



CARE In East Grinstead
and Lingfield
REGISTERED CHARITY NO. 800348

DATA PROTECTION POLICY GDPR (General Data Protection Regulation)

CARE in East Grinstead and Lingfield is a voluntary organisation and a registered charity with no premises. This policy applies to all volunteers of CARE in East Grinstead and Lingfield.

Introduction

The purpose of this policy is to enable CARE in East Grinstead and Lingfield to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect our clients, volunteers and other individuals;
- protect our organisation from the consequences of a breach of its responsibilities.
- meet the requirements of current and future proposed data protection regulations.

Brief introduction to the Data Protection Requirements

The Data Protection Regulation 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

CARE in East Grinstead and Lingfield will:

- comply with both the law and good practice;
- respect individuals' rights;
- be open and honest with individuals whose data is held;
- provide support for volunteers who handle personal data, so that they can act confidently and consistently.

CARE in East Grinstead and Lingfield recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. Information about 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, CARE in East Grinstead and Lingfield will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

CARE in East Grinstead and Lingfield, as a not-for-profit organisation is exempt from notification under the Data Protection Act 1998. All processing of personal data will, however, still be undertaken in accordance with the data protection principles. These eight principles are listed on Page 1.

Personal Information held - Personal Data

CARE in East Grinstead and Lingfield only maintains information essential for the efficient operation of the services provided.

Lists of all its volunteers, past and present, with names, addresses, e-mail addresses, telephone numbers, year of birth, their availability and the tasks that they are willing to undertake are recorded. This is essential for our work.

Lists of all our clients, both regular and occasional, are also kept with details of their names, addresses, telephone numbers, year of birth and any relevant information – eg that the client uses a walking frame - that a driver may need, as well as carers' names and contact details. These details are given to the volunteer undertaking a task with that client.

Lists of all activities (jobs) past and future: including information: date, time, venue, client and volunteer are recorded.

CARE has an archive policy of 5 years. Information of past activity, volunteers and clients is held for a period of 5 years.

DBS disclosures are held by the Volunteer Manager of CARE in East Grinstead and Lingfield. (See separate Policy Statement.)

How information is held

CARE in East Grinstead and Lingfield has no office or premises.

The bulk of our data is on a password protected database or in designated volunteers' homes. Some of the data is in paper form.

Access to information

CARE in East Grinstead and Lingfield utilises a web based system linked to a database to operate the services provided and maintain the data held.

Volunteer Access to this data (view, add, change, delete) is limited and appropriate to the volunteer's role: Duty Officer, Section Leader and Webmaster.

Whilst CARE maintains a 5 year archive policy for data as an audit trail of activity and to provide performance reporting, only current client and volunteer data is accessible to Duty Officers and Section Leaders. Ex client and volunteer information is hidden from view, as is historical information of jobs undertaken more than 108 days ago.

Processes to implement the 5 year archive policy will be applied at least biannually, permanently deleting old:

- Client records
- Volunteer records
- Job records
- Message board posts
- Rota records

Information is confidential to the organisation and may be passed to colleagues to ensure the best quality service for our clients. Data will not be shared outside of the organisation, other than to provide services to our clients.

Clients and volunteers are able to see what data is recorded about them on request.

Security

This section of the policy only addresses security issues relating to personal data. Any recorded information on clients and volunteers will be:

- Kept securely within the home
- Protected by the use of passwords if kept on computer
- Destroyed confidentially if it is no longer needed

Access to information on the main database is password controlled. Volunteers needing access have their own individual password and only have access to those parts of the database that they need to undertake their particular roles in the organisation. Volunteers are actively encouraged to regularly change passwords and always utilise unique passwords.

The web based system utilised by care utilises HTTPS (HTTP Secure) an extension of the Hypertext Transfer Protocol (HTTP) ensure secure communication of information over the internet, protecting the security of client information and volunteer passwords.

Data Recording and Storage

CARE in East Grinstead and Lingfield has a number of databases holding basic information about all clients and volunteers and a record of all activities undertaken.

Databases:

- Live - contains current client, volunteer and activity data
- Training – contains dummy client and activity data, but holds some details of real volunteers to enable said volunteers to access training system
- Backup – is a copy of the Live system

The back-up data is kept securely on UBS Flash Drives. CARE in East Grinstead and Lingfield 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 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;
- Data will be corrected if shown to be inaccurate.

CARE in East Grinstead and Lingfield stores archived paper records of volunteers' details securely in named volunteers' homes.

Responsibilities

The Committee recognises its overall responsibility for ensuring that CARE in East Grinstead and Lingfield complies with its legal obligations.

Policy review

The policy will be reviewed at the first meeting of the incoming Executive Committee after the Annual General Meeting each year. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.