



Bishops Stortford Youth Project
(Thirst Youth Café)

Data Protection Policy

Section 1: Introduction

This policy applies to all children, young people, parents/carers (known as clients) employees and volunteers of Bishop's Stortford Youth Project.

The purpose of this policy is to enable Bishop's Stortford Youth Project to:

- Comply with the law in respect of the data it holds about individuals;
- Follow good practice;
- Protect children, young people, parents/carers, employees, volunteers and other individuals
- Protect Bishop's Stortford Youth Project from the consequences of a breach of its responsibilities.

The Data Protection Act 1998

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

The Act works in two ways. Firstly, it states that anyone who processes personal information must comply with eight principles, which make sure that personal information is:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with the rights of Data Subjects
- Secure
- Not transferred to other countries without adequate protection

The second area covered by the Act provides individuals with important rights, including the right to find out what personal information is held on computer and most paper records.

Section 2: Policy Statement

Bishop's Stortford Youth Project will:

- Comply with both the law and good practice
- Respect individuals' rights
- Be open and honest with individuals whose data is held
- Provide training and support for employees and volunteers who handle personal data, so that they can act confidently and consistently

Bishop's Stortford Youth Project recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. Information about employees, volunteers and clients will be used fairly, securely and not disclosed to any person unlawfully.

Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, Bishop's Stortford Youth Project will seek to give individuals as much choice as is possible and reasonable oversight of data is held and how it is used.

All processing of personal data will be undertaken in accordance with the data protection principles.

Section 3: Definitions

The Data Subject is the individual whose personal data is being processed. Examples include:

- Employees – current and past
- Volunteers
- Job applicants
- Donors
- Service users
- Suppliers.

Processing means the use made of personal data including:

- Obtaining and retrieving
- Holding and storing
- Making available within or outside the organisation
- Printing, sorting, matching, comparing, destroying.

The Data Controller is the legal 'person', or organisation, that decides why and how personal data is to be processed. The data controller is responsible for complying with the Data Protection Act.

The Data Protection Officer is the name given to the person in organisations who is the central point of contact for all data compliance issues.

Section 4: Responsibilities

The Board of Trustees recognises its overall responsibility for ensuring that Bishop's Stortford Youth Project complies with its legal obligations. Data will be reviewed quarterly and deleted as appropriate.

Each employee and volunteer at Bishop's Stortford Youth Project who handles personal data will comply with the organisation's operational procedures for handling personal data (including induction and training) to ensure that good Data Protection practice is established and followed.

All employees and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under Bishop's Stortford Youth Project disciplinary procedures.

Section 5: Security

This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.

Any recorded information on clients, volunteers and employees will be:

- Kept in locked cabinets
- Protected by the use of passwords if kept on computer
- Destroyed confidentially if it is no longer needed

Access to information on the main organisation database is controlled by a password and only those needing access are given the password. Employees and volunteers

should be careful about information that is displayed on their computer screen and make efforts to ensure that no unauthorised person can view the data when it is on display.

Notes regarding personal data of clients should be shredded or destroyed

Section 6: Data Recording and Storage

Bishop's Stortford Youth Project has spreadsheets holding basic information about employees and volunteers.

Bishop's Stortford Youth Project will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- The database system is reviewed and re-designed, where necessary, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary, and all employees and volunteers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures are in place so that all relevant systems are updated when information about any individual changes.
- Employees and volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
- Data will be corrected if shown to be inaccurate

Bishop's Stortford Youth Project stores archived paper/electronic records of clients, employees and volunteers securely at their registered address.

Section 7: Access to Data

Bishop's Stortford Youth Project have not allocated a Data Protection Officer as personal data is only processed on a small scale and our main activities rarely involve monitoring data subjects. All clients have the right to request access to all information stored about them. Any subject access requests will be handled by a Trustee/Employee within the required time limit (within 30 working days of receiving request).

Subject access requests must be in writing. All employees and volunteers are required to pass on anything which might be a subject access request to the Trustee/Employee without delay.

Where the individual making a subject access request is not personally known to the Trustee/Employee their identity will be verified before handing over any information.

The required information will be provided in easy to use formats e.g. PDF, XLS & CSV.

Bishop's Stortford Youth Project will provide details of information to clients who request it unless the information may cause harm to another person.

Employees have the right to access their file to ensure that information is being used fairly. If information held is inaccurate, the individual must notify a Trustee/Employee so that this can be recorded on file.

Section 8: Transparency

Bishop's Stortford Youth Project is committed to ensuring that in principle Data Subjects are aware that their data is being processed and

- For what purpose it is being processed;
- What types of disclosure are likely; and

- How to exercise their rights in relation to the data.

Section 9: Consent

Consent will normally not be sought for most processing of information about employees, although employees details will only be disclosed for purposes unrelated to their work with Bishop's Stortford Youth Project (e.g. financial references) with their consent.

Information about clients will only be made public with their consent or in case of Safeguarding or a medical emergency. (This includes photographs.)

'Sensitive' data about clients will be held only with the knowledge and consent of the individuals parent/guardian/carer.

Consent should be given in writing, although for some services it is not always practicable to do so. In these cases, verbal consent will always be sought to the storing and processing of data. In all cases it will be documented on the database that consent has been given.

Bishop's Stortford Youth Project acknowledges that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where Bishop's Stortford Youth Project has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.

Section 10: Direct Marketing

Bishop's Stortford Youth Project will treat the following unsolicited direct communication with individuals as marketing:

- Seeking donations and other financial support;
- Promoting any Bishop's Stortford Youth Project services;
- Promoting Bishop's Stortford Youth Project events;
- Promoting the service to client;
- Promoting sponsored events and other fundraising exercises;

Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out which is exercised will apply to all Bishop's Stortford Youth Project marketing. Bishop's Stortford Youth Project does not have a policy of sharing lists, obtaining external lists or carrying out joint or reciprocal mailings.

Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.

Section 11: Employee/ volunteer training and acceptance of responsibilities

All employees/volunteers who have access to any kind of personal data will be given copies of all relevant policies and procedures during their induction process and the operational procedures for handling personal data. All employees will be expected to adhere to all these policies and procedures.

- Data Protection will be included in the induction training for all.

- Pro-Action will provide opportunities for employees/volunteers to explore Data Protection issues through training, team meetings, and supervisions.

Section 12: Client Data Protection

All personal data shall be obtained, maintained, stored, used and shared only in strict accordance with the Data Protection Act 1998.

Information relating to individuals supported by Bishop's Stortford Youth Project through the work of the organisation will be dealt with in the following manner:

- Attendance and attainment records will be de-personalised within 12 months
- All other information, will be kept for no longer than 3 years.
- Information that is of vital importance to the future protection of an individual / (or young people) will be securely archived and stored as long as express agreement is obtained from the data subject (or as felt appropriate).

All personal data must be protected by appropriate security measures to safeguard against unauthorised or unlawful processing of personal data: - (e.g. locked filing cabinet). All employees/volunteers and representatives of Bishop's Stortford Youth Project must:

- Only access and use data that is relevant to and necessary to the performance of their job function.
- Make yourself familiar with Bishop's Stortford Youth Project data protection policy and procedures.

Section 13: Photographs

Bishop's Stortford Youth Project frequently take photographs and videos of children and young people participating in activities and events. At all times written permission from parents/guardians/carers must be obtained before any photographic material is used in the public domain.

It is Bishop's Stortford Youth Project responsibility to ensure that, photographs of children/young people without consent do not get saved to a computer.

Any photographs used for publicity purposes (brochures, leaflets, website etc.) should not be accompanied by any personal information (first names only, avoid school badges). Any photographs of a child/young person should be removed from the website within 5 years of that young person no longer engaging with the organisation. Photographs & videos should not be kept for longer than 5 years.

Section 14: Confidentiality

During the course of your employment/volunteering with Bishop's Stortford Youth Project you may have access to and be entrusted with information in respect of children/young people, plus the business and financing of Bishop's Stortford Youth Project and its affairs, all of which is, or may be confidential.

You shall not (except in the proper course of your duties) during or after the period of your employment/volunteering divulge to any person, or otherwise make use of (and shall use your best endeavours to prevent the publication or disclosure of) any confidential information concerning any children/young people or the business and finances of Bishop's Stortford Youth Project or any such confidential information concerning any of its clients.