

NORTH WEST CHILDRENS
SUPPORT GROUP



DATA PROTECTION POLICY

Approved - June 2018

Reviewed January 2019, February 2023

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 securely until they can be uploaded to Box.com.

SUBJECT ACCESS REQUESTS

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

Requests to access personal data (Subject Access Requests) should be emailed to info@nwcsq.co.uk.

We will provide training for our volunteers to help them to identify a subject access request. Volunteers will be advised to direct people making such requests to the Holiday Leaders.

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 may be asked to provide additional 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)

Appendix 1

Your Data Your Rights – NWCSG

Details of the data that NWCSG will record about you and what they will do with it.

Details of the information that we will record about you.

We will record basic information about you including; name, date of birth, address, religion and health information. We will record copies of the medical form; referral form and any information received as part of the referral process.

The data is recorded to ensure we have all the information needed to provide a safe and enjoyable experience when on holiday/trip with NWCSG. We may also use the information recorded to report to people who fund the charity and its work.

The information stored may also take the form of photos and video clips recorded while on holiday or trips with NWCSG.

What is the source of the data that we record about you?

The data recorded is received from numerous places including referrers; written and verbal information from external agencies; parents; volunteers attending the trips and holiday, and may include observations from the general public.

Who do we share your data with and why

NWCSG will only share information when necessary and with the necessary consent from you.

Information is shared with the volunteers on the holiday and some NWCSG committee members. The information will also be shared if we believe you or someone else is at risk (safeguarding).

If we want to share your data with anyone who is not included in this list we will usually inform you and, unless we have the legal grounds to share the data, we will seek your consent.

The information is shared to ensure we provide a safe and enjoyable experience while with the NWCSG.

Subject Access Requests

You are entitled to receive a copy of the data that NWCSG holds about you. There is no charge for this. If you wish to do so please email your request to info@nwcsq.co.uk.

What will happen to your data when you no longer attend holidays or trips with NWCSG?

Following the trips and holidays NWCSG will retain the information securely in line with rules set out by our insurance provider. It will then be deleted or securely destroyed.

Who to contact

If you would like more information about how your data is handled or to receive a copy of your data, please contact info@nwcsq.co.uk.

Appendix 2

Your Data, Your Rights – NWCSG Volunteers

Details of the information that NWCSG will record about its volunteers.

We will record basic information about you including name, date of birth, address and email address. We will also keep copies of the helper application/registration form and all information received as part of the application process including references and DBS results.

The data is recorded to ensure that we have all the information needed to provide safe and enjoyable holidays/outings.

The information stored may also take the form of photos and video clips recorded while on holidays or trips out with NWCSG.

We may use the information recorded to report to people who fund the charity and its work.

What is the source of the data that we record about you?

The data recorded is information which you provide on your application/registration form, information received from your referees and information provided by the DBS.

Who do we share your data with and why?

NWCSG will only share information when necessary and only with the necessary consent from you.

Information is shared with the holiday leaders and some NWCSG committee members. The information may also be shared in an emergency or if we believe that you or someone else is at risk.

If we want to share the data with anyone else we will inform you and we will seek your consent unless we have the legal grounds to share the data.

The information is shared to ensure that we provide safe and enjoyable experiences for all involved with NWCSG.

Subject Access Requests

You are entitled to receive a copy of the data which NWCSG holds about you. There is no charge for this. If you wish to do so please email your request to info@nwcsq.co.uk.

What will happen to your data when you no longer attend holidays or outings with NWCSG?

Following our holidays and outings your data will be retained securely in line with the requirements of our insurance provider. It will subsequently be deleted or securely destroyed.