

## **Data protection policy**

Community Southwark collects and uses information about members and other organisations and individuals who we come into contact with as we carry out our work. This information must be collected and dealt with appropriately– whether on paper, electronically, or recorded on other material - and there are safeguards to ensure this under the Data Protection Act 1998.

### **Data collection**

Community Southwark will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form

When collecting data, Community Southwark will ensure that the Individual/Service User:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed and will be disposed of appropriately.

It is Community Southwark's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

### **Data access and disclosure**

All Individuals/Service Users have the right to access the information we hold about them. Community Southwark will also take reasonable steps to ensure that this

information is kept up to date by asking data subjects whether there have been any changes.

Community Southwark will not share data with other organisations. The only circumstances where Community Southwark can disclose data without the data subject's consent are where the data subject has already made the information public.

In addition Community Southwark is committed to:

- meeting our legal obligations as laid down by the [Data Protection Act 1998](#)
- ensuring that data is collected and used fairly and lawfully
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- observe fully conditions regarding the fair collection and use of information;
- collect and process appropriate information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements
- ensuring the quality of information used
- ensuring that the information is held for no longer than is necessary
- ensuring that the rights of people about whom information is held can be fully exercised under the Act (i.e. the right to be informed that processing is being undertaken, to access one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information)
- taking appropriate technical and organisational security measures to safeguard personal information
- ensuring that personal information is not transferred abroad without suitable safeguards.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

### **Data protection principles**

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
4. Personal data shall be accurate and, where necessary, kept up to date
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes

6. Personal data shall be processed in accordance with the rights of data subjects under the [Data Protection Act 1998](#)
7. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

In case of any queries or questions in relation to this policy please contact the Chief Executive Officer.

Signed:



Position: CEO

Date: May 2014

Review Date: May 2015