



IG Data Protection Policy

Version 2

Document Owner		Business Director	
Date Originated		January 2019	
Signed off by			
Review Period		1 Year	
Date of Next Review		March 2022	
Reviewer	Version	Revisions Made	Date
Hilary Dutta (Business Director)	V2	Name of BD, updated format	March 2021

Introduction

Everyone has rights about the way their personal information is handled. Inclusion Gloucestershire will collect, keep and use information about their staff, customers, suppliers and other third parties. They know that they must treat information lawfully.

Inclusion Gloucestershire is fully committed to protecting the rights and privacy of individuals, in accordance with the Data Protection Act 1998 and the General Data Protection Act (25 May 2018). Information relating to the charity personnel, clients and other individuals is only processed in line with established regulations. Personal data is collected, recorded and used fairly, stored safely and securely and not disclosed to any third party unlawfully. As the lawful and correct treatment of personal information is critical to our successful operations and to maintaining confidence, Inclusion Gloucestershire is committed to:

protecting client personal details by:

- keeping personal data up to date and confidential
- maintaining personal data only for the time period required
- releasing personal data only to authorised individuals/parties and not unless permission is given to do so
- collecting accurate and relevant data only for specified lawful purposes
- adhering to regulations and related procedures to ensure that all employees who have access to any personal data held by or on behalf of Inclusion Gloucestershire are fully aware of and abide by their duties under the Data Protection Act 1998 and General Data Protection Act (25 May 2018).

Charity personnel are required to report any allegation in relation to the unlawful treatment of personal data to the data protection officer. A complaint should be made in the event that any individual feel that records of his/her personal data have been: -

- lost
- obtained through unlawful disclosure or unauthorised access
- recorded inaccurately and/or in a misleading manner
- provided to a third party without permission.

Where required, Inclusion Gloucestershire will take appropriate action/corrective measures against unauthorised/unlawful processing, loss, destruction or damage to personal data.

People in Inclusion Gloucestershire must follow this policy when they are collecting or using personal information in their work, if they do not, they may have a disciplinary.

Definitions of terms in this policy

Data – this is information which is kept on a computer or in a paper file.

Data Subjects – these are the people Inclusion Gloucestershire keeps personal information about.

Personal Data – this is information about a person that means they can be identified, this could be things like name, address, age or opinions about a person.

Data Protection Officer – the data protection officer for Inclusion Gloucestershire is the Business Director. This person makes sure that Inclusion Gloucestershire are acting lawfully when they keep or use personal information.

Data Users – these are people who work for Inclusion Gloucestershire and who keep or use personal information in their job. They must make sure they keep information safe and follow the policy.

Data Processors – these are people or organisations who don't work for Inclusion Gloucestershire, that we ask to work with personal information on our behalf.

Processing – this is when Inclusion Gloucestershire do things like, collect, record or hold personal information or when we change, use or destroy information.

Sensitive Personal Data – this could be information about a person's race, religion, sexual orientation, physical or mental health or things about offences. This information has special rules which includes permission from the person it is about.

Subject Access Request – this is when someone asks to see the information Inclusion Gloucestershire has about them.

Data Owner

About this Policy

The types of information Inclusion Gloucestershire might need to handle includes, information about staff, volunteers, members, supporters, suppliers, customers or commissioners and others that we communicate with.

This policy says how we will process personal data that we collect from data subjects or is shared with us by data subjects or others (see definitions).

This policy is not part of an employee's contract and it might be changed at any time.

The policy sets out the rules and legal conditions that Inclusion Gloucestershire must meet when they collect, store or use personal information.

Data Protection Principles.

There are 8 principles of good practice that anyone processing personal data must comply with.

1. Information is processed fairly and lawfully
2. Information is processed appropriately and for limited reasons
3. Information is relevant and the right amount
4. Information is accurate
5. Information is not kept for longer than needed
6. Information is processed in line with data subjects' rights
7. Information is kept safe
8. Information is not shared to countries without proper data protection

Fair and lawful processing

Inclusion Gloucestershire must make sure they process information in line with the Data Protection Act. This means they must do things like, make sure people agree to Inclusion Gloucestershire processing their information or that it is necessary to process information.

When Inclusion Gloucestershire processes sensitive information, they will take extra care and meet extra conditions.

Processing for limited reasons

Inclusion Gloucestershire may process information they receive directly from people about themselves, such as membership forms, letters, e-mails or phone. They might process information they get from others such as partners, commissioners and organisations they quality check.

Inclusion Gloucestershire will only process personal information permitted by the Data Protection Act, they will tell people why they are collecting information and what for.

Notifying data subjects

If Inclusion Gloucestershire collects information from people, they will tell them:

- a. Why and what the information is for.
- b. Who they will share the information with (if they plan to share it).
- c. How people can limit how Inclusion Gloucestershire uses their information.

If Inclusion Gloucestershire gets information about a person from somewhere else, they will make sure they tell them as soon as possible.

Inclusion Gloucestershire will make sure they let people know who their Data Protection Officer is and how to contact them.

Inclusion Gloucestershire will make sure that they tell anyone filling in a membership form, that their information will be kept electronically and will be updated when people tell them things like change of address or phone number.

Inclusion Gloucestershire will delete information about people if they are informed that they no longer wish to be part of the membership or other service.

Information is relevant and the right amount

Inclusion Gloucestershire will only collect information that is relevant to their work and has been described to the people they are collecting from.

Information is accurate

Inclusion Gloucestershire will make sure the information they have is accurate and up to date. Inclusion Gloucestershire will make sure the information is correct when they receive it and then check every so often that the information is still correct.

Information that is incorrect or out of date will be changed or destroyed.

People will need to tell Inclusion Gloucestershire if their personal information has changed. This applies to employees, volunteers, members, commissioners, partners and so on.

Processing in line with data subjects' rights

Inclusion Gloucestershire will make sure they process personal information in line with people's rights.

- I. Their right to ask to see information held about them.
- II. Their right to stop their information being used for marketing purposes.
- III. Their right to have wrong information amended.
- IV. Their right to stop the use of information that could cause distress to themselves or someone else.

Data Security

Inclusion Gloucestershire will make sure they process personal information safely. They will act if they know information has been used without permission or unlawfully. Inclusion Gloucestershire will protect information from accidental loss or damage.

Inclusion Gloucestershire will make sure they have policies and procedures to keep personal information safe from when they collect it. Everyone in Inclusion Gloucestershire working with personal information must comply with these policies and procedures.

If an employee is working from home or another place and they need to access data held by Inclusion Gloucestershire, they must follow the guidance about how to keep the data safe.

Inclusion Gloucestershire will make sure information is secure by;

- **Confidentiality** - only letting people who are authorised see information
- **Integrity** - making sure personal data is accurate and suitable for the reason it is needed
- **Availability** - making sure the information is available to people who have permission to use it. This means making sure information is stored electronically on the shared drive and not in personal storage or desktops.

Other security measures include:

- Anyone who is not supposed to be in offices and workspaces will be reported.
- Visitors will sign in to the building and be escorted to and from meetings etc.
- Desks and cupboards will be kept locked if they contain personal information.
- Paper documents that are no longer needed will be shredded. Digital devices for storing information will be destroyed when they are no longer needed.
- Data users will take reasonable steps to ensure information on their computer screens is kept confidential and that computers are locked / logged off when left unattended.

Disclosure and sharing of personal information

Inclusion Gloucestershire might share information with others if:

- Inclusion Gloucestershire become part of another organisation
- They must because it is the law
- They must to protect the rights, property or safety of employees, members, volunteers, commissioners or others.

Dealing with subject access requests.

If someone wants to see the information Inclusion Gloucestershire has about them they need to make a request in writing to the Data Protection Officer. They will need to pay £10.

If a request for information is made by telephone, information will only be shared if;

- A check has been done and the caller is entitled to the information they are asking for.

- If Inclusion Gloucestershire is not able to check who the caller is and if they should have the information, they will ask them to make a request in writing.

For Employees.

Breaches of the data protection principles.

If you think that the principles of good data protection have not been followed about your personal information or other peoples', you should talk to your line manager.

Inclusion Gloucestershire will take any breaches of the data protection principles very seriously and may take disciplinary action.

Fair processing notice.

Inclusion Gloucestershire will process personal information about their staff whilst doing its work. Information may be stored on paper, electronically or otherwise. Inclusion Gloucestershire know that they must treat information in a lawful manner in accordance with the Data Protection Act 1998 and General Data Protection Act (25 May 2018). This notice tells you how Inclusion Gloucestershire will handle your personal data.

How Inclusion Gloucestershire are likely to use your personal data.

Inclusion Gloucestershire will process information about their employees for legal, personnel, administrative and management purposes, for example to pay people, monitor performance and other tasks.

Inclusion Gloucestershire may process sensitive information about employees such as;

- I. Information about an employee's physical or mental health or condition so they can monitor sick leave and take decisions about an employee's fitness to work.
- II. An employee's racial or ethnic origin or religious or other information so they can make sure they are complying with equal opportunities laws.
- III. Information needed to comply with the law and meet obligations to third parties.

Processing for limited purposes.

Inclusion Gloucestershire will only use your information for the purposes they have explained to you or for other reasons allowed by the Data Protection Act.

Providing information to third parties.

Inclusion Gloucestershire will not share your information with third parties without your consent unless they are sure that the third party is entitled to the information by law. If Inclusion Gloucestershire does share your information they will make sure they do it within the data protection principles.

Appendices

Appendix 1

Privacy Statement

Inclusion Gloucestershire in a Registered Charity No: 1171559 and a Registered Company No: 10143162

At Inclusion Gloucestershire, we are committed to safeguarding the rights and privacy of users of our services and visitors to our website and to our offices and other venues that we use. This means that we do not collect or store your personal information with no reason and without your permission, and we do not sell, trade, or otherwise exchange email lists with other organisations for marketing purposes.

This privacy notice provides details of when and why we collect your personal information, how we use it, the limited circumstances when (with your permission) we may share your information with others, and how we keep it secure.

Why we hold your data

We hold your personal data in order to be able to provide our services as an advice and support organisation and to administer and evaluate our projects. The lawful basis for processing your information is therefore for legitimate interests – e.g. to be able to contact you in relation to your query, to support you in your volunteer role, to check on the status of your organisation, to administer events onto which you are booked, to conduct monitoring and evaluation of the services we deliver.

How we will use your data

We will process information about your name, contact details and our contact with you. If we need to process special category information about you (such as health information) we will tell you and explain why we need to process that information.

We will retain your information while we are working with you/your organisation. We may retain information beyond this period in order to maintain an audit trail of our activity to inform reports to our funders. Your personal details will not appear in any report, unless you have given informed consent. Case studies will be anonymised. We retain data about organisations (name, address and a key contact) we have worked with, so we are aware if we have previously worked with an organisation. Once personal information has been processed for the required purposes, we will anonymise data and keep anonymised data for monitoring and evaluation purposes. For example, we keep some information about the providers we have quality checked to enable us to conduct thematic reviews, develop best practice guidance and to feedback at a macro level. No personal data is stored or used for this purpose.

We keep personal data on computerised records and in hard copy format, in accordance with Inclusion Gloucestershire's policies and take care to store this information securely. We ensure that your details are accurate and kept up to date and securely deleted when no longer needed. Hard copy records are securely destroyed as soon as the purpose for retaining that information has ceased, for example at the end of a quality check, or when somebody is no longer a member.

Unless you have specifically consented, we will not send you marketing information and newsletters.

Sharing your data

If the service we provide for you involves sharing data with any organisation, we will inform you. We will inform you if we must share your data as we have a safeguarding concern.

How we keep your data secure

Information is kept in an on-site Windows server environment, using complex passwords. Passwords are not shared between users. We use Microsoft 365 for business which is ISO27001 compliant. Documents containing sensitive information are stored in password protected folders and documents are password protected. Only users that need to see sensitive information are given access. Sensitive information is emailed via an encrypted email. Personnel information is also stored on third party systems such as pay dashboard and BrightHR. Hard copies of sensitive information are stored in locked cabinets.

Website Cookies and Google Analytics

We ask for your consent to our use of cookies when you first visit our website. Like most others, our website uses cookies to collect information, such as about pages viewed and your journey around the website. A 'cookie' is a small data file which is placed on your computer, tablet or smart phone as you browse this site. We do not use cookies to collect or record information on your name, address, or other contact details.

You can disable cookies by changing your website browser settings to reject them. How you do this depends on which browser you use. You can find out more about managing cookies on your device at www.allaboutcookies.org.

When someone visits www.inclusiongloucestershire.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. This is so we can find out more information including how many visitors there are to the site, which pages are most used, what information visitors are searching for when they find our site, and what other websites are referring visitors to www.inclusiongloucestershire.co.uk.

This information is processed in such a way as to ensure that it does not identify any visitors to the site. We do not collect demographic (age, gender, etc.) or interest data through Google Analytics, and we do not use it for remarketing or advertising reporting purposes. User and event data (a visit to the site and what happens during the session) is retained for 14 months to enable us to report annually on our website analytics and then is automatically deleted.

If you do not want us to collect information about your visit to our website using Google Analytics you can opt out of the Analytics service by installing an add-on for your browser. This can be found at <https://tools.google.com/dlpage/gaoptout>.

Wi-Fi

We have guest Wi-Fi access available at Inclusion Gloucestershire for people who attend meetings and events at the office. When you use our Wi-Fi the router automatically collects the MAC address and device ID for your device as it allocates an IP address. This data is automatically deleted within 72 hours.

Inclusion Gloucestershire Membership database

If you use our services or like to be kept up to date with things we do, we collect personal information. We only use that information to send you information you have asked us to send you. If you change your mind you can unsubscribe at any time by contacting us at info@inclusion-glos.org.

Your Rights

The General Data Protection Regulations (GDPR) provides a number of rights for individuals:

- The right to be informed about the information we process about you
- The right of access – to see the information we process about you
- The right to rectification – if you feel that any information held is inaccurate
- The right to erasure – should you decide we should not process information about you.
- The right to restrict processing about you
- The right to data portability
- The right to object

Should you wish to exercise these rights please contact us through the following means:

- By email to info@inclusion-glos.org
- By telephone 01452 234003 and ask to speak to Business Director
- By Post, FAO Business Director, Inclusion Gloucestershire, 2 St. Michaels Court, St. Michaels Square, Gloucester, Gloucestershire GL1 1JB.

Please provide your full name and contact details, together with the nature of your request and your relationship with Inclusion Gloucestershire (e.g. former/current member of staff; trustee or other volunteer; service user; and timescales involved). We will respond within a month of receiving your request.

Making a complaint to the Information Commissioner

If you wish to make a complaint about how we use your personal data to the Information Commissioner's Office, you can contact them by visiting their website at <https://ico.org.uk/> or by *calling 0303 123 1113*.

This privacy statement will be regularly reviewed and may be updated periodically e.g. should legislation or circumstances change.

Appendix 2

Data storage process

Get informed consent to collect personal data for agreed purpose, e.g. membership form, quality check.



Store hard copy information in locked file or electronic information in a password protected folder as applicable. Only send secure information in password protected documents, via encrypted email.



Ensure only those that need access, have access/ receive information.



If information required for monitoring and evaluation – redact personal information (name, address, date of birth) and retain non-personal information (facts and figures). Do not retain any information for longer than the required purpose.



Securely delete all information when no longer required or when a request to delete is received.