



Data Protection Policy

PURPOSE

The purpose of this policy is to explain our approach to ensuring that we comply with the Data Protection Act (1998) when we collect, process, and store the personal data that we need in order to carry out our business.

DATA PROTECTION PRINCIPLES

- Lawfulness, fairness, and transparency.
- Purpose limitation. • Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality (security)
- Accountability.

Gloucester Street Community Centre follow these principles in accordance with the GDPR in the following way.

All service users, visitors, volunteers, and employees' personal data shall be:

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency')
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation')
- (c) adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- (d) accurate and, where necessary, kept up to date; every reasonable step must 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 ('accuracy')
- (e) 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss,

destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."

GSCC will comply with all statutory requirements of the Data Protection Act 1998 and General Data Protection Regulations 2018 (GDPR) by registering all personal data held on its computer and/or related electronic equipment and by taking all reasonable steps to ensure the accuracy and confidentiality of such information.

We also ensure we protect individuals' rights concerning information about them held on our computer system. Anyone processing personal data must comply with the eight principles of good practice. Data must be:

- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant, and not excessive
- accurate
- not kept longer than necessary
- processed in accordance with the data subject's rights
- secure
- not transferred to countries without adequate protection

Employees can request access to the information held on them by the Company. All requests by employees to gain access to their personnel records should be made in writing. There is no charge for this service. This access also applies to all services users, volunteers, members, and visitors to the centre.

PROCESSES

- **The right to be informed.** We shall collect data about members, employees, all service users, as well as the children and their parents who are a part of our breakfast and After School Clubs through our application forms. The purpose of this is to ensure that immediate family, parents, or legal guardians can be contacted in the event of an accident or emergency. This data may be shared with a staff member (Tutors or Childcare Coordinators) or the child's school. The retention period of this data will be seven (7) years.
- **The right to access.** Individuals have the right to access their personal data and a request to do so can be done in writing. We shall respond within one (1) month.
- **The right to rectification.** Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete. A request for rectification should be submitted in writing and we shall respond to this request within one (1) month.
- **The right to erasure.** A right for individuals to have personal data erased also known as "the right to be forgotten". This right is not absolute and only applies in certain circumstances, but a request for erasure can be made in writing. We shall respond within one (1) month to this request.
- **The right to restrict processing.** Individuals have the right to request the restriction or suppression of their personal data. When processing is restricted, we will only store your data and not use it. This request for restriction can be made in writing. We shall respond within one (1) month to this request.

Changes in Personal Information for Employment Purposes

It is important that our records are correct, as inaccurate, or out of date information may affect your salary or cause difficulties in situations where contact is required for emergencies. You

must notify your Line Manager immediately of all changes in the following personal information:

- Name
- Home address
- Telephone number
- Bank account details
- Examinations passed/qualifications gained
- Emergency contact
- Driving licence penalties (if you are required to drive on Company business)
- Criminal charge, caution, or conviction
- Conflict, or potential conflict of interest

Personal data on employees is held in accordance with the provisions of the Company's Data Protection Policy.

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Policy approved by:	Anthony Grant
Position:	Chair
Date:	1 September 2021

