



DATA PROTECTION POLICY

General Data Protection Regulation (GDPR) 28th May 2018

1 Introduction

For definitions of terms, as set out in the Data Protection Act, see Appendix 1 below.

1.1 Purpose of the Data Protection Policy

All staff who process personal data must comply with the Data Protection Act. Section 4(4) of the Act states that:

‘it shall be the duty of the data controller to comply with the data protection principles in relation to all personal data with respect to which he/she is the data controller’.

The purpose of the Data Protection Policy is to ensure that THE BRIDGE and THE BRIDGE staff comply with the requirements of the Act when processing personal data.

It is important to recognise that infringement of the Data Protection Act 1998 by staff may expose THE BRIDGE and the individual to legal action and claims for substantial damages. Any infringement of the Act will be treated seriously by THE BRIDGE and may be considered under disciplinary procedures.

2 The Data Protection Act

2.1 The Data Protection Act 1998 requires THE BRIDGE to notify the Information Commissioner of the purposes for which ‘personal data’ are ‘processed’ by THE BRIDGE. THE BRIDGE is required to adhere to the eight principles of data protection as laid down by the Act and to permit individuals to access their own personal data held by THE BRIDGE (via a Subject Access Request) in accordance with the terms of the Act.

2.2 Data Protection Principles

In accordance with the Principles laid down by the Data Protection Act 1998, all Personal Data held by THE BRIDGE shall be:

- .1 fairly and lawfully processed,
- .2 processed for specified purposes,
- .3 adequate, relevant and not excessive,
- .4 accurate,
- .5 not kept longer than necessary,

- .6 processed in accordance with the data subjects' rights,
- .7 secure,
- .8 not transferred to countries outside the European Economic Area without adequate protection.

2.3 **General Data Protection Regulation (Revised 28th May 2018)**

The General Data Protection Regulation (GDPR) requires greater accountability and transparency from THE BRIDGE about their collection, processing and storing of personal information.

- i) To help perform the GDPR a Data Protection Impact Assessment (DPIA) has been carried out.
- ii) All current Services Users, Staff, Volunteers, Trustees and Organisations (for ease we will call them 'USERS') THE BRIDGE holds information about will have audited consent from each USER of how to use any information held on digital or hard copy format to comply to the GDPR regulation.
- iii) All new USERS will have their consent information recorded on contact.
- iv) Regular checks will be performed every 12 months to keep details up-to-date. A director or trustee must be elected to oversee this compliance.

3 Responsibilities and Compliance

- 3.1 THE BRIDGE as a body corporate is the data controller. The senior officer responsible for THE BRIDGE compliance with the Data Protection Act is the Chairperson.
- 3.2 The Chairperson shall nominate a Data Protection Officer to be responsible for advising on compliance with the Act, for day-to-day data protection matters and for developing specific guidance notes on data protection issues for members of THE BRIDGE.
- 3.3 Within THE BRIDGE responsibility for proper handling of all personal data shall lie with the Chairperson who shall nominate an individual staff member to act as a Data Protection Co-ordinator for THE BRIDGE.
- 3.4 THE BRIDGE shall take such steps as appropriate to ensure that data subjects are aware of both their rights and obligations THE BRIDGE rights and obligations under the Act, and to make all staff aware of the Act and the implications of processing personal data.
- 3.5 All complaints in connection with the data protection policy shall be made to the Director of Corporate Services in the first instance.
- 3.6 Hard copies of documents containing personal information will be disposed of by cross-cut shredder.
- 3.7 Electronic data is held on a password restricted system.

- 3.8 The password to the computer is changed monthly.
- 3.9 Hard copies of personal data are kept in locked filing cabinets.
- 4.0 The office is secured at night and weekends.
- 4.1 Personal data will be kept for 5 years after an individual ceases to attend The Bridge.
- 4.2 Any information will not be handed over to any other agency without consent of the individual member, unless the information required relates to safeguarding issues.
- 4.3 Backup of all data will be kept to Dropbox.

APPENDIX I

Definitions

The Act refers to a number of defined terms including the following:

Personal Data - Data relating to a living individual who can be identified from that information or from that data and other information in possession of the data controller.

It includes, but is not limited to, name, address, telephone number, id number. It also includes expression of opinion about the individual, and of the intentions of the data controller in respect of that individual. It should be noted that personal data covered by the Act can be held in any format, electronic (including web-sites and emails), paper-based, photographic etc. from which the individual's information can be readily extracted.

Sensitive Data - Relates to racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, actual and alleged offences. Sensitive data are subject to much stricter conditions of processing.

Data Controller - Any person (or organisation, in this case THE BRIDGE who makes decisions with regard to particular personal data, including decisions regarding the purposes for which personal data are processed and the way in which the personal data are processed.

Data Subject - Any living individual who is the subject of personal data held by an organisation.

Processing - Any operation related to organisation, retrieval, disclosure and deletion of data and includes obtaining and recording data, accessing, altering, and adding to, merging, deleting data retrieval, consultation or use of data disclosure or otherwise making available of data.