explicit and legitimate.
- **Principle 3 - Data Minimisation** - The collected personal data must be adequate and relevant to meet the identified purpose.
- **Principle 4 - Accuracy** - The information must be accurate and kept up to date.
- **Principle 5 - Storage Limitation** - The personal data should not be kept longer than it is needed, in a form that can identify individuals.
- **Principle 6 - Integrity and Confidentiality (security)** - The personal data must be kept confidential and secure and only processed by authorised personnel.
- **Principle 7 - Accountability Principle** - requires us to take responsibility for what we do with personal data and we must be able to demonstrate how we comply with the other principles
  
- **Open By Default**
  - By taking an open by default approach we need a good reason not to share our data, which informs what data we should collect. Based on our history of

being transparent, we decided an **Open By Default** principle aligns with this and our company values of Openness, but also forces us to think through the implications and ethics of if our data is openly available, what responsibility do we have in managing and collecting sensitive things like gender and race. Our Open by Default approach aligns with data protection principles 1, 2 and 3.

- **Data Leadership**
  - We will be a reference point for the sector. We will strive for excellence and intention in our data practices. We will push partners to strive for excellence.
- **Humane Data Practices**
  - Our work is about People. Taking a humane approach to data collection means we will make informed decisions about what data we collect. We will be non-extractive from the communities and people we work with. Our practices will align with principles 2 and 3.
- **Ownership**
  - We will be clear about who owns data in our relations and what the boundaries are with our partners. Our Data Protection Policy will outline and define data owners in each service area that processes that data.

All employees must comply with these principles and rules at all times in their information-handling practices. We are committed to ensuring that these principles and rules are followed, as we take the security and protection of data very seriously. You must inform management immediately if you become aware that any of these principles or rules have been breached or are likely to be breached.

## Questions

*These are the questions at the centre of your data work. They should have been tested using the [Data for Action question approach](#)*

Headline question	Sub questions	What data will help to answer these questions?
<b>What is the journey of a member?</b>	Does upselling work? Do members take up add-ons? What impact are we creating for members? Which programmes lead to an outcome?	<ol style="list-style-type: none"> <li>1. Form is filled out on website</li> <li>2. Email sent to hello.bradford</li> <li>3. Somaiya, Afnan or Ayub pick up the email and they will explain membership and invite the customer via email.</li> <li>4. Nexodus link to register is sent</li> <li>5. Ayub asks for Due</li> </ol>

		<p>Diligence docs when registration is complete</p> <ol style="list-style-type: none"> <li>6. Payment is after the first month</li> <li>7. BYB have 6 months free virtual address with a discount code</li> </ol>
<p><b>How do we measure our progress towards Net Zero and sustainability?</b></p>	<p>What is our energy use?          What reductions have we made in energy use?          What impact have we made on active transport?          How has our procurement practices and supply chain improved our progress towards net zero?</p>	<p><a href="https://docs.google.com/spreadsheets/d/1Ccp4M4EhADYnMM13ftodpR_IRNHMN3js1CrRoSiy7q4/edit#gid=794460184">https://docs.google.com/spreadsheets/d/1Ccp4M4EhADYnMM13ftodpR_IRNHMN3js1CrRoSiy7q4/edit#gid=794460184</a> Net Zero Emissions Action Tool for Impact Hub Bradford</p>
<p><b>What are our reporting requirements?</b></p>	<p>What are the OKRs for the board?          Are these the same as for Impact Hub global?          What are the OKRs and outputs for our partners and funders?          How well aligned are all these reporting requirements?</p>	<p>Bi-annual global impact report to impact hub global.</p> <p>People we've worked with, members, events, finances, workshops.</p> <p>Social enterprise regulator report annually.</p> <p>Annual HMRC accounts.</p> <p>Partners and funders have different reporting frequencies.</p>
<p><b>What are our Products and how do we manage them?</b></p>	<p>Do our products make a profit?          Are our products used?          Do our products support the members?          Who are our products for?          When do we end a product?</p>	<p>Membership          Space hire          Consultancy          Programmes</p> <p>Some products make profit and those help us to deliver the products that don't.</p> <p>Coworking membership and Space hire are under utilised due to resource not being put towards it</p> <p>When the funding or programme comes to an end, the product ends.</p>

<p><b>Who are the communities, partners and people we're serving?</b></p>	<p>Which communities do we work with?          Are we making informed decisions on which communities to work with?          Are we effective in supporting those communities?</p>	<p>Racially minoritised          Women          Working class          Bradford district</p> <p>Working with communities that historically have been underserved.</p> <p>We are effective but feel like we have potential to do a lot more.</p>
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## Objectives

*These are the objectives for your data and data work. Focus on clear objectives related to your questions. Determine which questions and sub questions you will prioritise.*

- Improve the quality and consistency of data. We will carry-out regular compliance testing (at least annually) on the data we collect, to ensure that the quality is not compromised, it is accurate, relevant and still fit for purpose.
- Have clear ownership of data internally. Our Data Protection Policy defines our data owners. These are usually heads of the service areas/business functions. They must have managerial responsibilities and be in a position to make decisions on behalf of the organisation.
- Have clearly defined data standards across our products. The Company will review its records and in particular employees' personnel files on a regular basis to ensure they do not contain a backlog of out-of-date or irrelevant information and to check there are lawful reasons requiring information to continue to be held.
- We will only collect data that leads to action, ensuring our compliance with data protection principles of purpose limitation and data minimisation.
- Improve training and understanding of data across the team
- Communicate with data regularly, through adequacy and compliance testings, and adhering to data retention principles. We will not keep data longer than we need it for. Any data that is no longer needed will be securely destroyed according to our data retention schedule.
- Know our members and our communities better. We will have processes in place that encourage our members and communities to communicate with us, any changes in their personal data and other circumstances that will help us to understand them and work with them better.
- Know which products are working

<i>Objectives</i>	<i>Complete?</i>
Security and UK GDPR compliance in line with policy and legislation	Yes
Clearly defined processes that collect data	Yes
Using the data that has been collected to inform ourselves, partners and the public	Yes

## Actions

*This is where you lay out what this data work will allow you to do and improve in your organisation. Data should be about taking action. What actions will you take? This will be evolving!*

<i>Action</i>	<i>Why?</i>	<i>Complete?</i>
Creation of data flows between systems	Understand how data flows better	Yes
Access to reporting mechanisms	Report on data for Programmes and "Products"	Yes
Performance improvement for staff	Effective and efficient delivery of the funded programmes	Yes
Cost reduction from inefficient spend	Effective use of funding and saving the organisation funds which can be used for business and staff development	Yes
Employee productivity	To ensure delivery of current programs and future funding	Yes
Data driven decision making	Fact based decisions by the CEO and the board of directors will lead to effective delivery of the organisation vision and mission	Yes

## Links to other strategy or goals

*This is where you lay out how this data work will support your wider strategies and goals*

**Where does data and action support your organisational strategy?**

If a staff member leaves, we have a process and procedures in place to ensure that we are protected. We have an effective leavers process which is in place and within the employee handbook which details the procedure that all devices containing personal data belonging to IHB are safely returned and no longer accessed at the end of the employment. The data we collect from the different programmes and projects ensures we are delivering impact to the community we support.

### **Where does data and action support your fundraising strategy?**

We need to make informed decisions such as demand from the communities we serve, ensuring that we deliver what is needed. There is a feedback mechanism for them to inform them of the next fundraising round. Evaluation of programmes based on the qualitative and quantitative data from the output of the programme.

### **Where does data and action support your theory of change or impact goals?**

Each programme and project that we deliver is monitored by quarterly reports for both funding purposes and for the IHB board to have all the data at hand to make the decisions necessary for the programme to deliver the impact that is required. The reports are detailed with data related to the targets and goals and what has been achieved to that point. The programme manager can then propose any necessary changes to the delivery method to ensure that we are on track for our theory to change. Some of the projects are delivered on an iterative model of learning which allows for the project to be adjusted for effective delivery.

## Tools and technology

*The tools and technology you will use to help you answer your questions*

### **What tools will you use to collect data?**

Mailchimp, Google Forms, Eventbrite, Nexodus, Hubspot, BrightHR.

### **What tools will you use to analyse data?**

Google Analytics, Hubspot

### **What tools will you use to communicate data?**

Email, Google Drive, Teams, Zoom, Google Meet, monthly & quarterly reports

### **How will you visualise data?**

Google DataStudio, graphs, charts, infographics, powerpoint

The current Impact Hub tech stack is outlined below. The system in bold will be most important from a data perspective.

**Personal Productivity** - Google Workspace, Dropbox\*, Office 365\*, Zoom

**Human Resources** - Peninsula, BrightHR

**Member Management** - Nexodus

**Space Management** - Nexodus

**Event Management** - Eventbrite, Paypal

**Financial Management** - GoCardless

**Publishing** - MailChimp, Wordpress, Twitter, LinkedIn, Instagram, Facebook, Youtube, Google Analytics

**Project & Programme Management** - Programmes Standard Paperwork, client management databases

Review the role your tech stack currently plays in helping to answer your questions.

- Focus on standardising data collection to meet multiple needs.
- Automate data connections where possible
- Replace systems where vital

## Data architecture

*How you will design and organise data systems and infrastructure to support answering questions.*

- **Start with the data you currently collect. Does this data help to answer any of the questions you have? Is it accurate? How could you improve accuracy?** The data collection is subject to the needs of each individual requirement that is needed within the organisation which includes member and space management, event management, financial and project management. Data collection is designed to meet any requirements from the funding organisations and therefore all data has to be accurate especially around financial management. Data architecture looks at the end goals of the data collection and then designs the capture element to meet that.
- **Do you collect the same data across multiple products and platforms? If so, are the formats and categorisations the same?** Yes we do for example name, address, email address, organisation, age, gender, ethnicity, disability etc.
- **How will you improve standardisation across products to answer questions related to members and communities?** The data we collect is fairly generic in terms of the categories above and this could relate to both members and communities. The only difference being for members there may be organisational details and legal structures.

## Communication

*How you will communicate the data, the answers and the progress you make*

- **Will you have monthly meetings to discuss the progress on answering key questions?** We have weekly, monthly and quarterly team and project meetings to ensure that data is shared and communicated to all staff giving them the exact state of play with internal organisational data and also project data.

- **Will you have regular slots to discuss what the data is telling you?** Yes, data discussion is crucial for organisational planning and for project delivery. Data is discussed in great detail to ensure effective and efficient use of resources and making necessary changes.
- **Will you have standard ways to communicate with the board, partners and team?** Yes, the meetings are planned with agenda items to discuss progress reports and the current data; this allows for a standard way of reporting and presentation of data to the different audience of board, partners, team and stakeholders.

## Governance

Our Data Protection Policy gives more information on our policies and procedures for managing and protecting data, guidelines for handling sensitive information, rules for access to data, and protocols for data retention and disposal. Details such as

- **Who has access to data in the organisation?** All the programme managers have the relevant data for their projects. Reports are produced on a monthly or quarterly basis which are then submitted to the CEO and the funding organisations. The CEO provides the progress of programmes using that data to the IHB board of directors on a 6 weekly cycle of board meetings.
- **Who is responsible for permissions?** The CEO is overall responsible for the permission to the data and the information collected. This is controlled through allowing access to the relevant employees that are linked to the projects that they are delivering. This is done through google drive.
- **Who is responsible for data disposal?** The CEO is overall responsible for the disposal of data that is no longer required in terms of securely archiving for funding purposes and deleting information that is no longer required to be kept.
- **How long will you keep data? When will you dispose of data?** Certain projects require information to be kept for a specified period of time which could be from 2-6 years for auditing purposes. Projects that have been funded through European funding require that data to be kept for 10 plus years. Each funder has their own requirements for the period of time that data is kept.

## Data Quality

*The measures and processes you will put in place to ensure your data is accurate, complete, and consistent. This may include regularly reviewing and cleaning data, and rules for data entry and validation.*

- **How will you communicate the importance of quality data?** Each project manager is briefed with the aims and objectives and the key performance indicators with outputs and outcomes for the project. This is a starting point for that data to be collated for



the life of the project. The importance of quality data is highlighted at the initial start of the project. The quality of data is checked through monthly and quarterly reports that are produced by the programmes managers and sent to the funding organisations and the IHB board of directors.

- **What rules will you put in place when collecting and storing data?** Data relevant to the project and the development of the organisation is collected on an ongoing basis and securely stored on google drive with limited and restricted access to those that are linked to that data.
- **Will you periodically test the quality of your data?** The quality of the data is checked and tested on an ongoing basis for continuous improvement. This is done at least on a quarterly basis when full reports are produced and the data can be checked for robustness and quality.

Our Data Protection Policy has more details about what measures we have and can put in place to ensure continued quality of the personal data we process.