

NORTH WEST CHILDRENS
SUPPORT GROUP



DATA PROTECTION POLICY

Approved - June 2018

Reviewed January 2019

Review Date June 2019

POLICY STATEMENT

The North West Children's Support Group recognises that it has a responsibility to:

- Comply with the law in respect of the data it holds about individuals;
- Follow good practice;
- Protect NWCSG's supporters, volunteers and other individuals
- Protect the organisation from the consequences of a breach of its responsibilities.

This policy is written in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR)

The data covered by this policy is the data submitted to the charity and used by it in order for the charity to undertake its charitable work. It does not include data which individuals may supply to social networking sites that are for social rather than charitable objects.

POLICY AIMS

- To comply with both the law and good practice
- To respect individuals' rights
- To be open and honest with individuals whose data is held
- To provide training and support for volunteers who handle personal data, so that they can act confidently and consistently

KEY RISKS

NWCSG has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately) — especially at volunteer level.
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Lack of efficient systems of managing changes to volunteers' data, leading to personal data not being up to date.
- Harm to individuals if personal data is not up to date

CONFIDENTIALITY

Confidentiality applies to a much wider range of information than Data Protection. It must be made clear that confidentiality and data protection are different things. Some of the things that are likely to be confidential, but may well not be subject to Data Protection, include:

- Information about the organisation (and its plans or finances, for example)
- Information which is not recorded, either on paper or electronically
- Information held on paper, but in a sufficiently unstructured way that it does not meet the definition of a “relevant filing system” in the Data Protection Act

Normally access to data about service users and volunteers will be defined on a “need to know” basis; no one should have access to information unless it is relevant to their work.

There are limits to confidentiality. There may be cases where the NWCSG feels it is right and legal to break confidentiality, to protect the wellbeing of the service users or volunteers.

DATA RECORDING AND STORAGE

NWCSG is moving towards a single database holding basic information about all supporters and volunteers. However, the nature of the charity means some information will be held in paper formats only and information will still be gathered in a paper format in many cases. NWCSG will regularly review its procedures for ensuring that its records remain accurate and consistent. Data on any individual will be held in as few places as necessary. All data held on pen drives, laptops or PCs will be password protected. All data which is shared electronically will be password protected.

NWCSG has established retention periods for the following categories of data:

- Service Users: Medical forms, Accident/Incident forms. Safeguarding Alert forms
- Volunteers: Application/Registration forms, References, Accident/Incident forms, Safeguarding Alert forms

Data which is gathered electronically will be stored at Box.com, a cloud based secure storage system.

Data which is gathered in a paper format will be scanned and stored at Box.com. The paper copy will subsequently be securely destroyed.

Existing paper documents will be stored in locked filing cabinets within the NWCSG secure storage facility.

SUBJECT ACCESS REQUESTS

NWCSG understands that Service Users and Volunteers have the right to access their personal data.

Subject access requests can be made verbally or in writing to any part of our organisation (including by social media). Requests do not have to be to a specific person or contact point. A request does not have to include the phrase 'subject access request' or Article 15 of the GDPR, as long as it is clear that the individual is asking for their own personal data.

This presents a challenge as any of our volunteers could receive a valid request. We will provide training for our volunteers to help them to identify a subject access request.

We will respond to subject access requests within one month.

We will not charge a fee to deal with a request.

TRANSPARENCY

NWCSG is committed to ensuring that Data Subjects are aware that their data is being processed and for what purpose it is being processed, Data Subjects will generally be informed in the following ways:

- Service users: A Privacy Notice will be given with the referral form, in the welcome visit or with the holiday medical form
- Volunteers: A Privacy Notice will be included in the volunteer support pack

Consent for the use of this information is implicit in the terms of agreeing to volunteer or to use the services of the charity. However volunteers and service users will be asked to provide written consent for the use of their data as described in the Privacy Notice.

The NWCSG acknowledges that, once given, consent can be withdrawn, but not retrospectively. As an organisation, we have no choice but to retain certain data for the length of time required by our insurers.

Data collected is only for the use of the NWCSG and to allow it to fulfil its charitable objects.

Appendix 1: Your Data Your Rights – NWCSG (Privacy Notice for Service Users)

Appendix 2: Your Data, Your Rights – NWCSG Volunteers (Privacy Notice for Volunteers)

