



## Data Protection Policy

This policy is intended to detail how Sussex Against Bullying collects, records and stores information in accordance with the Data Protection Act. Sussex Against Bullying holds personal information on organisations, staff, volunteers and service users. They seek to comply with both the letter and the spirit of the act.

### 1. Rights of the individual

- (a) The data protection act is based on the right of the individual (the Data Subject) to know what information is being held about them, and how the information will be used. The Act sets out principles to ensure that personal data is:
- processed fairly and lawfully
  - obtained only for specified purposes
  - relevant to the purposes for which it is processed
  - accurate and kept up to date
  - not kept for longer than is necessary
  - processed according to the rights of the Data Subject under the Act
  - protected against unauthorised processing, accidental loss or damage
  - not transferred to areas outside of the European Union (including via websites)

### 2. Information collection

- (a) Information relating to a member of staff, volunteer or service user will be obtained if relevant to the organisation.
- (b) Information will be verified with the subject where possible to ensure accuracy.
- (c) Personal information will be clearly marked as confidential.
- (d) Information will be shared with Sussex Against Bullying via the contact form, volunteers and 'refer a young person form' via our website. By entering the information onto these forms the inputter agrees that this information can be shared with appropriate agencies if there is a safeguarding concern.

### 3. Information storage

- (a) Staff and volunteer personal records will be kept within Sussex Against Bullying in accordance with its procedures.
- (b) Sussex Against Bullying staff and volunteers in the course of their duty do not have access to information on other staff or volunteers.
- (c) Information held on written documentation will be stored within a lockable location. Information held electronically will be within a password protected storage facility.
- (d) Information held on our personal data matrix will be reviewed annually to ensure it is up to date and relevant.

- (e) Information no longer relevant or required will be securely deleted from electronic storage and paper documentation securely disposed of.
- (f) We do everything in our power to ensure that our website is secure and no unauthorised person/persons are able to access sensitive information. We have added an SSL certificate on our website which puts added protection and in addition an Anti-hacking/security software on the website.

#### **4. Access to information**

- (a) Staff and volunteer information may be accessed in the case of emergency by another member of staff or for organisational need by the project manager, founder or trustees.
- (b) Staff and volunteers have the right to see the information held on them by Sussex Against Bullying. Requests should be in writing to the founder and Sussex Against Bullying will provide a copy of the information within two weeks of receiving the request. No charge is made.
- (c) Information about individuals will not be disclosed to any third party outside of Sussex Against Bullying without the permission of the individual.
- (d) Where photographs of staff and/or volunteers are used to publicise or promote the organisation, permission will be sought from individuals and the photograph used for a specified length of time.
- (e) We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (eg Police, child protective services, etc).
- (f) If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.
- (g) Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, and to manage our payroll and accounts. Any such third parties comply with the strict data protection regulations of the GDPR.

#### **5. GDPR**

- (a) Sussex Against Bullying complies with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.
- (b) We are a registered body with the Information commissioner's office and our registration number is ZA267962.

**Review date: 7<sup>th</sup> August 2019**  
**Reviewing person: Benjamin Checkley**

Approved: 28<sup>th</sup> August 2018