

INTRODUCTION

This policy is designed to protect both the organisation and the individual from action that could be taken in the event of a breach of data protection law. All employees and volunteer leaders must abide by this policy and any failure to abide by it may result in disciplinary action being taken.

DATA PROTECTION POLICY

Transformation Centre has been committed fully to compliance with the requirements of the Data Protection Act 1998, and its amendments. The 1998 Act applies to all organisations that process data of their employees, volunteers, members, etc. as well as to others e.g. customers and clients. It sets out principles which should be followed by those who process data; it gives rights to those whose data is being processed.

From May 2018, the Europe-wide General Data Protection Regulation comes into force. Its rules are more stringent, particularly in relation to digital data and its use.

Under the General Data Protection Regulation 2018, a monetary penalty notice may be served on an organisation who breaches the regulations. This penalty notice may be imposed if there is a serious contravention of data protection principles which are likely to cause substantial damage or substantial distress.

Everyone responsible for using data has to follow strict rules called 'data protection principles' and must make sure the information is:

1. used fairly and lawfully
2. used for limited, specifically stated purposes
3. used in a way that is adequate, relevant and not excessive
4. accurate
5. kept for no longer than is absolutely necessary
6. handled according to people's data protection rights
7. kept safe and secure
8. not transferred outside the European Economic Area without adequate protection

There is stronger legal protection for more sensitive information, such as:

1. ethnic background
2. political opinions

3. religious beliefs
4. health, including sexual health
5. criminal records

Organisations that process or use personal information must ensure that they always follow these principles. Therefore, through appropriate management and strict application of criteria and controls, Transformation Centre will:

1. observe fully the conditions regarding the fair collection and use of information
2. meet its legal obligations to specify the purposes for which information is used
3. collect and process appropriate information only to the extent that it is needed to fulfil our operational needs and public benefit according to our constitution or to comply with any legal requirements
4. ensure the quality of information used
5. ensure that the information is held for no longer than is necessary
6. ensure that the rights of people about whom information is held can be fully exercised under GDPR (i.e. the right to be informed that processing is being undertaken, to access one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information)
7. take appropriate technical and organisational security measures to safeguard personal information
8. ensure that personal information is not transferred abroad without suitable safeguards

STATUS OF THIS POLICY

This policy covers all use of data within Transformation Centre. The Policy does not form part of the formal contract of employment for staff but it is a condition of employment that staff will abide by the rules and policies made by Transformation Centre. Any failure to follow the Data Protection Policy may lead to disciplinary proceedings.

DESIGNATED DATA CONTROLLER

The Designated Data Controller (**church secretary**) will deal with day-to-day matters. Any member of staff, volunteer, member, etc., or other individual who considers that the Policy has not been followed in respect of personal data about herself or himself should raise the matter with the Designated Data Controller.

STAFF/VOLUNTEER RESPONSIBILITIES

All staff and volunteers are responsible for:

1. ensuring that they are familiar with and comply with this policy

2. checking that any information that they provide to the organisation in connection with their employment/personal contact details is accurate and up to date
3. informing the organisation of any changes to information that they have provided, e.g. changes of address, either at the time of appointment or subsequently. The organisation cannot be held responsible for any errors unless the employee/volunteer has informed it of such changes

DATA SECURITY

All staff/volunteers are responsible for ensuring that:

1. any personal data that they hold is kept securely
2. 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
3. staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct. Personal information should be kept in a locked filing cabinet, drawer, or safe. If it is computerised, it should be coded, encrypted or password protected.
4. data should only be stored in such a way that it is regularly backed up, and password protected. If it is necessary to store data on a computer hard drive or on removable storage media, the file must be password protected and removable storage media kept in a locked filing cabinet, drawer, or safe. If the data is taken offsite, it is essential that media is secure. NB Password protection is not the same as Encryption.
5. paper-based sensitive material must be disposed of securely, for example, either by shredding or the use of confidential waste disposal.

SUBJECT CONSENT

In many cases, the organisation can only process personal data with the consent of the individual. In some cases, if the data is sensitive, (and to which special rules apply), express consent must be obtained. Agreement to the organisation processing some specified classes of personal data are a condition of employment for staff/recruitment of volunteers. This includes information about previous criminal convictions. Therefore, the application forms that all prospective staff/volunteers are required to complete will include a section requiring consent to process the applicant's personal data. A refusal to sign such a form will prevent the application from being processed.

SUBJECT ACCESS

An individual may request details of personal information which we hold under the Data Protection Act 1998/GDPR. If an individual would like a copy of the information held relating to them, they should write to:

TC Office, 137 Gregg Street, BT27 5AL, Lisburn

The requested information will be provided within 1 month.

If an employee/volunteer/member, etc.. believes that any information held relating to him or her is incorrect or incomplete, then they should write to or email info@transformation.cc as soon as possible, at the above address. The organisation will promptly correct any information found to be incorrect.

In some situations, information can be withheld, for example if it involves:

- the prevention, detection or investigation of a criminal offence
- national security or the armed forces
- the assessment or collection of tax

The provisions of the Data Protection Act to 19 February 2017 can be found at:

<http://www.legislation.gov.uk/UKPGA/1998/29/contents>