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Data Protection Policy

This policy applies to all employees, self-employed staff, clients, children & young people, parents/carers and volunteers of The Sadie Centre.

Introduction

The purpose of this policy is to enable The Sadie Centre to:

- Comply with the law in respect of the data it holds about individuals
- Follow good practice
- Protect employees, self-employed staff, clients, children & young people, parents/carers, volunteers and other individuals
- Protect The Sadie Centre from the consequences of a breach of its responsibilities

The Data Protection Act (DPA 2018)

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.

Policy Statement

The Sadie Centre will:

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

The Sadie Centre 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, The Sadie Centre will



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seek to give individuals as much choice as is possible and reasonable oversight of data is held and how it is used.

The Sadie Centre is the Data Controller and if required, is registered under the Data Protection Act 2018. All processing of personal data will be undertaken in accordance with the data protection principles.

Definitions

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

- Employees – current and past
- Self Employed – current and past
- Volunteers
- Job applicants
- 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, and 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 Privacy Officer (Centre Director) is the name given to the person in organisations who is the central point of contact for all data compliance issues.

Responsibilities

The Board of Trustees/Management team recognises its overall responsibility for ensuring that The Sadie Centre complies with its legal obligations.

The Privacy Officer (Centre Director) is currently Roberta Meldrum/Jenny Flynn who has the following responsibilities:

- Briefing the board/committee on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other employees/volunteers on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Electronic security
- Approving data protection-related statements on publicity materials and letters



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Each employee and volunteer at The Sadie Centre 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 The Sadie Centre disciplinary procedures.

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/server 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.

Data Recording and Storage

The Sadie Centre has databases/spreadsheets holding basic information about clients, employees and volunteers. This is backed-up by Courtland Services Partnership Limited (our IT Services provider).

The Sadie Centre 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

The Sadie Centre stores archived paper/electronic records of clients, employees and volunteers securely in lockable rooms.



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Access to Data

All clients have the right to request access to all information stored about them. Any subject access requests will be handled by the Privacy Officer (Centre Director) within the required time limit (within 30 working days of receiving the 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 Privacy Officer (Centre Director) without delay.

Where the individual making a subject access request is not personally known to the Privacy Officer (Centre Director), 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.

The Sadie Centre 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 the Privacy Officer (Centre Director) so that this can be recorded on file.

Transparency

The Sadie Centre 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
- How to exercise their rights in relation to the data

Consent

Consent will normally not be sought for most processing of information about clients and employees, although employees' details will only be disclosed for purposes unrelated to their work with The Sadie Centre (e.g. financial references) with their consent.

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

'Sensitive' data about children/young people will be held only with the knowledge and consent of the individual's 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.

The Sadie Centre acknowledges that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where The Sadie Centre has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.



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Direct Marketing

The Sadie Centre will treat the following unsolicited direct communication with individuals as marketing:

- Seeking donations and other financial support
- Promoting via our Constant Contact newsletters
- 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 Constant Contact marketing. Constant Contact 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.

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 is available when necessary for employees/volunteers to explore Data Protection issues. The Centre is a registered organisation with the Information Commissioner's Office which can also offer guidance as and when required.

Client Data Protection

All personal data shall be obtained, maintained, stored, used and shared only in strict accordance with the Data Protection Act 2018.

Information relating to individuals supported by The Sadie Centre through the work of the organisation will be dealt with in the following manner:

- Tutors are expected to destroy attendance records within 12 months of the course taking place
- All other information will be kept securely for no longer than needed
- Information that is of vital importance to the future protection of an individual or a child/young person 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 The Sadie Centre must:



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- Only access and use data that is relevant to and necessary to the performance of their job function
- Make yourself familiar with The Sadie Centre data protection policy and procedures

Confidentiality

During the course of your employment/volunteering with The Sadie Centre you may have access to and be entrusted with information in respect of children/young people, plus the business and financing of the centre 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 the centre, or any such confidential information concerning any of its clients.