

DATA PROTECTION

INTRODUCTION

Delamere Forest School Ltd needs to keep certain personal information on its trustees, supporters, associates and service users to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The Charity is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998 and the 2018 General Data Protection Regulation. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

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

This policy covers trustees who work for the Charity and also very occasional volunteers who from time to time may assist with specific limited activities. The Charity does not employ staff.

In line with the Data Protection Act 1998 principles, the Charity will ensure that personal data 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
- Not be transferred outside the European Economic Area (EEA)

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

TYPE OF INFORMATION PROCESSED

The Charity does not, in practice, hold or process large volumes of personal data, but it does currently process the following personal identifying information:

names, home addresses, email addresses and telephone numbers. Primarily this data is used for contacting potential donors. For the purposes of recruitment and registration of Trustees and Volunteers only, their dates of birth and curriculum vitae are also processed in addition.

Personal information is kept as digital files and hard copy.

In most cases, only the Administration Director and the Chairman will store and/or use personal information external to the Charity.

Other Trustees and Volunteers will process personal information only when the work of the Charity requires them to do so in which case they will follow the requirements of this policy.

In addition, the charity historically managed a special needs school which was closed permanently in July 2011 and, to comply with legal requirements for information retention, the required historic information on pupils and staff is kept in a secure locked archive store. Other historic archives from the school have been handed over to the Jewish Archives in Manchester Central Library which has strict controls on data protection and appropriate rules for access to interested parties.

RESPONSIBILITIES

Overall responsibility for personal data rests with the Board of Trustees.

All who process personal information must ensure they both understand and act in line with this policy and the data protection principles listed below.

POLICY IMPLEMENTATION

To meet our responsibilities information processors will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information is, as far as reasonably possible, up to date and accurate;
- Review periodically the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

TRAINING

Training and awareness raising about how the Data Protection Act is followed in this organisation will take the following forms.

On introduction of this policy, all information processors will read and review the policy, ensure they understand their obligations, and agree to fulfil them by signing and dating a copy.

On induction of new trustees, they will be required to read the policy, ensure they understand their obligations and agree to fulfil them by signing and dating a copy.

On introduction of any volunteers with a need to process personal information, they will be required to read the policy, ensure they understand their obligations and agree to fulfil them by signing and dating a copy.

General training/ awareness raising. If and when new types of information processing are introduced, those involved will remind themselves of the policy's requirements and ensure that they are applied to the new information processing.

GATHERING AND CHECKING INFORMATION

Before personal information is collected, we will check that the processes to be followed conform to the data protection principles listed above and take care to hold this data securely.

Periodically, those processing personal information will check that it remains accurate, that it continues to be used solely for the purpose for which permission was originally given and check whether it is still necessary to retain it. Any unnecessary personal data will be destroyed.

DATA SECURITY

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

Computer files containing personal data will be password protected and passwords will only be available to trustees or volunteers with a need to access that data and they will keep the passwords secure at all times. Passwords will be changed periodically.

Hard copy files containing personal data will be kept in locked cabinets.

Those processing personal information will ensure that any personal data kept on their mobile phones or tablet computers are kept secure with the exception that Trustees and Volunteers accept that their fellow Trustees and Volunteers need to keep minimum contact details for each other for the purposes of internal communications.

SUBJECT ACCESS REQUIREMENTS

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date

- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Administration Director at the Charity's operating address as published on its website. We may make a charge of £10 on each occasion access is requested.

On receipt of an enquiry by an individual to access their personal data, the individual will be asked to define the data the individual wishes to check and to give sufficient reasons for their request to ensure we answer to their satisfaction. Where there is any uncertainty as to the identity of the individual making the enquiry, we will also require clear proof of identity before access is granted.

Queries about handling personal information will be dealt with swiftly and politely. We 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 by the Act from receiving the written request and any relevant fee.

DECLARATION

I confirm I have read and understood Delamere Forest School Ltd's Data Protection Policy and will act in accordance with it.

I am connected with this organisation in my capacity as a

- Trustee
- Volunteer

Signature:

Print name:

Date: