



# Whitechapel Mission

*Bringing hope where there is despair*



## Data Protection Policy

The Whitechapel Mission is committed to protecting and respecting the confidentiality of sensitive information relating to staff, volunteers, supporters, service users and trustees.

### Introduction

The Whitechapel Mission needs to keep certain information about our employees, volunteers, service users and other users to allow us, for example, to monitor performance, achievement, and health and safety.

To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, we must comply with the Data Protection Principles which are set out in the Data Protection Act 1998. In summary these principles state that personal data shall:

- Be obtained and processed fairly and lawfully.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for that purpose.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept safe from unauthorised access, accidental loss or destruction.

All staff who process or use personal information must ensure that they follow these principles at all times. In order to ensure that this happens, the Charity has developed this Data Protection Policy. This policy does not form part of the contract of employment for staff, but it is a condition of employment that employees will abide by the rules and policies made by the Charity from time to time. Any failures to follow the policy can therefore result in disciplinary proceedings.

### The Data Controller and the Designated Data Controllers

The Charity, as a body, is the Data Controller under the 1998 Act, and the Trustees are therefore ultimately responsible for implementation.

However, the Designated Data Controllers will deal with day to day matters.

The Charity has identified its Designated Data Controllers as:

The Director, Deputy Director, Daycentre Manager and the Assistant Daycentre Manager.

Any member of staff, trustee, centre user, supporter or other individual who considers that the Policy has not been followed in respect of personal data about himself or herself should raise the matter with the Director, in the first instance.

### Responsibilities of Staff

All staff are responsible for:

- Checking that any information that they provide to the Charity in connection with their employment is accurate and up to date.
- Informing the Charity of any changes to information that they have provided, e.g. change of address, either at the time of appointment or subsequently. The Charity cannot be held responsible for any errors unless the staff member has informed the Charity of such changes.

Since 1876, The Whitechapel Mission has been called to serve the men and women caught in the cycles of poverty, hopelessness and dependencies of many kinds, and to see their lives transformed to hope, joy and lasting productivity.

Handling all personal data (eg — supportes or service users data) with reference to this policy.

## Data Security

All staff are responsible for ensuring that:

- Any personal data that they hold is kept securely.
- Personal information is not disclosed either orally or in writing or via Web pages or by any other means, accidentally or otherwise, to any unauthorised third party.

Staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

Personal information should:

- Be deleted if not required
- Be kept in the locked filing cabinets, in the secure office, or;
- If it is computerised, be password protected both on a local hard drive and on a network drive that is regularly backed up; and
- No data is to be copied to or stored on a usb memory key or other removable storage media.

## Rights to Access Information

All staff, supporters, service users and other users are entitled to:

- Know what information the Charity holds and processes about them and why.
- Know how to gain access to it.
- Know how to keep it up to date.
- Know what the Charity is doing to comply with its obligations under the 1998 Act.

The Charity will, upon request, provide all staff, supporters and service users and other relevant users with a statement regarding the personal data held about them. This will state all the types of data the Charity holds and processes about them, and the reasons for which they are processed.

All staff, supporters, service users and other users have a right under the 1998 Act to access certain personal data being kept about them either on computer or in certain files. Any person who wishes to exercise this right should make a request in writing and submit it to the Director. The Charity will ask to see evidence of your identity, such as your passport or driving license, before disclosure of information.

The Charity may make a charge on each occasion that access is requested in order to meet the costs of providing the details of the information held.

The Charity aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days, as required by the 1998 Act.

## Retention of Data

The Charity has a duty to retain some staff, supporters and service users personal data for a period of time following their departure from the Charity, mainly for legal reasons, but also for other purposes such as being able to provide references. Different categories of data will be retained for different periods of time.

**Tony Miller**

Director

26<sup>th</sup> June 2019