



Data Protection and Data Security Policy

1 Policy statement

Friends and Places Together –FandPT–looks after the information it holds about you, and respects your privacy. We take precautions to prevent your information being lost or falling into the wrong hands.

We make sure that the information we hold is as accurate as possible; we do not hold more information than we need; and we do not hold it longer than we need to.

We do not share your data with anyone else without your permission, except when we believe it is the only way to prevent harm to you or other people. If we do disclose information without your permission, this is authorised by a senior member of staff, and we will explain our reason to you at the earliest opportunity.

2 Introduction and general principles

FandPT is committed to good practice in the handling of personal data and careful compliance with the requirements of the Data Protection Act.

The most important risks which this policy addresses are:

- Inappropriate disclosure of personal data about service users that puts an individual at personal risk or contravenes a duty of confidentiality.
- Negligent loss of data that would cause concern to people whose data was lost and would seriously affect FandPT reputation.

Operational procedures and guidance to paid staff and volunteers set out more detailed ways in which these risks can be managed and the objectives achieved.

All staff and volunteers who may handle personal data are given induction appropriate to their role and training in the systems and policies of FandPT, including periodic refresher training and reminders.

Background information on the Data Protection Act can be found at the end of this policy.

3 Responsibilities

The Board of Trustees of FandPT recognises its overall legal responsibility for Data Protection compliance.

Day to day responsibility for Data Protection is delegated to the Chief Officer as the nominated Data Protection Officer. The main responsibilities of the Data Protection Officer are:

- Briefing the board on their and FandPT Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and regular training takes place

Friends and Places Together / Break With Mates

20 Crowstone Road, Westcliff-on-Sea, SS0 8BA

Website: www.friendsandplaces.org.uk www.breakwithmates.org.uk

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- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors (external contractors and suppliers of outsourced services)
- Notification (i.e. registration with the Information Commissioner)
- Handling requests from individuals for access to their personal data

All staff and volunteers are responsible for understanding and complying with the procedures that FandPT has adopted in order to ensure Data Protection compliance.

FandPT is not responsible for the activities of regional alumni branches, but provides them with details of alumni in their region along with guidance on the branch's Data Protection responsibilities.

4 Data collection

FandPT gathers data about people that use their service.

- Upon acceptance of using the services offered
- Periodically after any event may follow up and to ensure our records are accurate

When collecting data, FandPT will ensure that people that use the service:

- Clearly understand why the information is needed, what it will be used for and which other organisations or individuals it may routinely be disclosed to.
- Are given a clear opportunity to opt out of processing for secondary purposes (such as publicity) or disclosure to other organisations (such as alumni branches) where this would not jeopardise delivery of the service.

In order to achieve this all data collection forms – electronic or paper-based – use an agreed standard wording (adapted as necessary for each programme), to ensure that all Data Subjects are given consistent information and consistent choices.

5 Confidentiality & security

FandPT recognises that a clear policy on confidentiality of personal data – in particular that of staff, volunteers and members– underpins security. It maintains a policy that sets out which staff and volunteers are authorised to access which data and for which purposes. In particular this clarifies when data may be disclosed outside FandPT and whether such disclosures require the individual's consent.

FandPT maintains a security policy that sets out measures to protect data 'at rest' – including access being restricted only to authorised staff and volunteers – and measures to protect data 'in transit', whether it is physically removed from a secure environment or transmitted electronically.

All staff and volunteers are required to abide by any security measures designed to protect personal data from loss, misuse or inappropriate disclosure.

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6 Data management

All data collection and recording systems are designed to ensure that the data collected is adequate, relevant and not excessive for the purpose. Where relevant, staff and volunteers are given training in good data recording practice to ensure that the data they record is appropriate.

FandPT takes reasonable steps ensure that information is kept accurate and up to date by asking data subjects at appropriate intervals to check their key information for accuracy and to notify Shared Lives Plus if there have been any changes.

FandPT maintains an agreed retention schedule based on legal and practical requirements.

7 Specific legal provisions

FandPT makes a standard charge of £10 for Subject Access, which may be waived at the discretion of the Data Protection Officer.

FandPT maintains an up to date Notification with the Information Commissioner as required by law.

All contracts between FandPT and external data processors are reviewed by the Data Protection Officer for compliance with Data Protection Act requirements.

8 Policy review

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

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Appendix: Data Protection Act background

Scope of the data covered by this policy

The Data Protection Act covers “personal data.” This is information about identifiable living individuals. It does not apply to information about organisations, companies or agencies but applies to named persons such as programme participants, volunteers or employees. This policy also covers personal information held by Shared Lives Plus that for technical reasons may not fall within the definition of personal data.

Data Controller

FandPT is known as the “Data Controller” under the terms of the Act because it decides why and how personal data is processed. As an organisation FandPT is responsible for compliance with the Data Protection Act, and in particular the eight Data Protection Principles.

Data Protection Principles

Compliance with the Principles is a legal requirement. The Principles, in brief, say that personal data shall be:

- processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes;
- adequate, relevant and not excessive in relation to those purpose(s);
- accurate and, where necessary, kept up to date;
- not kept for longer than is necessary;
- processed in accordance with the rights of data subjects under the Act;
- kept secure through appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal data;
- not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals in relation to the processing of personal information.

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We hereby confirm and agree the Policy

Signed:
Denise Nygate CEO

Dated:

Signed: Dated:
Neil Woodbridge Trustee