

Helping Hands (HH) Data Protection Policy - April 2020

Aim of Policy

HH needs to keep certain information about its volunteers and residents to carry out its day-to-day operations, to meet its objectives and to comply with legal obligations.

HH is committed to ensuring any personal information will be dealt with in line with the principles in the General Data Protection Regulations 2018 (GDPR). To comply, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully. HH will only collect, store and use the minimum amount of personal information needed for its operations

The aim of this policy is to ensure that everyone handling personal information is fully aware of the requirements and acts in accordance with data protection principles. This document also highlights key data protection procedures within HH.

Responsibility for data protection within HH lies with the Committee and in particular its Data Protection Officer

All Volunteers are responsible for observing this policy and any related procedures in all areas of their work for HH.

Key requirements

In line with the GDPR 2018 principles, HH will ensure that personal information will:

- be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- be obtained for a specific and lawful purpose
- be adequate, relevant but not excessive
- be accurate and kept up to date
- not be held longer than necessary
- be processed in accordance with the rights of data subjects
- be subject to appropriate security measures

The definition of 'processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal information. This includes some paper based personal information as well as that kept on computer.

There are five key principles of good data governance on which best practice is based. HH will seek to abide by these principles in relation to all the personal information it processes, i.e.

- **Accountability:** those handling personal information follow published data principles to help maintain public trust and safeguard personal information.
- **Visibility:** Data subjects should have access to the information that HH holds about themselves. This includes the right to have incorrect personal information corrected and to know who has had access to this information.
- **Consent:** The collection and use of personal information must be fair and lawful and in accordance with the GDPR's seven data protection principles. personal information should only be used for the purposes agreed by the data subject. If personal information is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.

- **Access:** Everyone should have the right to know the roles and groups of people within HH who have access to their personal information and who has used this information.
- **Stewardship:** Those collecting personal information have a duty of care to protect this information throughout its life span

Type of information processed

HH processes the following personal information: contact details of volunteers and villagers; volunteers' driving licence and car insurance details, personal information about villagers, e.g. mobility issues

Personal information is kept in the following forms: paper-based; excel database

Groups of people within the organisation who will process personal information are: Chairs, Secretaries, Phone Holders and IT Adviser

Policy Implementation

To meet our responsibilities Committee Members will:

- ensure any personal information from digital, written or phone sources is collected in a fair and lawful way is
- explain why it is needed;
- ensure that only the minimum amount of information needed is collected and used;
- ensure the information used is up to date and accurate;
- review the length of time information is held on a regular basis;
- ensure it is kept safely;
- ensure the rights people have in relation to their personal information can be exercised, including the right to have their personal information deleted.

HH Committee will ensure that:

- everyone managing and handling personal information is trained to do so.
- anyone wanting to make enquiries about handling personal information, whether a volunteer or service user, knows what to do;
- any disclosure of personal information will be in line with HH's procedures.
- queries about handling personal information will be dealt with swiftly and politely.

Training

Awareness raising about GDPR and how they are to be observed within HH will take the following forms:

- as an agenda item for HH Committee meetings
- in the HH Handbook
- at Volunteer meetings
- by the Policy being available on the HH website

Gathering and checking information

Before personal information is collected, HH will consider:

- what details are necessary for HH's purposes
- how long this information is likely to be needed.

HH will inform people whose information is gathered about the following:

- why the information is being gathered
- what the information will be used for
- who will have access to their information (including third parties).

HH will take the following measures to ensure that personal information kept is accurate:

- HH will send out reminders to people asking them to check their details.
- If no response, HH will judge the consequences of not keeping this information and act upon such judgement.

Personal sensitive information will not be used apart from the specific purpose for which permission was given.

Retention periods

HH will ensure that information is kept according to the following retention period guidelines

- after a Volunteer retires, 12 months
- after a Villager moves away or dies, 12 months

Data Security

The organisation will take steps to ensure that personal information is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures are taken:

- use of lockable cupboards with restricted access to keys.
- password protection on personal information files
- setting up computer system to allow restricted access to certain areas
- backing up database on to a server/the cloud off site
- deletion of Phone Holder's database after each time the Phone Holder ceases being on duty.

Any unauthorised disclosure of personal information to a third party by a Volunteer may result in the termination of the volunteering agreement.

The Committee are collectively accountable for compliance of this policy. A Committee Member could be personally liable for any penalty arising from a breach that they have made.

Procedure in case of a breach

When a breach of data protection occurs, consideration will be given to reviewing practices. If the breach is made by a Volunteer, consideration will be given to asking that Volunteer to step down from HH. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours and to the individual concerned.

Subject Access Requests

Anyone whose personal information HH processes has the right to know:

- what information HH holds and processes about them
- how to gain access to this information
- how to keep it up to date
- what HH are doing to comply with the Act.

They also have the right to prevent processing of their personal information in some circumstances and the right to have corrected, rectified, blocked or deleted information regarded as wrong.

Individuals have a right to access certain personal information being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Data Protection Officer.

The following information will be required before access is granted:

- full name and contact details of the person making the request
- their relationship to HH.

HH may also require proof of identity before access is granted. The following forms of ID will be required: passport or birth certificate.

Queries or complaints about handling personal information will be dealt with swiftly and politely. HH will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required from receiving the written request. HH will endeavour to respond to a complaint within 10 working days.

Review

This policy will be reviewed at intervals of at least 2 years to ensure it remains up to date and compliant with the law.