



Charity Number: 1146161

Company Number: 07514356

Data Protection Policy

This policy was first adopted on 02.10.2017 and reviewed annually unless circumstances require that it be reviewed before this.

The policy will be evaluated for appropriateness and effectiveness at the same time.

Name: Victoria Williamson

Position: Centre Manager

Date: 02.10.2017

Review Date: 27.04.2018

Aims and Objectives

The objective of the policy is to ensure that Pathways 4 All acts within the requirements of the Data Protection Act 1998 and are prepared for the EU General Data Protection Regulation 2018 when collecting, retaining and storing personal data, and when making it available to individuals. The policy applies to all personal information, no matter how it is collected, used or recorded and covers information held on paper or electronically. The policy provides a set of guidelines to enable staff/volunteers, parents/carers and children/young people to understand:

- The law regarding personal data
- How personal data should be collected, processed, stored, archived and deleted/destroyed
- How staff/volunteers, parents/carers and children/young people can access personal data

Guidance on the Freedom of Information Act, which details access rights to your personal data and other information held by Pathways 4 All, can be found on our website.

Pathways 4 All are registered as Data Controllers with the Information Commissioner's Office (ICO). The registration number is **ZA282323** and the registration details can be found on the ICO Website. As a Data Controller, Pathways 4 All collects personal data about staff/volunteers, parents/carers, children/young people and other individuals who we come into contact with. This information is gathered and used in order to enable the provision of education and other associated functions.

In addition Pathways 4 All may be required, by law, to collect, use and share certain information. All Pathways 4 All staff/volunteers and trustees involved with the collection, use, processing or disclosure of personal data are governed by this policy. They will be aware of their duties and responsibilities and will adhere to this policy.

Data Handling

What Is Personal Information/ Data?

Personal information or data is information which relates to a living individual who can be identified from that data. Personal data includes (but is not limited to) an individual's name, address, date of birth, photograph, bank details and other information that identifies them.

Why Do We Keep Personal Records?

We collect and hold information on children and families to help us decide the best way to provide services to them or to fulfil our legal duties.

For volunteers and staff we will store personal details for the Health and Safety reasons, to communicate effectively with the team and for the purposes of paying wages.

Who Can See the Information Held About You?

Only staff at Pathways 4 All can see your data. This includes office staff dealing with memberships, programmes staff delivering staffed activities, management and safeguarding staff involved in staff and volunteer recruitment and Directors and Trustees who oversee the running of the charity.

How long will we keep personal data?

Once we have finished providing a service we will only keep the information if you are likely to require the same or similar service again, or for statutory reason. We will not hold your data longer than is required.

How do we dispose of data?

All paper based records containing personal data will be destroyed using a micro cut shredder. Computer based data will be deleted from within a database or from a file permanently.

Data Audit

A complete list of all data we collect and store is available detailing how and why we collect and use this information. This is a working document that is updated and reviewed regularly to ensure our practices are lawful and reasonable.

Data Protection Principles

The Data Protection Act 1998 establishes eight principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes
3. Personal data shall be adequate, relevant and not excessive
4. Personal data shall be accurate and where necessary, kept up to date
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection

Your Rights

This applies to staff, children (of an age to understand the information they are requesting) and parents (as defined in the Education Act 1996) requesting access to their personal data.

You may:

- Ask if we hold personal information about you
- Ask what we use it for and to whom we disclose the information
- Request a copy of the information
- Ask for incorrect data to be corrected
- Ask for personal information about you not to be used for direct marketing
- Seek compensation for damage or distress caused if we do not comply with the Act

Within Pathways 4 All the Centre Manager has overall responsibility for personal data. To request access to personal data held about yourself or your child you can contact the Centre Manager by telephone on 0191 2665233 or email vicky4pathways@gmail.com .

You have the right to question and correct inaccurate personal information, but this must refer to matters of fact, not opinions.

Our Commitment

Pathways 4 All is committed to maintaining the above principles at all times. Therefore we will:

1. Inform individuals why personal information is being collected, via our privacy notice and statement on all membership forms and registration forms for staffed activities
2. Inform individuals when their information is shared, and with whom unless the Data Protection Act provides a reason not to do this
3. Check the accuracy of the information held and review it at regular intervals by requesting yearly registration forms for staffed programmes, and making verbal requests at time of yearly renewal for family memberships
4. Ensure that clear and robust safeguards are in place so that personal information is kept securely and protected from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded. For example, computer based databases are password protected, membership files are kept in locked cabinets
5. Ensure that personal information is not retained longer than is needed. Archiving data in a secure manner after two years
6. Ensure that when information is destroyed that it is done so appropriately and securely
7. Share personal information with others only when it is legally appropriate to do so
8. Comply with the duty to respond to requests for access to personal information
9. Ensure that personal information is not transferred outside the EEA without the appropriate safeguards
10. Ensure all staff, volunteers and trustees are aware of, understand and comply with these policies and procedures

Fair Processing And Sharing Of Personal Data

Pathways 4 All hold information about its members, staff and volunteers in order to run the charity and The Tim Lamb Centre, and in doing so has to follow the Data Protection Act 1998. This means that the data held must only be used for specific purposes allowed by law. Pathways 4 All has a Privacy Notice which explains how personal data is used and with whom it will be shared. This notice is displayed in the reception area and is posted on our website. Pathways 4 All uses information to inform funders of the needs of members/users. This information is anonymised so that individual members cannot be identified from them.

How Do We Respond To Requests For Personal Data?

- Guidance on how to respond to requests for information is provided by The Freedom of Information Act, which came into force on 1st January 2005. Under this Act, we are required to respond within 20 days to any written or emailed request for information which we hold or publish.
- Pathways 4 All can only share with a member their own personal data. Pathways 4 All can and will refuse to share personal data with external organisations unless it is lawful to do so (i.e. with Police, Emergency Medical Staff, Social Services). We will always state the reason for refusal.
- Pathways 4 All will keep the original request and note against this who dealt with the request and when the information was provided.

Data Breach

If a Data Breach occurs (accidental disclosures/losses of personal data), this **MUST** be reported to the Centre Manager as soon as the breach has been discovered so that appropriate measures can be taken to recover the data and limit any damage. Pathways 4 All is obliged to report serious breaches to the Information Commissioner's Office (ICO).

Complaints

Any complaint about the provision of information will be handled by the Centre Manager. All complaints should be in writing and documented and will be dealt with in accordance with Pathways 4 All's complaints policy. Complaints can also be made directly to the Information Commissioner if enquirers are unhappy with the way their request has been handled.

Information Commissioner's Office (ICO) Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF ICO Telephone: 0303 123 1113 Website: www.ico.gov.uk

Staff/Volunteer Data Handling Guidelines

Pathways 4 All is committed to Data Protection for all persons accessing the charities' Tim Lamb Centre. The safeguarding of personal data affects you too. Please help keep everyone safe by following these guidelines.

- Membership details must NEVER be shared with anyone other than the member themselves or relevant office staff/management.
- Membership forms MUST be kept in the file in a locked drawer/cupboard.
- Computer based Membership Database MUST be closed after each use and is password protected. DO NOT share this password with anyone other than office staff.
- Children's Registration details must NEVER be shared with anyone other than the parent/carer of the child who has completed the form, staff providing a service to that child. If a concern over a child/vulnerable adult's welfare arises, the Safeguarding procedures are to be followed, keeping the sharing of personal data to a minimum in line with the Safeguarding policy.
- Children's Registration forms MUST be kept in a file in a locked drawer/cupboard.
- Computer based Registration Database MUST be closed after each use and be password protected. DO NOT share this password with anyone other than relevant Programmes Staff and Management Staff.
- Staff/Volunteer Forms must NEVER be shared with anyone other than the staff member/ volunteer themselves, relevant management staff or Board Members. Under no circumstances should any personal data be given out other than a work email address for Pathways 4 All staff without prior consent of the staff member / volunteer.
- Staff/Volunteer Forms MUST be kept in the file in a locked drawer / cupboard.
- Computer based Staff/Volunteer Database MUST be closed after each use and be password protected. DO NOT share this password with anyone other than Management Staff.
- Caravan Bookings Forms must NEVER be shared with anyone other relevant office staff or management staff.
- Caravan Bookings Forms MUST be kept in the file in a locked drawer / cupboard.
- Session records containing personal data must NEVER be shared with anyone other than the programmes staff and management staff.

- Session Records containing personal data MUST be kept in a file in a locked drawer/cupboard.
- Computer based Session Records containing personal data MUST be closed after each use and be password protected. DO NOT share this password with anyone other than the relevant programmes staff and management staff.
- Accident Records / Incident Records containing personal data must NEVER be shared with anyone other than Management Staff.
- Accident Records / Incident Records containing personal data MUST be stored in a file in a locked drawer/cupboard.
- Photographs must be stored securely on the computer, in a password protected file. The use of photographs must follow the guidelines within the Photograph Policy
- Group Emails MUST use the 'BCC' function NOT 'TO' or 'CC' so as not to share any personal data with other persons.
- When taking card payments over the phone DO NOT write down any information, be careful not to repeat all information back to them giving someone else the opportunity to write it down.
- Phone messages containing personal data should only be recorded in the message book and then erased from the answer machine. The message book MUST remain in the office.
- Party bookings containing personal data should only be recorded in the diary. The diary MUST remain in the office.
- Written or computer based documents containing personal data must NEVER be taken from the premises. The only exception is emergency contact details for group sessions offsite that take place outside of the centre opening hours i.e. Just 4 Us. In all other circumstances, in the event of an emergency lead workers should contact the office and office staff should know where to locate the relevant information.
- If a concern over a child/vulnerable adult's welfare arises, the Safeguarding procedures are to be followed, keeping the sharing of personal data to a minimum in line with the Safeguarding policy.
- If there is a medical emergency involving emergency medical staff such as paramedics personal data may be shared to allow the appropriate care to be given. It is lawful to do this HOWEVER please ensure this is recorded and passed onto the Centre Manager immediately.

- If personal data is requested by Fire, Police or Social Services it is lawful to share this information HOWEVER please ensure this is recorded and passed onto the Centre Manager immediately.
- If you have questions about this policy or these guidelines please contact Vicky, Centre Manager on 0191 2665233 or vicky4pathways@gmail.com