



DATA PROTECTION POLICY

This policy was approved on 11th June 2018 by the Trustees
Reviewed May 2019, June 2020, June 2021 & June 2022 with no changes made

NEXT REVIEW DATE: June 2024

Signature: (Chair of Trustees)

Print Name:..... Date:

Signature: (Director)

Print Name:..... Date:

1	Introduction
1.1	The Souster Youth Trust (the Trust) recognises it's responsibility to comply with current data protection legislation, including the General Data Protection Regulation (GDPR)
1.2	This policy sets out the requirements to ensure compliance with laws and regulations applicable to the collection, storage, use, processing and transfer of personal data. It applies to trustees, staff and volunteers, and to third parties who receive personal data from the Trust, have access to personal data collected or processed by the Trust, or who provide data to the Trust.
1.3	Personal data' means any information relating to an identified or identifiable natural person ('a data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
2	Responsibility
2.1	The Board of Trustees have overall responsibility for compliance with data protection law and regulations, and have designated one of their number to have lead responsibility
2.2	Day-to-day responsibility for compliance rests with the Office Manager, who reports to the Director
3	Data Protection Principles
3.1	Personal data shall be: -
	3.1.1 processed lawfully, fairly and in a transparent manner in relation to the data subject;
	3.1.2 collected for specified, explicit and legitimate purposes and processed only for those purposes;
	3.1.3 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
	3.1.4 accurate and, where necessary, kept up-to-date; every reasonable step will 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;
	3.1.5 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;
	3.1.6 processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing or access and against accidental loss, destruction or damage, using appropriate technical or organisational measures
4	Personal Data held
4.1	The Trust documents the personal data it holds in a Data Audit, recording it's source, the bases on which it is processed, how it is secured and with whom it is shared
4.2	The Trust will review the Data Audit from time-to-time in order to ensure compliance
4.3	Where the Trust processes "special categories" of personal data (as defined by Article 9(1) of the GDPR) access to such data is restricted to those members of staff who need such access for the performance of their duties

5	Communicating Privacy Information
5.1	The Trust will provide such privacy notices as are necessary in order to ensure data subjects are aware: -
5.1.1	what it is going to do with their information;
5.1.2	who it will be shared with;
5.1.3	of the lawful basis on which the data is processed;
5.1.4	of the periods for which data is retained;
5.1.5	their right to complain to the Information Commissioner's Office if they are dissatisfied with the way the data is being handled
6	Consent
6.1	The Trust will ensure that: -
6.1.1	data subjects are provided with a clear explanation of the processing to which they are consenting;
6.1.2	the consent mechanism is genuinely of a voluntary and "opt-in" nature;
6.1.3	data subjects are permitted to withdraw their consent easily;
6.1.4	consent does not rely on silence or inactivity (e.g. pre-ticked boxes do not constitute valid consent);
6.1.5	wherever it relies on the consent of EU employees or volunteers as a lawful basis for processing personal data, it will consider whether such consent is freely given
7	Data Subject Rights
7.1	The Trust recognises that the GDPR provides rights for data subjects, in particular: -
7.1.1	to be informed of information held about them;
7.1.2	to access information held on them;
7.1.3	to rectify the information held on them;
7.1.4	to erase information held on them;
7.1.5	to restrict the processing of the personal data;
7.1.6	to data portability
7.1.7	to object to the personal data held about them;
7.1.8	not to be subject to automated decision-making including profiling

8	Subject Access Requests
8.1	The Trust will respond to Subject Access Requests in line with the required timescale (i.e. one month)
8.2	The Trust will consider the nature of requests made and respond accordingly
8.3	The Trust may refuse or charge for requests that are manifestly unfounded or excessive, informing the individual why and advising that they have the right to consult the Information Commissioner's Office
9	Data Breaches
9.1	The Trust will ensure that it has procedures in place to detect, report and investigate a personal data breach
10	Policy Review
10.1	This policy will be reviewed an annual intervals or such or when necessitated by legislation