

Leeds Weekend Care Association

Data Protection Policy

Purpose:

The purpose of this document is to outline:

- How Leeds Weekend Care Association (LWCA) will ensure compliance with the UK GDPR and Data Protection Act 2018.
- Explain the roles and responsibilities relevant to internal compliance.
- How compliance with this policy will be monitored.

Introduction

This policy provides a framework for ensuring that LWCA meets its obligations under the UK General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018 (DPA 18).

- LWCA complies with data protection legislation guided by the six data protection principles.

In summary, they require that personal data is:

- processed fairly, lawfully and in a transparent manner.
- used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
- adequate, relevant, and limited to what is necessary.
- accurate and, where necessary, up to date.
- not kept for longer than necessary; and
- kept safe and secure.

In addition, the accountability principle requires us to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data. Failure to do so, can result in breach of legislation, reputational damage, or financial implications due to fines. To meet our obligations, we put in place appropriate and effective measures to make sure we comply with data protection law.

Our staff have access to training and several policies, operational procedures, and guidance to give them appropriate direction on the application of the data protection legislation, such as;

- Retention and Disposal Schedule
- Cyber Security training
- Privacy Notice

Information Covered by Data Protection Legislation

The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person.

Pseudonymised personal data is covered by the legislation, however anonymised data is not regulated by the UK GDPR or DPA 18, providing the anonymisation has not been done in a reversible way.

Some personal data is more sensitive and is afforded more protection, this is information related to:

- Race or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;

- Biometric ID data;
- Health data;
- Sexual life and/or sexual orientation; and
- Criminal data (convictions and offences)

Our Commitment

LWCA is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about users of our services, staff or those who work or interact with us.

Privacy Notices - we publish a privacy notice on our website and provide timely notices where this is required. We track and make available any changes in our privacy notice.

Training – the Office Manager is required to attend data protection/Cyber security training module as part of their induction, and this is to be refreshed 3-yearly.

Breaches - we consider personal data breach incidents and have a reporting mechanism that is communicated to all staff. We assess whether we need to report breaches to the ICO. We take appropriate action to make data subjects aware if needed.

Information Rights - we have clear processes to handle Subject Access Requests (SAR) and other information rights requests. The process is that any client or client's representative can make a request for information either in writing or verbally. We will aim to satisfy the request without delay and within one month of the request being made.

Data Protection by Design and Default - we have a procedure to assess processing of personal data perceived to be high risk, that needs a Data Protection Impact Assessment (DPIA) carried out, and processes to assist staff in ensuring compliance and privacy by design is integral part to any service we offer.

Policies and Procedures - we produce policies and guidance on information management and compliance that we communicate to staff.

Roles and Responsibilities

We have a Data Protection Officer (DPO), the Office Manager, who is primarily responsible for advising on and assessing our compliance with the DPA and UK GDPR and making recommendations to improve compliance.

Monitoring

Compliance with this policy will be monitored via the LWCA DPO and the board of trustees.

Further information

If members of the public/or stakeholders have specific questions about information security and data protection in relation to LWCA please contact the Office Manager.

Office Manager

Email: office@lwca.co.uk

Mobile: 07508 240 555

The Information Commissioner's website (www.ico.gov.uk) is another source of useful information.

Policy version information

<i>Policy created or last reviewed</i>	<i>October 2023</i>
<i>Reviewed by</i>	<i>Liz Sunderland / Lisa Sheader</i>
<i>Policy approved by Board</i>	<i>December 2023</i>
<i>Policy due for review (3 yearly)</i>	<i>October 2026</i>

Registered Charity Number 1077162

Company Limited by Guarantee, number 3827833
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32 Roxholme Grove, Chapel Allerton, Leeds LS7 4JJ

Appendix - Data Retention Policy

Type of information	Data subject	Collection method	Storage method	Security measures	Retention period	Person Responsible
Personnel files	Staff/Volunteers	Paper (shredded after transfer to electronic)	Paper or Electronic. Paper copies kept in locked filling cabinet in locked office.	777 Networks and Endpoint Security	6 years after employment ceases.	Data Protection Officer (Office Manager)
Client Files	Service users	Paper (shredded after transfer to electronic)	Paper or Electronic. Paper copies kept in locked filling cabinet in locked office and Client files at the play scheme in locked room.	777 Networks and Endpoint Security	Until the service user reaches the age of 21 years.	Data Protection Officer (Office Manager)

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