

DATA PROTECTION POLICY

1. PURPOSE OF THE POLICY

- 1.1 This policy has been approved by the Trustees of the Squad. It reflects our legal obligations to use and store personal data as a data controller in accordance with applicable legal rules, particularly the Data Protection Act 2018 (“DPA”) and the General Data Protection Regulation (“GDPR”).
- 1.2 The policy must be followed by all staff, volunteers and trustees. The policy and its schedules out the types of personal data we receive and from whom, why we use it , how we store it and the rights of each person whose data we receive. It recognises that some of the data it receives may be special category personal data in respect of which additional legal safeguards apply. The meaning of key technical terms used in the legislation referred to in this policy are set out in a brief glossary at the end of the policy.

2. LEGAL OBLIGATIONS

- 2.1 In relation to the collection and processing of personal data the Squad will comply with Article 6(1) of the GDPR and the six data protection principles set out in of the DPA.
- 2.2 In relation to the collection and processing of special category data it will comply with Article 9 (2) of the GDPR and section 10 of the DPA.
- 2.3 The Squad recognises the particular importance of the requirement that all proper steps must be taken to ensure appropriate security of personal data. This includes the following;
 - 2.3.1 Ensuring that only those persons with a clear need to access any personal data do so.
 - 2.3.2 Informing each such person of their ongoing obligation to respect the security of any personal data.
 - 2.3.3 Ensuring that all such personal data is at all times stored appropriately and disposed of appropriately, either by any member of staff, volunteer or trustee who had to access to the data and who leaves the Squad, or when the data is disposed of because it is no longer appropriate to retain it.
 - 2.3.4 Ensuring that any person or body outside the Squad with whom personal data is shared is obliged to take all reasonable steps to comply with its legal obligations under the DPA and the GDPR.

3. RIGHTS OF DATA SUBJECTS

The Squad will ensure compliance with all rights of those whose personal data it receives. These include the following rights;

- 3.1 access to the personal data held about them;
- 3.2 to rectify any personal data that the data subject considers is inaccurate;
- 3.3 to erase their personal data in certain situations;
- 3.4 to require the restriction of dealing with their personal data in certain situations;
- 3.5 to object to the Squad dealing with their personal data in certain situations;
- 3.6 to ask the Squad to transfer their personal data to another organisation in certain situations.

4. INCIDENT MANAGEMENT

While the Squad will make every effort to comply with these obligations, should any personal data be disclosed to anyone outside the Squad who is not authorised to receive it or if any personal data

shall be lost it shall comply with its legal obligations to notify the Information Commissioner's Office and/or the Charity Commission.

5. PRIVACY NOTICES

The schedules to this policy set out the privacy notices which the Squad is obliged to issue to those whose personal data we hold and which explain how, when and why their data will be processed and for how long it will be stored.

6. COMPLAINTS

If any data subject has any concern about the Squad's use of their personal information they should make a complaint to Peter Frost, the trustee with overall responsibility for the compliance with this policy at peter.frost@thesquad.org.uk.

You can also make a complaint to the ICO if you are unhappy with how we have dealt with your personal data.

The ICOs address is
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline Number 0303 123 1113
ICO website <https://www.ico.org.uk>

GLOSSARY [TO BE COMPLETED]

Schedule 1 **[ADDITIONAL NOTICES REQUIRED FOR VOLUNTEERS, MEMBERS AND TRUSTEES]**

PRIVACY NOTICE FOR EMPLOYEES

Our contact details

The Squad

John Innes Youth Centre etc

Phone Number

Email

[Date of finalisation of policy]

THE TYPE OF PERSONAL DATA WE COLLECT

We currently collect and process the following information:

-Name and contact details

-Other....

HOW WE OBTAIN THE PERSONAL DATA AND WHY WE HAVE IT

The personal data we have is provided to us directly by you for one of the following reasons:

[Insert why we collected the personal data]

We use the information that you have given us in order to [list how we use the personal data]

[We may share this data with []]

Under the GDPR the lawful justifications we rely on for processing this information are:

- (a) Your consent. You may remove this consent at any time by contacting Peter.frost@thesquad.org.uk
- (b) We have a legitimate interest
- (c) [We have a legal obligation-probably required where DBS checks needed].

HOW WE STORE YOUR PERSONAL DATA

Your personal data is securely stored.

We keep [type of personal data] for [time period]. We will then dispose of your information by [explain how].

YOUR DATA PROTECTION RIGHTS

Please see paragraph 5 of the Data Privacy policy.

HOW TO COMPLAIN

Please see paragraph 6 of the Data Privacy policy.