

The Abingdon DAMASCUS YOUTH PROJECT (ADYP)

Registered charity No. 1098966

Data Protection, Use and Storage Policy

1. Aim

The Trustees of ADYP aim to ensure that all personal data about the beneficiaries of ADYP and their parents or guardians and other individuals are collected, stored and processed in accordance with the General Data Protection Regulation (GDPR).

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#).

2. Purpose of this Policy

The Trustees of ADYP take their obligations to protecting any personal data held very seriously and the purpose of this policy is to set out the arrangements for how Trustees, staff and volunteers use store and protect any data they manage. It outlines the types of data that we hold and how we use them. We will review this Policy annually.

3. Definitions

TERM	DEFINITION
Personal data	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified
Sensitive personal data	Data such as: <ul style="list-style-type: none">• Contact details• Racial or ethnic origin• Political opinions• Religious beliefs, or beliefs of a similar nature• Where a person is a member of a trade union• Physical and mental health• Sexual orientation
	<ul style="list-style-type: none">• Whether a person has committed, or is alleged to have committed, an offence• Criminal convictions
Processing	Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
Data subject	The person whose personal data is held or processed
Data controller	A person or organisation that determines the purposes for which, and the manner in which, personal data is processed
Data processor	A person, other than an employee of the data controller, who processes the data on behalf of the data controller
Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

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4. The Data Controller

ADYP processes personal information relating to beneficiaries (young people and vulnerable adults), parents/guardians, employees, volunteers and others, and, therefore, is a data controller.

ADYP is not currently required to register with the Information Commissioner's Office and this requirement will be reviewed annually.

5. Roles and Responsibilities

This policy applies to all staff employed by ADYP and volunteers who manage data on behalf of ADYP, and to external organisations or individuals working on our behalf.

a. Trustees

The Trustees have overall responsibility for ensuring that ADYP complies with all relevant data protection obligations. The Data Protection Officer acts as the representative of the data controller on a day-to-day basis.

b. Data Protection Officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the Trustees and, where relevant, report to the Trustees their advice and recommendations on ADYP data protection issues.

The DPO is also the first point of contact for individuals whose data the ADYP processes, and for the ICO.

Our DPO is Trustee and Treasurer Hans Sundin and is contactable via hsundin5105@googlemail.com.

c. Volunteers

Other than the volunteer DBS coordinator and officers of the Trustee Management Committee, no volunteer holds or has access to personal data. All volunteers are required to follow this policy.

The DPO provides advice and guidance to home-based volunteers, who use their own electronic equipment to fulfil their role with ADYP, to maintain the security of data remotely. Home-based volunteers are required to:

- Be aware of their work space and ensure no personal data are accessed by other people (e.g. family members)
- Store any paper-based notes in a locked drawer or filing cabinet
- Set up passwords on ADYP data files and email files to ensure that other users of the equipment cannot access ADYP data, on purpose or inadvertently
- Comply with the ADYP Data Retention and Data Disposal Policies
- Dispose of all ADYP data in accordance with the Data Disposal Policy.

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d. All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the DPO of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 - If they need help with any contracts or sharing personal data with third parties

6. Child Protection and Privacy

ADYP operates in the youth sector, interacting with young people from aged 10 years+. Where relevant, and if there exists a conflict, Child Protection legislation and policy takes precedent over GDPR.

7. Types of Information

Information, or data, that we hold is done so on a consent or legitimate interests basis, meaning that we hold and use information based on your permission (consent) to do so or on the requirement for that information to provide our services (legitimate interests), such as permission to take young people on a trip.

There are three main types of information ADYP holds to provide services to young people:

Information you give us

Information will typically be provided to us via a form. This form may be accessed online, such as a membership application on our website, or via a physical form at or during a ADYP event, such as a registration form or sent by home with a young person.

Information that technology gives us

Like the majority of websites, ADYP website uses modern technology and data provided by you and your browser to try and provide the best service and experience we can. Information is sometimes automatically passed between your chosen technology and ADYP's technology by accessing our digital services. The most common usage is website analytics and browser cookies.

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Cookies may be used on our website. A cookie is a very small text file that is placed on your computer's hard drive when accessing a website and it collects standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

You can set your browser to refuse cookies and you can find out more information on how to refuse and delete cookies at <http://www.aboutcookies.org>. However, please note that some of this website may not function as a result.

Electronic communications

We may communicate with you by email.

8. How Information is Used

We use any information you provide to us to fulfil the service or services related to your information. For example, to take young people on a trip, we will ask for parent/guardian consent with details of emergency contact, medical information etc. about the young person. In essence, the information is directly related to being able to fulfil the service we set out to provide or that required by law.

The core uses of personal data held by ADYP are:

- As required by law, legal process or regulation
- To provide, update, maintain and improve our services
- To communicate and respond to requests, comments and questions
- To send service emails and other communications essential to providing membership and services
- For payroll, billing, account management and other administrative matters
- To maintain security and standards

In addition:

- We may use data to analyse our services e.g. satisfaction surveys and programme evaluation surveys to see how we are doing and take on board feedback
- We may profile data on age or gender basis e.g. we occasionally seek to understand our membership demographics to improve our offering and complete our annual reporting
- We may profile data for aggregated statistics to complete reports e.g. we are often required to complete annual reports for programmes we run as a contractual obligation

9. The Data We Hold

ADYP maintains a record of current, former and prospective young people with whom it engages. The personal data we store and process, the majority of which is given to us by parents/guardians but some of which we may obtain from other sources, may include:

- name, title, gender and date of birth;
- contact details including postal address, email address, phone number;

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- consent forms would require emergency health information such as allergies;
- records of donations and Gift Aid status, where applicable (as required by HMRC);
- records of communications sent to you by ADYP or received from you;
- volunteering by you on behalf of ADYP.

10. Photographs and Videos

As part of our activities, we may take photographs and record images of ADYP events in which individuals are taking part.

We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and young person.

Uses may include:

- Within brochures, newsletters etc.
- External agencies such as the newspapers, campaigns
- Online on our website or social media pages
- Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

11. Sharing Information

Some ADYP programmes, events or activities are supported or funded by other organisations. These programmes and events can require that reporting, financial and evaluation data be shared with the supporting funder or partner as a condition of contract. We will always make you aware of where this applies.

Where applicable consent has been obtained, we will share potentially sensitive personal information for monitoring engagement, reach and impact of the programme. Where such consent is not given, all data recorded and shared with the funding organisation is fully anonymized.

ADYP never sells data to third parties.

12. Security and where Information is Stored

ADYP takes every reasonable precaution to ensure any data we hold is secure and stored according to GDPR.

Access to any ADYP system is always protected by the requirement for secure login to our systems. Any physically held data is protected in locked filing cabinets.

Our project data is maintained in Microsoft Excel databases. These databases are stored locally on a secure server. Users must be physically on ADYP premises, sign in to a centrally-managed profile and have password access to each database.

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13. Data Retention

ADYP will only retain personal information for as long as necessary to fulfil the purposes for which the data was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

14. Individual Rights

GDPR provides certain rights for individuals. These are how they apply to ADYP:

1. The right to be informed – the core purpose of this policy; we aim to tell you about the collection of personal data.
2. The right of access – you have access to your personal information (often called a “data subject access request”). This enables you to ask for a copy of the personal information we hold about you. This is normally free but please note that, as per ICO guidelines, an administration fee may apply, “when a request is manifestly unfounded or excessive, particularly if it is repetitive.”
3. The right to rectification – in clearer words, the right to have corrections made. This a shared obligation between us to keep personal data as up to date as is practical.
4. The right to erasure - this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
5. The right to restrict processing - This enables you, where appropriate, to ask us to suspend the processing of personal information about you. For example, if you are checking the accuracy of information we hold.
6. The right to data portability – in clearer words, the ability for you to take personal data from us to an alternative supplier. Less relevant to our operations but the right remains.
7. The right to object - where we are using a legitimate interest basis and there is something which makes you want to object to processing on these grounds. This may mean we are unable to provide some services to you.
8. Rights in relation to automated decision making and profiling - automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Review The Trustees will review procedures annually and continue to make newcomers aware of the policy. It will be included at induction.

The procedures laid out in this policy are with regard to legislation defined by the:

Data Protection Act 1998

General Data Protection Regulation (GDPR) 25 May 2018.

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Declaration

On behalf of ADYP we, the undersigned, will oversee the implementation of the Safeguarding Policy and Training and take all necessary steps to ensure it is adhered to.

Signed:

P. E. Napper

H. Sundin

Name: Patricia Napper

Name: Hans Sundin

Position within Organisation

Position within Organisation

Chairman

Data Protection Officer

25/11/2018

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We recognise that it is important for us to regularly review this policy to ensure that it reflects up to date legislation and best practice.

A review of our Safeguarding Policy will be carried out on an annual basis as a minimum and any necessary actions taken.

This policy is available in large print and on tinted paper on request.