

Data Security & GDPR – Staff & Volunteers

Please read this internal policy alongside our public policy '**GDPR Our privacy policy and your data**' so that you fully understand how we work to keep clients data safe/secure.

For the purposes of this policy the word 'client' has been used to mean any adult, child or young person who is accessing our services, activities, advice or general signposting.

How staff/volunteers should work to keep data secure:

1. Important to Note:

- a. We NEVER collect data for marketing
- b. We NEVER share data for marketing
- c. We DO allow clients to subscribe to our mailing list for RELEVANT information and Newsletters only

2. Collecting Data

- a. Enquiries via phone, email, electronic messaging or in person
 - i. Collect ESSENTIAL data only and record online within One Drive or via the Email system which is secure and password protected
 - ii. If you are emailing a 3rd party about a client (with the clients consent only or in a safeguarding capacity) please anonymise information and use INITIALS only to identify any client or child
 - iii. If you do jot information down it must be destroyed securely (given to Jayne to dispose of via GDPR certified destruction)
- b. Safeguarding / Incident or First Aid reporting
 - i. All safeguarding or incident or first aid reporting is to be recorded online using the secure Forms online that are password protected and only accessed by minimal essential users
 - ii. Please alert Rachael if you have recorded a safeguarding concern or incident report or first aid report by Whatsapp (do NOT use full names)
- c. Sign up for activities / events
 - i. When a client signs up for an activity or event (for themselves or their child), the sign up form is online and kept secure and password protected
 - ii. The data is viewed via Forms or via a Spreadsheet. Relevant data can be moved to Activity Registers for each event/activity (this includes emergency contact details and DOB).
 - iii. Activity Registers should NOT be printed but access online only
 - iv. If a Register is printed, please pass this to Jayne to be disposed of via GDPR certified destruction
 - v. Be mindful that it is possible to download copies of Registers to your device – please ensure that these are not downloaded or DELETED and not held on any personal device

3. Storage of Data/Use of equipment (security)

- a. Ensure that you are using a secure device to access any data
 - i. An ASDFH device that is not shared with anybody else in your household and which is also password or fingerprint protected
 - ii. A personal device that is password or fingerprint protected and nobody else in your household could access or view the data
 - iii. Do NOT leave any confidential data on a phone or laptop where it can be viewed if another person borrowed your device
- b. Employee/Volunteer records are held within a secure online Vault which is password protected and only accessible to those with security to view
 - i. The Vault is owned and controlled by Maria Land Accountancy (who controls our Payroll and Expenses)
- c. Zoom for meetings
 - i. Zoom automatically downloads any 'chat' from meetings into a file on the host or co-hosts laptop/device
 - ii. At the end of any meeting please check the folder (it will be under a Zoom folder) and delete all chats
 - iii. If you feel that information needs to be saved for safeguarding purposes then please email it to Jayne or Rachael who will ensure that it is put into a secure folder on One Drive
- d. Access Data Requests
 - i. We could get contacted by a client for an Access Data Request to share with them any and all information we hold on them
 - ii. For this reason we hold data in very few places so that data is easy to obtain for any one client
 - iii. For this reason, please be considerate about how you word any information you may record about a client as this could be viewed by that person at any time

4. Disposal of Data

- a. Any hard copies of data should be destroyed and a GDPR certificate obtained
- b. We currently use Stream Shredding in Camberley
- c. Certificates are scanned and held in a folder online for future reference