

last review: May 2023..... date of next review: 2026.....

*This policy will be reviewed every 3 years.*

## DATA PROTECTION POLICY

Our values are

Including & Accepting, Empowering & Enabling, and Growing & Transforming.

We see a community where young people:

- belong, are accepted and growing in including others
- can contribute, make a difference and impact their locality
- are growing in confidence, resilience and their ability to cope with challenges.

### Policy Statement

At THRIVE LEEDS, we collect and use personal data from our trustees, staff, volunteers, supporters, families and associates.

We are committed to:

- protecting the privacy of all those whose personal information we hold
- keeping personal data up to date and rectifying any errors
- treating all personal data as strictly confidential
- storing all information securely, protecting it from loss, misuse, unauthorised access and disclosure
- destroying all information which ceases to be relevant to us
- complying with GDPR (General Data Protection Regulation)

### Purpose

The purpose of this policy is to provide clarity about the purpose and principles of data protection and our responsibility to protect other people's privacy.

Failure to comply with GDPR is unlawful and could result in legal action being taken against THRIVE LEEDS.

### Principles

#### **1. Lawful, fair and transparent**

In practice: there will be legitimate grounds for collecting data and clarity about how it will be used.

#### **2. Limited to its purpose**

In practice: data collected for specified and explicit purposes will not be used in any other way.

#### **3. Adequate and necessary**

In practice: unnecessary data will not be collected.

#### 4. Accurate

In practice: reasonable steps will be taken to keep the information up to date and to correct inaccuracies.

#### 5. Not kept longer than needed

In practice: data will not be kept for longer than is needed, and data which is inaccurate, out of date or no longer required will be appropriately destroyed or deleted.

#### 6. Integrity and confidentiality

In practice: data will be kept safely and securely. It will be processed in a way that ensures appropriate security, including protection against unauthorised or unlawful processing, loss, damage or destruction.

#### Safeguarding:

Exclusions may apply to elements of this policy for the purposes of safeguarding individuals. All such situations will be properly recorded. THRIVE LEEDS accepts responsibility for proving that the legitimacy of such exclusions has been carefully considered and that, notwithstanding this assessment, the 6 key principals of the GDPR are maintained as far as possible.

#### Procedures

The following procedures have been developed in order to ensure that THRIVE LEEDS meets its responsibilities in under GDPR. For the purposes of these procedures data collected, stored and used by THRIVE LEEDS falls into 2 broad categories:

1. **THRIVE LEEDS internal data records:** trustees, employees, volunteers
2. **THRIVE LEEDS external data records:** families, associates

Under GDPR, the Trustee Body of THRIVE LEEDS is the 'DATA CONTROLLER' (responsible for determining the purposes for which and the manner in which any personal data is to be processed). The Trustees and the Project Coordinator share responsibility for the policy's implementation.

THRIVE LEEDS is exempt from the need to register with the Information Commissioner's Office as a not-for-profit organisation that processes data only for its own internal purposes, because we:

- only process information necessary to establish or maintain membership or support;
- only process information necessary to provide or administer activities for people who are involved with THRIVE LEEDS;
- only share the information with people and organisations necessary to carry out THRIVE Leeds' activities.
- only keep the information while the individual is involved or as long as necessary for administration.

Data held by THRIVE LEEDS will be subject to an annual audit, which will assess the following:

- Description of data
- Why is the data held and what is it used for
- Basis for processing data (e.g. consent, legal obligation, etc)
- Who holds the data and who can access it?
- What security controls are in place?
- How long is the data kept for?
- Is this covered by our privacy notice?
- ACTION REQUIRED

## **INTERNAL DATA RECORDS**

### **Internal Data Records - purpose:**

At THRIVE LEEDS, we obtain personal data (names, addresses, phone numbers, email addresses), application forms, references, and in some cases other documents from staff, volunteers and trustees. This data is stored and processed for the following purposes:

- Recruitment
- Equal Opportunities monitoring
- Volunteering opportunities
- Payroll
- To distribute relevant organisational material e.g. meeting papers
- to provide information as necessary to those who provide services to us: e.g. insurance company, Charity Commission, Inland Revenue, grant givers

### **Internal Data Records - access:**

The contact details of staff, volunteers and trustees will only be made available to other staff, volunteers and trustees, and then only in accordance with the principle and practice guidelines of this policy.

Any other information, for example, personal information supplied on application for a role in the organisation, will be stored in a secure filing cabinet and/or in an encrypted file on the computer. It will not be accessed during the day to day running of the organisation.

Contact details of staff, volunteers and trustees will not be passed on to anyone outside the organisation without their explicit consent or unless this contact is already publicly available (for example as minister of a church).

Staff, volunteers and trustees will be supplied on request with a copy of their personal data held by the organisation, along with details of any third party (as above) with whom their details have been shared.

All confidential post must be opened by the addressee only.

### **Internal Data Records: personnel files: Accuracy and Timescales**

At THRIVE LEEDS, we will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for 6 years after an employee, volunteer or trustee has worked for the organisation, unless there is a specific and legitimate reason for it to be kept on record (which shall be recorded). The Secretary to the board of trustees will be responsible for seeing that personnel files are destroyed.

### **Internal Data Records: means of storage**

Personal data may be kept in paper-based systems and on password-protected computers.

When any data needs to be moved it will be done in an organised and secure fashion. Moving data in this way should be kept to a minimum and there should be good reason for doing so.

### **Internal data records: use of photographs and other media**

Consent to the use of photographs, videos and sound recordings of staff, freelancers, volunteers and trustees on the THRIVE LEEDS website, social media and evaluations/reports will be sought via a signed agreement at the commencement of their role. Permission will not be sought each time and will remain valid for the duration of that contract. Nevertheless, individuals will be given the right to refuse with no consequence to their contract or relationship with us. In all other ways, photographs/recordings will be subject to the same procedures as outlined elsewhere in this document.

## **EXTERNAL DATA RECORDS**

### **External data records: purposes**

At THRIVE LEEDS, we obtain personal data (such as names, addresses, and phone numbers) from families who use our services and from associates who may be visitors to groups or those involved in venues visited.

This data is obtained, stored and processed solely to provide the services THRIVE LEEDS provides or, after receiving specific consent, in order to inform families of other similar services which may be of interest.. Families and associates will be provided with a privacy notice outlining the purposes for which data is collected, the means by which it will be stored, the length of time it will be stored and their rights according to GDPR.

### **External data records: consent**

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner, unless there is a legal duty of disclosure under other legislation.

### **External data records: access**

Only those directly involved in delivering the above services and the trustees will have access to this data, which will be kept in a secure filing, paper or electronic system.

All confidential post must be opened by the addressee only.

Trustees, employees and volunteers at THRIVE LEEDS will be made aware of this GDPR policy and of their obligation not to disclose personal data to anyone outside the organisation.

Individuals will be supplied on request with a copy of their personal data held by the organisation.

### **External data records: accuracy and timescales**

At THRIVE LEEDS, we will take reasonable steps to keep personal data up to date and accurate.

Personal data will be stored for as long as the data owner uses our services, or longer if a legitimate purpose can be argued in accordance with the GDPR. The keeping of these records and the legitimacy of purpose will be reviewed on an annual basis.

If a request is received from an organisation/ individual to destroy their records, we will ensure this is done. This work will be overseen by the secretary along with the Project Coordinator.

### **External data records: means of storage**

Personal data will be kept in paper-based systems and on password-protected computers. It will only be moved with a good reason and with great care.

### **External data records: use of photographs and other media**

Photographs, videos and sound recordings of individuals will be treated as identifiable data whenever they show faces or other highly distinguishable features of an individual. THRIVE LEEDS will seek the consent of individuals before photographs are taken/ recordings made via the acceptance of the privacy statement.

The Project Coordinator will ensure that identifiable photographs/recordings will only be taken of those who have given express consent. All other photographs/recordings must exclude faces or other highly

distinguishable features of the individual. In all other ways, photographs/recordings will be subject to the same procedures as outlined elsewhere in this document.