THE ASSOCIATION OF TEESDALE DAY CLUBS Procedure Number P11-1 Issue 02

Confidentiality/Data Protection Procedure

1. PURPOSE

This procedure exists to ensure the Association of Teesdale Day Clubs (ATDC) complies with any legal requirements and the principles of the General Data Protection Regulations (GDPR) and the Confidentiality and Data Protection Policy number 11.

2. APPLICATION

This procedure must be followed by all staff and trustees.

3. PROCEDURE

3.1 **Data Collection**

- Contact details need to be held for all people involved with the Association.
- Form F11-1 will be provided by the administrator for completion by members and volunteers.
- The ATDC privacy notice is available on the ATDC web site and copies will be held at each venue and will be available on request.
- Staff and trustees will provide all information necessary to ensure that the Association can comply with all legal requirements.

3.2 Data storage, handling and management

- All hardcopies of members, volunteers and staff information will be stored securely in non-portable, locked cabinets when not in use.
- Data will be held on a secure remote server which is password protected and accessed from computers located in the Association's office or Association laptops being used by staff when working from home.
- The server can only be accessed by staff allocated to office roles, and data handling tasks are allocated and managed by the Manager to ensure data is only accessed and handled on a 'need to know' basis.
- From time to time, some data may be accessed by key named Trustees, to ensure smooth continuous business operations.
- When accessing the remote server from home, staff and trustees will ensure that
 modems are password protected and secure, and ensure that firewall, malware
 and virus protection is up to date.
- All personal information will be updated as appropriate to ensure accuracy.
- Sensitive data, for example DBS certificates and on-line police checks, will be handled by allocated staff only and DBS certificates or on-line check information will be retained only until any recruitment, disputes or complaints are managed, completed or resolved. DBS certificates or on-line check information will not be retained longer than necessary and will be destroyed immediately by shredding and disposing as confidential waste.

THE ASSOCIATION OF TEESDALE DAY CLUBS Procedure Number P11-1 Issue 02

- A log of completed DBS checks will be retained to evidence safer recruitment and safeguarding procedures have been followed. The log document will be password protected and will only contain minimal necessary data.
- All information held by club leaders must be kept in a closed folder in a secure cupboard, and only used on site at a club or when there is a clear need for the member or volunteer to be contacted directly.
- When contacting a member or volunteer directly, staff should take every
 precaution to ensure that personal data cannot be accessed by members of their
 family or friends, by password, pass-number or fingerprint protection of devices.

3.3 **Data Sharing**

- To ensure safe and effective provision of its services the Association may disclose relevant data to club leaders, cooks, trustees and taxi drivers. In the event of medical emergencies this information may be passed onto the Emergency Service personnel.
- On very rare occasions, and only when there is a clear reason to do so, information may need to be shared with the local authority when someone is at risk of harm, or when someone has been hurt. All information shared for safeguarding reasons must be handled and managed with strict adherence to the Safeguarding policies and procedures.
- Lunch club leaders will be provided only with relevant personal information about members and volunteers to ensure members' safety, and smooth running of the club.
- No information will be passed to a third party who does not have a legitimate reason to see or hold that data.
- Data protection policies and procedures will be available on the web site and will be provided to all staff.
- Stored data must be reviewed annually, and information no longer needed must be shredded or deleted.

Reviewed and approved by F&GP Committee on 20th May 2021 Review due date: 20th May 2024