



THE PROUT BRIDGE PROJECT

DATA PROTECTION POLICY – January 2022

Reviewed 9th January 2024

Date for review 31st January 2025

Policy

The Prout Bridge Project's Data Protection Policy sets out our commitment to protecting personal data and how our staff and volunteers will implement that commitment ensuring we comply with the law in respect of the collection and use of personal data. The General Data Protection Regulations (GDPR) regulates the processing of information that relates to living and identifiable individuals, who are known as data subjects.

GDPR have eight underlying principles of good practice, that state personal data must be:

1. Obtained and processed fairly and lawfully.
2. Only be collected and used for specific purposes.
3. Adequate, relevant and not excessive.
4. Accurate and kept up to date.
5. Not be kept for longer than is necessary.
6. Data subjects rights must be respected.
7. Kept safe from unauthorised access, accidental loss or damage.
8. Not transferred to countries without adequate data protection.

All personal data will be held in accordance with the principles and requirements of GDPR and other relevant legislation, and procedures will be put in place to ensure fair processing of data subjects. Any and all staff, volunteers or members of management committee/Board of Trustees who process or use personal data must ensure they abide by these principles at all times.

The Prout Bridge Project is the data controller under the Regulations and is therefore ultimately responsible for the implementation. Day-to-day matters, notification, contact with the Information Commissioner, ensuring this policy and compliance is reviewed at appropriate intervals and the handling of subject access requests will be dealt with by the Data Protection Officer: C/O 6 Prout Bridge, Beaminster, Dorset DT8 3AY

Relevant data protection issues will be included in all induction and training.

Information held by the Prout Bridge Project

Information held by the Prout Bridge Project relates to the young people we support, other organisations (including those in the public and private sectors) and individuals (including volunteers, employees, Management Committee/Board of Trustee members, trainers – current, past and potential) who support, assist, provide services to, work within or alongside, fund the work we do or who we provide services to.

The Prout Bridge Project will ensure that individuals know how information held about them is used or disclosed. Information held about individuals will only be collected and recorded where there is good reason to do so. It will be stored securely as per the data protection and confidentiality policies and only for as long as is required.

Relevant data protection issues will be included in all induction of new staff and internal audits of data protection compliance will be carried out at appropriate intervals. At least one member of staff will attend data protection training and will disseminate learning to all members of staff to have a general awareness of what is required.

Information about individuals will not be published in any type of directory without the written consent of the individual.

The Prout Bridge Project will not give out information about any individual over the telephone or by e-mail unless it is satisfied that the individual has given written consent, or the information is already in the public domain. The only other exception to this is that there is a legal, over-riding reason for the information sharing – such as safeguarding. For more details about how this information will be shared, please see the Information Sharing section in our Confidentiality policy.

Information about individuals will not be passed to other organisations for marketing, fundraising or circulating information unless the individual has been informed that this might happen and been given the opportunity to opt-in or opt-out as appropriate.

The website for the Prout Bridge Project will not contain any personal data unless it is necessary. Where information is captured on the website, a clear policy statement will be provided, and no personal data will be captured without the knowledge of the data subject.

Photographs, recordings, videos or DVDs in which individuals are identifiable will only be used with their explicit written consent captured on club consent form or media consent form.

Information no longer required will be disposed of appropriately including ensuring that data is non-recoverable from any computer system. All data will be held in accordance with our stated Retention Period.

Consent

Members will be asked to provide personal details on joining the club and will be required to opt in or out of giving consent for holding details. The Prout Bridge Project will detail on the consent form how data is stored and give an option for each method of storage. A members' personal data will not be passed onto anyone outside of the club's staff, volunteers or management committee without consent from the member, unless there is a legal duty to share this information with regards to the safeguarding of our members. Members also have the right to be forgotten and can request that their data be removed from our records.

Personnel records

The names and post held of staff or volunteers within the Prout Bridge Project are considered to be in the public domain and may be made freely available in any format to anyone.

The names, organisation and role held of Management Committee/Board of Trustee members within the Prout Bridge Project – and people seeking election or nomination as Management Committee members – are considered to be in the public domain and may be made freely in any format to anyone.

The address, telephone number and email address of Management Committee/Board of Trustees members shall be made available to staff and Management Committee/Board of Trustee members only. This information will only be provided for the purpose of making contact to further the work of the Prout Bridge Project.

The Prout Bridge Project **provide** work mobiles. Home and personal mobile numbers of staff are confidential but shall be made available to other staff members for the purpose of making contact in an emergency or urgent work-related matter.

If the Prout Bridge Project **has not provided** work mobiles. Your personal mobile may be in the public domain in the community of Beaminster for the purposes of administration of the club. To protect young people's information, if data is saved in the personal mobile of a staff member or volunteer, it should be done using initials to decrease the chance of identification. Any photos or videos of activities on a personal device should be transferred to club IT as soon as possible (cloud-based storage if no club IT equipment) and deleted from personal IT equipment as soon as this is transferred. In small communities, the risk of an 'everyone knows everyone anyway' mentality is high. The Prout Bridge Project is committed to putting the

protection of any personal data above the fact that some data will already be known within communities.

All material in respect of all applicants to any post (other than the successful applicant) – paid or voluntary – gained during the selection of staff or volunteers is confidential and shall be retained for twelve months after the effective start date of the staff member or volunteer, at which point it shall be destroyed.

All information required for the purposes of payroll is confidential and made available only to the Treasurer of the Management Committee, Chair of the Management Committee and the Manager.

All other information within personnel records is confidential and can only be made available to the Manager and the Chair of the Management Committee. Personnel records are only used for matters connected with the individual's employment at the Prout Bridge Project or to help with references the organisation may write in future at the individual's request.

Information about age, gender, geographical location, ethnicity, sexual orientation, marital status and disability of staff/volunteers/Management Committee/Board of Trustee members is kept for the purposes of monitoring our equal opportunities policy.

Individuals will be given full open access to their complete personnel records without question and without charge.

Data about individuals not already specified

Data about individuals who are within other organisations, providers of training or any other contact made within the context of the work the Prout Bridge Project shall be confined to contact details and information directly relevant to the reason for their connection to the Prout Bridge Project. Other information about organisations may be held provided this is not personal data.

Access

Only staff/volunteers and the management committee will have access to personal data having been made aware of the club's data protection policy and their obligation not to disclose personal data to anyone who is not authorised to have it.

Data Subject Access requests should be made in writing and signed by the individual and addressed to the Data Protection Officer at the Prout Bridge Project. In response to a Data Subject Access request, the Prout Bridge Project aims to disclose as much information as possible within one month, while respecting the right of any third party to maintain confidentiality wherever reasonable.

No request will be refused or a charge made for Data Subject Access requests unless the request is manifestly unfounded or excessive. If a request is refused, the individual will be informed of the reason why and that they have the right to complain to the supervisory authority and to a judicial remedy, within one month.

Accuracy and longevity/retention period

Reasonable steps will be taken to ensure the accuracy of data. Personal data will be stored until a young person reaches an age where they can no longer access the provision. Then their data will be archived and kept for reference for 2 years before being destroyed, unless otherwise stated by a funding organisation.

Personal details about staff, volunteers and members of the Management Committee/Board of Trustees will be held for 1 year after their service at the Prout Bridge Project ends. At this point, it will then be archived and kept for reference for 3 years before being destroyed.

Data about individuals shall be deleted on the request of the individual when the data is no longer used or required for legal, financial or contractual reasons or in accordance with the Retention Period.

Any information relating to safeguarding concerns will be stored until the child is 25 unless the records have been maintained for the purposes of research, the information is relevant to legal action that has been started but not finished or if the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation) in line with NSPCC guidelines <https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-september-2019.pdf>

If the safeguarding concerns relate to an adult's behaviour around children, these records will be kept until the person reaches the age of 65 or for 10 years – whichever is longer, in line with Information and Records Management Society (2016). For example, if someone is 60 when the investigation into the allegation is concluded, we will keep records until their 70th birthday. If someone is 30 when the investigation into the allegation is concluded, we will keep records until they are aged 65. If allegations are unfounded, records will be kept for the same period of time. If we discover that allegations are malicious any records will be destroyed immediately. This procedure will be followed if the person stops working or volunteering for the organisation.

Some records are subject to statutory requirements and have a specific retention period. This includes records relating to:

- Children who have been 'looked after' by the local authority
- Adopted children
- Registered foster carers

- Residential children's homes

When files are kept for longer than the periods stated here, files will be clearly marked with the reasons for the extension period.

Storage

- Data stored electronically will be held on a password-protected computer system. The email account should also then be signed out of after every use, without storing the password in your browser or anywhere else on the laptop. The IT equipment itself must also be password protected. In the event of staff or volunteers leaving, the Manager will arrange a proper handover to ensure that the club has all appropriate records.
- If paper-based, stored in organised and secure system, in a locked office in the Prout Bridge Project building at 6 Prout Bridge, Beaminster, Dorset DT8 3AY
- Data will not leave the building. If absolutely necessary for business purposes that data leaves the building, copies will be taken of original documents, held securely off site and securely destroyed when no longer needed for the purpose they were taken. Data copies will be stored securely once off the premises and only used for the purpose they were taken. Data copies can only be taken when member of staff has authority from the Data Protection Officer who will make a record of the request – including the following information: nature of data/by whom/what purpose/what off-site storage arrangement will be taken/how long for/how destroyed (see off-site data storage arrangement template).

Reviewed date: January 2024