

## **DATA PROTECTION POLICY**

### **1. INTRODUCTION**

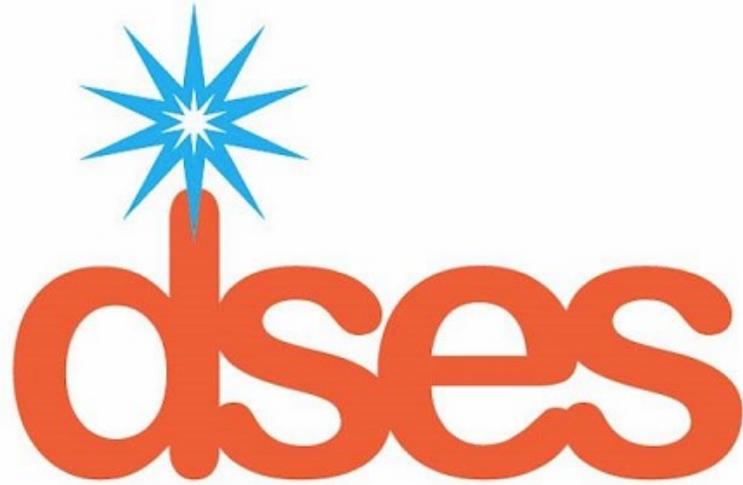
#### **1.1. Purpose of Policy**

Dementia Support East Sussex needs to collect and use information about people with whom it works in order to operate and carry out its functions. These may include members of the public, current, past and prospective employees, trustees, volunteers, service users, activity coordinators, centre managers and clients. This personal information must be handled and dealt with properly to ensure compliance with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) however it is collected, recorded and used and whether it is on paper, in computer records or recorded by other means.

#### **1.2. Data Protection Principles**

Dementia Support East Sussex regards the lawful and appropriate treatment of personal information as very important to its successful operations and essential to maintaining confidence between the charity and those with whom it works. Dementia Support East Sussex therefore, fully endorses and adheres to the Principles of the GDPR. These principles are legally enforceable. Summarised, the principles require that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further



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processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures in accordance with the rights of data subjects under the regulation.

### **1.3. Information covered by GDPR**

This policy applies to all personal data processed by Dementia Support East Sussex

The Principal shall take responsibility for Dementia Support East Sussex's ongoing compliance with this policy



## Dementia Support East Sussex

- Dementia Support East Sussex shall register with the Information Commissioner's Office as an organisation that processes personal data.

Dementia Support East Sussex holds two types of information which are covered by this policy:

### 1. Personal data

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Dementia Support East Sussex **collects the following personal data:**

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#### **Staff and Volunteers**

- Name and contact details including address and telephone number
- Name and contact details of next of kin (for emergency situations)
- Bank details

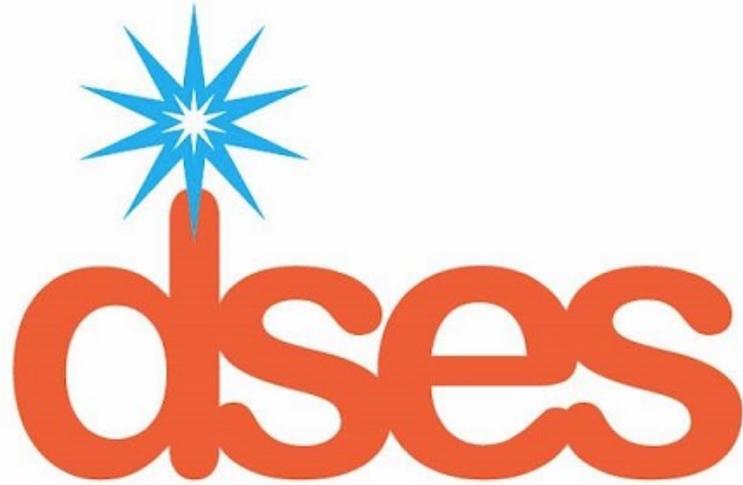
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#### **Job Applicants:**

- Name and contact details including address, e-mail address and telephone number

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#### **Trustees, volunteers, Singing tutors and Craft facilitators. Activity coordinators and centre managers**



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Name, address, e-mail, phone number

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### **Members and organisations we work with**

- Name and contact details including, phone, e-mail and address

## **2. Special categories of data**

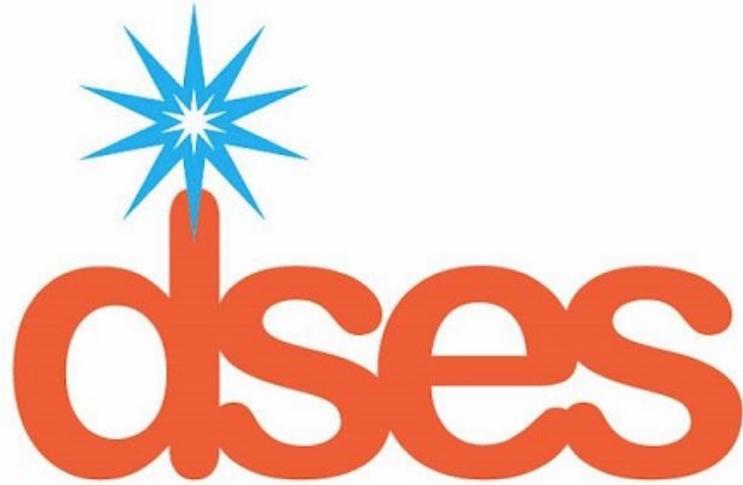
The GDPR refers to sensitive personal data as “special categories of personal data” (see Article 9). Special category data is defined as personal data consisting of information as to:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics
- health;
- sex life; or
- sexual orientation.

Dementia Support East Sussex does not collect any of the above.

## **2. POLICY STATEMENT**

Dementia Support East Sussex is fully committed to full compliance with the requirements of the General Data Protection Regulation (GDPR) (Regulation



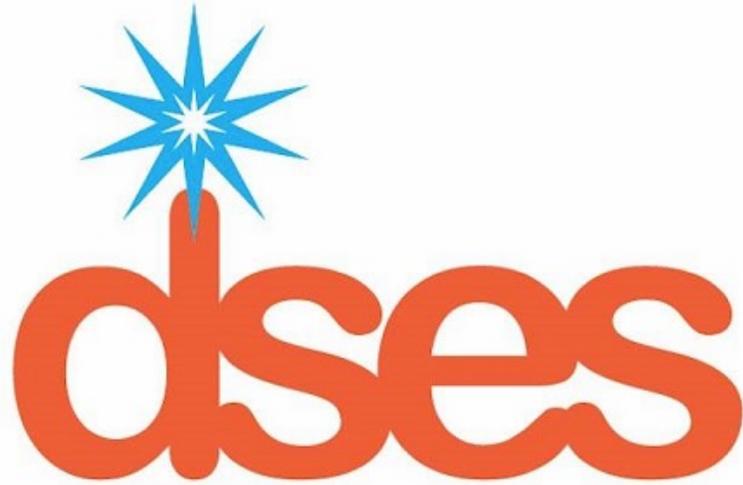
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(EU) 2016/679). Dementia Support East Sussex will, through management and use of appropriate controls, monitoring and review:

- Ensure its processing of data is lawful, fair and transparent
- Ensure that all processed data must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- Ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Take reasonable steps to ensure personal data is accurate and kept up to date.

Ensure that personal data is kept for no longer than necessary, Dementia Support East Sussex shall put in place an archiving policy for each area in which personal data is processed and review this process annually. The archiving policy shall consider what data should/must be retained, for how long, and why.

- Ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Limit access to personal data to personnel who need access and put



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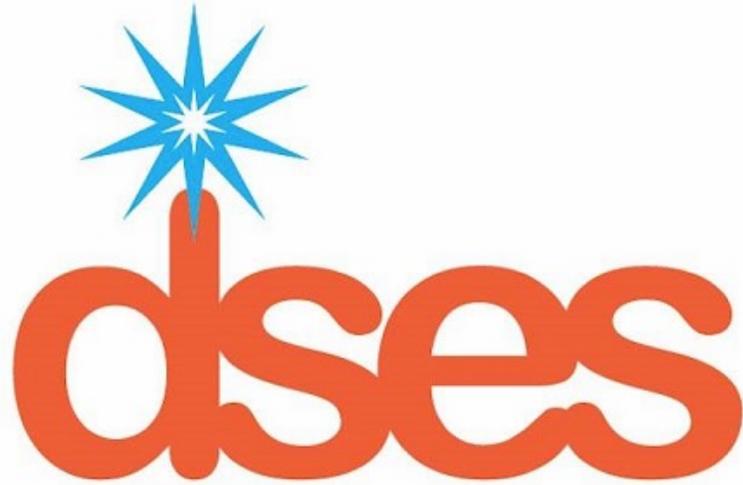
appropriate security in place to avoid unauthorised sharing of information.

- Delete personal data safely such that the data is irrecoverable.
- Put in place appropriate back-up and disaster recovery solutions.
- Ensure that there is general information made available to the public of their rights to access information; and
- Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation

These rights include:

- The right to be informed.
- The right of access to personal information.
- The right to request rectification.
- The right to request erasure.
- The right to restrict processing in certain circumstances.
- The right to data portability.
- The right to object to processing.

### 3. ROLES AND RESPONSIBILITIES



## Dementia Support East Sussex

### 4.1 Board of Trustees

The Board of Trustees has overall responsibility for ensuring that the organisation complies with its legal obligations. All trustees are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work and will additionally:

- Approve the Data Protection Policy.
- Review the Data Protection Policy annually.
- Appoint and supervise the Data Protection Lead.

### 4.2 Data Protection Lead

The Data Protection Lead will be the Principal and will have the following responsibilities:

- Brief the board on Data Protection responsibilities.
- Review data protection and related policies.
- Advise other staff on tricky data protection issues.
- Ensure that data protection induction and training take place.
- Ensure regular updating of data takes place.
- Handle subject access requests.

### 3. Staff and Volunteers

All staff and volunteers are required to read, understand and accept any policies, procedures and guidelines that relate to the personal data they may handle in the course of their work.

- All staff and volunteers will ensure personal data kept in relation to their project is regularly reviewed and updated.



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- All staff and volunteers are required to understand that the breach of this policy may be treated as a disciplinary issue.

### **4. BREACH**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Dementia Support East Sussex shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.