

Data Protection, Confidentiality and Access to Information policy

1 Introduction

- 1.1 Building for the Future sometimes needs to collect and use certain types of information about people in order to operate an effective and efficient service and ensure that services are appropriate to the needs of our customers. This could include information about current, past and prospective employees, volunteers, suppliers, clients/customers, Trustee Board members and others with whom it communicates.
- 1.2 Building for the Future also aims to provide a high standard of service and to be as open as possible in its dealings with customers. For the purpose of this policy those people as mentioned in paragraph 1.1 are referred to as 'data subjects'.
- 1.3 Personal information must be dealt with properly however it is collected, recorded and used; whether on paper, in a computer, or recorded on other material. There are safeguards in the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) to ensure this.
- 1.4 The lawful and correct treatment of personal information by Building for the Future is very important to successful service provision, and to maintaining confidence between the charity and those with whom it deals.

2.0 Statement of Intent

- 2.1 All information will be treated lawfully and correctly by Trustee Board members and employees or volunteers of Building for the Future and those who act on behalf of the charity.
- 2.2 Building for the Future will:
 - Clearly define and maintain the Policy with regard to confidentiality of information;
 - Ensure that Building for the Future meets its obligations under the Data Protection legislation;
 - Be as open as possible in its dealings with customers and meet obligations concerning the provision of information.

Policy Statement

3.1 Building for the Future believes that people have a right to see what information is kept about them. We fully endorse and will adhere to the principles of data protection, as specified in the Data Protection Act 1998 and other related legislation (GDPR).

3.2 Specifically, the principles require that personal information:

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- Shall be obtained only for one or more specified and lawful purpose(s), and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- Shall be accurate and, where necessary, kept up-to-date;
- Shall not be kept for longer than is necessary for that purpose or purposes;
- Shall be processed in accordance with the rights of data subjects under this Act;
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.

4 Data Protection

4.1 Data Controller

4.1.1 The Data Controller is Building for the Future

4.1.2 Building for the Future will ensure that there is someone with specific responsibility for Data Protection and related legislation in the charity. Currently, the nominated person is the Chief Executive.

4.2 Access to the information held

4.2.1 Building for the Future has a responsibility to ensure that data subjects have proper access to the information that the charity holds about them. The procedure for processing requests requires a written request from the person. We must comply with the request within one calendar month.

4.3 Obligations

4.3.1 In compliance with the Act, Building for the Future will, through appropriate management and application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information;
- Meet its legal obligations to specify the purposes for which information is used;
- Collect and process appropriate information in a confidential manner ensuring that the data held is not excessive but sufficient to fulfil operational needs or to comply with any legal requirements;
- Will dispose of data when it is no longer required (subject to any statutory requirements);
- Ensure that necessary and sufficient steps are taken to ensure the quality of information used;
- Apply checks to determine the length of time information is held;
- Ensure that the rights of people about whom the information is held can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken;
 - The right of access to one's personal information;
 - The right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information.
- Take appropriate technical and organisational security measures to protect personal information against damage, loss, misuse or inappropriate disclosure;

- Ensure that transfer of data is done in a lawful manner with due regard for security;
- Ensure that personal information is not transferred abroad without suitable safeguards and that appropriate contract for data use is in place.

4.4 Security

4.4.1 Paper records

Sensitive information such as , medical details, ethnic origin, etc will be kept secure at all times. This will be achieved through a combination of restricted access to offices and locked file storage systems.

4.4.2 Computerised records

Sensitive information such as, medical details, etc will be held secure within the IT systems, and access to data will only be given to those who need it for the performance of their duties. Systems should be password protected to minimise the risk of information being accessed by unauthorised users.

4.4.3 Trustee Board members

Board members have no right to be given any personal information about customers.