

| | |
|---|--------------------------------------|
| Safeguarding and Welfare Requirements: Welfare | |
| Policy Name: | Data Protection — GDPR Policy |
| Policy Creation Date: | January 2019 |
| Last review: | January 2022 |
| Next review: | January 2023 |
| Owner: | HR/Operations Director |

This policy applies to all employees of the Charity

Purpose of this Policy

This policy sets out this Charity’s commitment to protecting personal data and how that commitment is implemented in respect of the collection and use of personal data.

The Charity is fully committed to comply with the General Data Protection Regulation (GDPR). GDPR applies to all organisations that process data relating to their employees, as well as to others including clients and contractors. It sets out principles which should be followed by those who process data.

Statement of Principles

In accordance with our core values this policy will comply with the basic principles of ethics, legality, prudence, equality, safety, timeliness, fairness, transparency and simplicity.

To this end, the Charity endorses fully and adheres to the six principles of data protection, as set out in Article 5 of GDPR.

1. Data must be processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Data must be 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.
5. Data must be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. Data must be 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.

These principles must be followed at all times when processing or using personal

information.

Through appropriate management and strict application of criteria and controls, the Charity will:

- observe fully the conditions regarding the fair collection and use of information including the giving of consent
- meet its legal obligations to specify the purposes for which information is used
- collect and process appropriate information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements
- ensure the quality of information used
- ensure that the information is held for no longer than is necessary
- ensure that the rights of people about whom information is held can be fully exercised under the GDPR (ie the right to be informed that processing is being undertaken, to access one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as incorrect)
- take appropriate technical and organisational security measures to safeguard personal information
- publicise and abide by individuals' right to appeal or complain to the supervisory authority (the Information Commissioner's Office (ICO)) in the event that agreement cannot be reached in a dispute regarding data protection
- ensure that personal information is not transferred abroad without suitable safeguards.

Any failure to follow the Data Protection Policy may lead, therefore, to disciplinary proceedings.