



Data Protection Policy

Updated: by Sue Brown, Project Manager 20th June 2019

Ratified at Board meeting on 9th July 2019

Purpose:

Growing Works adheres to all relevant legislation with regards to the obtaining, storing and the processing of data at all times and in all that we do. To achieve this aim, we will process personal information: -

- Fairly & lawfully
- For one or more specified lawful purposes
- Ensuring that it is accurate, relevant and not excessive
- Ensuring that it is kept up to date
- Ensuring that is not kept longer than necessary
- In line with the rights of the individual
- In a secure environment with appropriate safeguard measures
- Ensuring that any sharing of information is documented and has the consent of the data subject
- Ensuring that consents are not ambiguous, and are received for each type of data use
- Clearly explaining how data will be used
- Ensuring that consent can be removed if requested, and stored data deleted appropriately.

Scope:

This Policy applies to all employees, directors and stakeholders and is non-contractual.

Definitions & Abbreviations: N/A

Policies & Responsibilities:

The Project Manager is responsible for ensuring that the organisation meets the requirements of the Data Protection Act 2018 by:

- Ensuring the appropriate technical and organisational measures are in place to protect personal information.
- Having in place policies and procedures specifying any employee or stakeholder monitoring.
- Annually reviewing data protection procedures and policies.

Employee/Stakeholder Data

The Project Manager is responsible for:

- Approval of access provision of personal files and data to outside agencies as appropriate.



- Collating personal details relating to employees and stakeholders in manual and electronic form fairly and lawfully and ensuring this data is current and correct.
- Ensuring files are kept confidential and in a secure and dry environment - data is on secure cloud storage (one drive) and saved to password protected external hard drive.
- Providing employee's and stakeholders with access to their personal file on request within 15 days.
- Ensuring that any personal or statistical information not required is disposed of in a confidential manner e.g. shredding.
- Ensuring that relevant consents are obtained and clearly documented.

Recording

All personal records will be collated and processed fairly & lawfully and kept current and correct by the Project Manager and support staff approved by Project Manager. These records will be kept in a secure and dry environment and kept no longer than necessary. Records will be made available to the individual on request, and details shared only with specified outside agencies.

Growing Works will ensure that personal or statistical information not required is disposed of in a confidential manner for example; shredding, or permanent removal from computer files.

In the event of a breach of data protection the incident must be reported to the Project Manager who will investigate and where necessary inform any persons involved. Where possible data must be recovered and secured with any actions taken documented in order to improve data procedures.

Good Practice Ensures:

- Individuals have a clear understanding of how their personal details are used within the network and by specified agencies.
- Clear guidelines ensure that the charity complies with the Data Protection Act and General Data Protection Regulation.
- Data is not kept unnecessarily and is disposed of/deleted appropriately