

Data Protection Policy.

The Leonardo Trust needs to keep certain information on its Employees, Volunteers, Service Users (clients) and Trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

The Policy covers employed staff, Volunteers, Service Users (Clients) , Donors and Trustees

Definitions

In line with the Data Protection Act 1998 principles, The Leonardo Trust will ensure that personal data will;

Be obtained fairly and lawfully and shall not be processed unless certain conditions are met.

Be obtained for a specific and lawful purpose

Be adequate, relevant but not excessive

Not be held for longer than necessary

Be processed in accordance with the rights of data subjects

Be subject to appropriate security measures

Not be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all personal data it processes, i.e.

- **Accountability** : those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility**: Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent**: The collection and use of personal data must be fair and lawful and in accordance with DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose the data subject's consent should be explicitly obtained. (**NOTE : see our Privacy Policy and commitment to an 'Opt In Policy**)
- **Access**: Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.
- **Stewardship**: Those collecting personal data have a duty of care to protect this data throughout the data life span.

Type of Information processed

The Leonardo Trust processes the following personal information:

In the case of employed staff, we hold personal data regarding names and addresses, telephone numbers and email addresses, dates of birth, dates of

service, together with staff contracts and details relating to and enabling the payment of salaries, Tax and N. I and, pension contributions.

In the case of volunteers, we would hold only their names and addresses, telephone numbers and email addresses where applicable.

In the case of Service users (Clients) we hold encrypted computer based records of their names and addresses, telephone numbers and where applicable email addresses these records include details of any grant awarded to them. We also hold such information as they have provided on their paper application form, these paper records are held for two years and then securely destroyed.

In the case of Donors we hold encrypted computer and securely stored paper records of the donation made, when and by whom in line with accounting practices.

In the case of Trustees, we hold their names and addresses, Dates of Birth, Telephone numbers, emails addresses and dates of service in the role of Trustee, we also hold records of any professional qualifications and copies of their Eligibility to serve as Trustee.

Personal information is kept in the following forms:

Encrypted Computer Files

Paper files

Groups of people within the organisation who will process personal information:

Authorised (by the Trustee Board) staff members only .

Notification

The Leonardo Trust is not under requirement as a not for profit organisation to registered with the Information Commissioners Office (ICO).

The name of the Data Controller within the Leonardo Trust is Operations Manager Andrew Bryant

Responsibilities

Under the Data Protection Guardianship Code, overall responsibility to personal data in a not for profit organisation rests with the governing body. In the case of The Leonardo Trust this is the Board of Trustees.

The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:

- Understanding and communicating obligations under the Act
- Identifying potential problem areas of risk
- Producing clear and effective procedures

All employed staff who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breaches of this policy will result in disciplinary proceedings.

Policy Implementation

To meet our responsibilities the authorised persons with access to data will:

- Ensure any personal data is collected in a fair and lawful way.
- Explain why it is needed at the start
- Ensure that only the minimum amount of information needed is collected and used.
- Ensure the information used is up to date and accurate
- Review the length of time information is held

- Ensure it is kept safely
- Ensure the rights people have in relation to their personal data can be exercised .

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about the handling of their personal information, whether a member of staff , volunteer or Service user (client) knows how to do so.
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

Training

Training and awareness raising about The Data Protection Act and how it is followed in this organisation will take the following forms:

On Induction of any new members of staff a full explanation in detail of The Leonardo Trust Policy will be given .

General training/awareness raising: An Annual review of the Policy by the Trustee Board together with applicable staff will take place.

Gathering and Checking Information

Before personal Information is collected we will consider:

What information is absolutely necessary to meet our purposes, this will normally mean basic information relating to names and addresses, telephone numbers and where applicable email addresses. However, in the case of service users (Clients) some brief details relating to the reason they need access to the service will need to be collected . This information will have

been provided by the service user themselves when completing an application form.

We will inform people whose information is gathered about the following,

What the information is for.

We will take the following measures to try to ensure that personal information kept is accurate:

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

Data Security

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- Computerised records are stored on an encrypted system and access is only available to authorised staff members. The computers also have password access.
- Staff are aware that as part of this policy they are not allowed to download encrypted information for removal off site.
- Paper files are kept under lock and key and only authorised staff have access to the keys . The building in which files and Computers are kept are alarmed.
- Any unauthorised disclosure of personal data to a third party by an employee will result in disciplinary proceedings.
- Back up files stored on a separate hard drive are kept under lock and key and are not taken of site.

Subject Access Requests

Anyone whose personal information we process has the right to know:

- What information we hold about them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to Andrew Bryant, 5 Dunyeats Road, Broadstone, BH18 8AA, 01202 698325, andy@leonardotrust.org

The following information will be required before access is granted:

- Reason for requiring access

We may also require proof of identity before access is granted. The following forms of ID will be required:

- One of the following, Copy of Photo page of Passport, Copy of Photo section of UK Driving Licence Birth Certificate.

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request.

Review

This Data Protection Policy will be reviewed at intervals of 12 months to ensure it remains up to date and compliant with the law. Earlier reviews will take place if changes within the organisation or legislation should require it.

Policy adopted by The Trustee Board on December 15th 2017

Name (print):

Signed:

Date: