

# Data Protection Policy

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## **Policy Statement**

Youth Ngage collects and uses information about people with whom it communicates only.

This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the Data Protection Act 1998 and in line with GDPR..

Youth Ngage regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain confidence between those with whom it deals.

To this end Youth Ngage fully endorses and adheres to the Principles of Data Protection, as set out in the Data Protection Act 1998. CCT is committed to processing data in accordance with its responsibilities under the GDPR

## **Purpose**

The purpose of this policy is to ensure that the staff, volunteers and trustees of Youth Ngage are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

Failure to adhere to the Data Protection Act 1998 is unlawful and could result in legal action being taken against Youth Ngage or its staff, volunteers or trustees.

## **Principles**

The Data Protection Act 1998 regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerised



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records as well as manual filing systems and card indexes. Data users must comply with the data protection principles of good practice which underpin the Act. 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, Youth Ngage follows the eight Data Protection Principles outlined in the Data Protection Act 1998, which are summarised below:

- I. Personal data will be processed fairly and lawfully
- II. Data will only be collected and used for specified purposes
- III. Data will be adequate, relevant and not excessive
- IV. Data will be accurate and up to date
- V. Data will not be held any longer than necessary
- VI. Data subject's rights will be respected
- VII. Data will be kept safe from unauthorised access, accidental loss or damage
- VIII. Data will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

The principles apply to "personal data" which is information held on computer or in manual filing systems from which they are identifiable.

Youth Ngage employees, volunteers and trustees who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

## **Procedures**

The following procedures have been developed in order to ensure that Youth Ngage meets its responsibilities in terms of Data Protection. For the purposes of these procedures data collected, stored and used by Youth Ngage falls into 2 broad categories:

1. Youth Ngage internal data records; Staff, volunteers and trustees
  
2. Youth Ngage external data records; Members, customers, clients.

Youth Ngage as a body is a DATA CONTROLLER under the Act, and the Executive Committee is ultimately responsible for the policy's implementation.



## **Internal Data Records**

### **Purposes**

Youth Ngage obtains personal data (names, addresses, phone numbers, email addresses), application forms, and references and in some cases other documents from staff, volunteers and trustees. This data is stored and processed for the following purposes:

- Recruitment, meetings, trips, events
- Equal Opportunities monitoring
- Volunteering opportunities
- To distribute relevant organisational material e.g. meeting papers
- Payroll

### **Access**

The contact details of staff, volunteers and trustees will only be made available to other staff, Volunteers and Trustees. Any other information supplied on application will be kept in a secure filing cabinet or in the secured staff folder online and should not be accessed except for the day to day running of the organisation.

Contact details of participants, staff, volunteers and trustees will not be passed on to anyone outside the organisation without their explicit consent. A copy of staff, volunteer, trustee emergency contact details will be kept in the Emergency File for Health and Safety purposes to be used in emergency situations e.g. fire/ bomb evacuations.

Staff, volunteers and trustees will be supplied with a copy of their personal data held by the Youth Ngage if a request is made. All confidential post must be opened by the addressee only.

### **Storage**

Personal data can be kept in paper-based systems and on a password-protected computer system. Every effort is made to ensure that paper-based data are stored in organised and secure systems. Youth Ngage operates a clear desk policy at all times.



## **External Data Records**

### **Purposes**

Youth Ngage obtains personal data (such as names, addresses, email address, date of birth and National Insurance Number and phone numbers) from members/clients. This data is obtained, stored and processed solely to assist staff and volunteers in the efficient running of services. Personal details supplied are only used to send material that is potentially useful and account for Youth Ngage end users. Most of this information is stored on the organisation's database.

Youth Ngage obtains personal data and information from clients and members in order to provide services. This data is stored and processed only for the purposes outlined in the agreement and service specification signed by the client/ member.

### **Consent**

Personal data is collected over the phone and using other methods such as e-mail. During this initial contact, the data owner is given an explanation of how this information will be used. Written consent is not requested as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation, in which case the Manager will discuss and agree disclosure with the Director. Contact details held on the organisation's database may be made available to groups/ individuals outside of the organisation. Individuals are made aware of when their details are being collected for the database and their verbal or written consent is requested.

### **Accuracy**

Youth Ngage will take reasonable steps to keep personal data up to date and accurate.



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Personal data will be stored for as long as the data owner/ client/ member use our services and normally longer. Where an individual ceases to use our services and it is not deemed appropriate to keep their records, their records will be destroyed according to the schedule in Appendix B. However, unless we are specifically asked by an individual to destroy their details, we will normally keep them on file for future reference.

If a request is received from an organisation/ individual to destroy their records, we will remove their details from the database and request that all staff holding paper or electronic details for the organisation destroy them. This work will be carried out by the Information Officer. This procedure applies if Youth Ngage is informed that an organisation ceases to exist.

### **Use of Photographs**

Where practicable, Youth Ngage will seek consent of members/ individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisation's website or in the Newsletter.

### **Disclosure and Barring Services (DBS)**

Youth Ngage will act in accordance with the DBS's code of practice. Copies of disclosures are kept for no longer than is required. In most cases this is no longer than 6 months in accordance with the DBS Code of Practice. There may be circumstance where it is deemed appropriate to exceed this limit e.g. in the case of disputes.

### **Responsibilities of staff, volunteers and trustees**

During the course of their duties with Youth Ngage, staff, volunteers and trustees will be dealing with information such as names/addresses/phone numbers/e-mail addresses of members/clients/volunteers. They may be told or overhear sensitive information while working for Youth Ngage. The Data Protection Act (1988) gives specific guidance on how this information should be dealt with. In short to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person



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unlawfully. Staff, paid or unpaid must abide by this policy. To help staff, volunteers, trustees meet the terms of the Data Protection Act; the attached Data Protection/Confidentiality statement has been produced. Staff, volunteers and trustees are asked to read and sign this statement to say that they have understood their responsibilities as part of the induction programme.

## **Compliance**

Compliance with the Act is the responsibility of all staff, paid or unpaid. Youth Ngage will regard any unlawful breach of any provision of the Act by any staff, paid or unpaid, as a serious matter which will result in disciplinary action. Any employee who breaches this policy statement will be dealt with under the disciplinary procedure which may result in dismissal for gross misconduct. Any such breach could also lead to criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy statement should in the first instance be referred to the line manager.

## **Retention of Data**

No documents will be stored for longer than is necessary. For guidelines on retention periods see the Data Retention Schedule.

All documents containing personal data will be disposed of securely in accordance with the Data Protection principles.

<b>Update</b>	04 April 2022
<b>Responsible Person</b>	Yetunde Adeola
<b>Date due for update</b>	03 April 2023