

DATA PROTECTION POLICY

Ratified by the Executive Committee: May 2018

Cambridge Student
Community Action

Introduction

Cambridge Student Community Action (SCA) holds personal data about our staff, volunteers, clients, trustees, suppliers and other individuals for the business purposes defined below.

This policy:

- Outlines how we seek to protect personal data.
- Ensures staff understand the rules governing the use of personal data.
- Ensures staff treat sensitively and appropriately the data to which they have access and are required to process as part of their role.
- Requires staff to ensure that the Data Protection Officer (DPO) is consulted to address any relevant compliance issues before significant new data processing activity begins.

Definitions

Business Purposes	<p>For a more detailed report on the specific data we collect for each of our activities, please refer to our Privacy Notice located in appendix I of this document.</p> <p>Legitimate business purposes for which we may use your personal data include, but are not limited to:</p> <ul style="list-style-type: none">• Facilitating volunteering opportunities• Day-to-day operations of the charity• Marketing our business• Improving services• Checking references• Ensuring safe working practices• Recording transactions• Training and quality control• Ensuring the confidentiality of commercially sensitive information• Safeguarding vetting• Monitoring and managing staff access to systems and facilities• Monitoring and managing staff absences, administration and assessments• Monitoring staff conduct and disciplinary matters• Compliance with our legal, regulatory, corporate and charitable governance obligations and good practice• Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests• Ensuring business policies are adhered to
Personal Data	<p>Information relating to identifiable individuals. SCA holds personal data about clients, volunteers, trustees, job applicants, as well as current and former employees and suppliers.</p>

	<p>To achieve our legitimate business purposes, we will collect, process and store personal data. Personal data we gather may include, but is not limited to:</p> <ul style="list-style-type: none"> • Contact details • Age and gender identity • Educational and/or employment history • Additional needs statements
<p>Sensitive Personal Data</p>	<p>Sensitive personal data that is collected by us may include, but is not limited to:</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Family circumstances • Physical or mental health conditions • Criminal offences or related proceedings. <p>Any use of sensitive personal data should be strictly controlled in accordance with this policy and stored securely in a locked cupboard or encrypted spreadsheet.</p>

Scope

This policy is applicable to all SCA staff and volunteers. You must be familiar with this policy and comply with its terms.

This policy supplements SCA’s Confidentiality Policy and SCA’s Internet and Email Policy Statement.

SCA may supplement or amend this policy with additional policies and guidelines. Any new or modified policy will be circulated to staff and ratified by the Executive Committee before coming into effect.

Who is responsible for this policy?

SCA’s Data Protection Officer (DPO) is **Caroline Ward**.

The Data Protection Officer has overall responsibility for the day-to-day implementation of this policy. You can contact the DPO with queries or concerns in the following ways:

Email
mail@cambridgesca.org.uk

Telephone
 07849 811473

In writing or in person
 Student Community Action,
 3rd floor, University Centre,
 Granta Pl, Mill Ln, Cambridge
 CB2 1RU

Fair and Lawful Processing

Cambridge SCA must process personal data fairly and lawfully in accordance with an individual's rights as outlined in the General Data Protection Regulation.

Responsibilities of the Data Protection Officer

The Data Protection Officer is required to:

- Keep the Executive Committee updated regarding data protection responsibilities, risks and issues.
- Review all data protection procedures and policies on a regular basis.
- Arrange data protection training and advice for all staff members and individuals highlighted in this policy.
- Answer questions on data protection from staff, the Executive Committee, and other stakeholders.
- Respond to requests from those who wish to know which personal data SCA holds on them.
- Check and approve contracts and/or agreements regarding data processing with any third parties that handle Cambridge SCA's data.
- Ensure all systems, services, software and equipment meet acceptable security standards.
- Check and scan security hardware and software regularly to ensure functionality.
- Research any third-party services Cambridge SCA would like to use to store or process personal data.

Responsibilities of the Volunteers and Projects Officer

The Volunteers and Projects Officer is required to:

- Approve data protection statements used in emails and marketing materials.
- Address data protection queries from clients, target audiences or media outlets.
- Coordinate with the DPO to ensure all marketing initiatives adhere to data protection laws and Cambridge SCA's Data Protection Policy.

Data Processing

The processing of all data must be necessary to deliver our services. We will not collect, process or store unnecessary data.

In most cases, this provision will apply to routine business data processing activities. A list of our business processes can be found in Appendix I of this document.

Our Privacy Notice which you can find in Appendix I of this document details the data processes for individual data subjects (staff, volunteers, clients etc) and individual projects.

The Privacy Notice highlights:

- The purposes for which we hold personal data on individual data subjects.
- The fact that our work may require us to share information to third parties such as expert witnesses and other professional advisers.
- That clients have a right of access to the personal data we hold on them.
- That Client Referral Forms contain a link to our full Privacy Notice to clients on data protection.

Sensitive Personal Data

In the processing of sensitive personal data Cambridge SCA will require the data subject's explicit consent, unless in exceptional circumstances or Cambridge SCA is required to do this by law. For example, to comply with legal obligations to ensure health and safety at work.

Any such consent will need to clearly identify:

- What sensitive personal data is being collected?
- Why is this data being processed?
- To whom will this data be disclosed?

Our Privacy Notice (in Appendix I) details our data processes for individual projects and data subjects.

Accuracy and Relevance

Cambridge SCA will ensure that any personal data we process and/or store is:

- Accurate
- Adequate
- Relevant
- Not excessive
- Used for the purpose it was obtained.

We will not process personal data obtained for one purpose for another business process unless the individual concerned has consented to this or would reasonably expect this.

Individuals may ask that we correct inaccurate personal data stored by Cambridge SCA. If you believe that any information stored by Cambridge SCA is inaccurate, you should:

- Record the fact that the accuracy of the information has been disputed
- Inform the Data Protection Officer **Caroline Ward**:

Email
mail@cambridgesca.org.uk

Telephone
07849 811473

In writing or in person
Student Community Action,
3rd floor, University Centre,
Granta Pl, Mill Ln, Cambridge
CB2 1RU

Your Personal Data

You must take reasonable steps to ensure that personal data Cambridge SCA holds about you is accurate and updated as required.

If your personal circumstances change, please inform us by one of the following channels to update your records:

Email
mail@cambridgesca.org.uk

Telephone
07849 811473

In writing or in person
Student Community Action,
3rd floor, University Centre,
Granta Pl, Mill Ln, Cambridge
CB2 1RU

Storing Data Securely

At Cambridge SCA we take the security of data extremely seriously and employ the following guidelines:

- Where data is stored in hard-copy, it should be kept in a secure location within the Cambridge SCA main office where only authorised personnel can access it.
- Data stored in hard-copy should be shredded when no longer needed. Our retention period for data is clearly laid out in our Privacy Notice (Appendix I).
- Data stored electronically should be protected by strong passwords that are regularly updated. We require all staff to encrypt all documents containing personal data.
- Data stored on CDs or memory sticks must be securely locked away when not in use.
- The Executive Committee must approve any cloud storage, having considered the relevant security risks.
- Servers containing personal data must be kept in a secure location, separate from the general office space.
- General data should be regularly backed-up in line with Cambridge SCA's backup procedures. This backup is stored on a password protected Dropbox account to which current SCA staff have access to.

- Backups of financial and personal data is not stored on Dropbox and is stored securely on a USB at Cambridge SCA's satellite office at Varsity Farm, Chittering, CB25 9PW.
- Data should never be saved directly to personal devices such as laptops, personal computers, mobile phones or tablets. This includes forwarding emails containing personal data to personal email accounts.
- All servers containing sensitive data must be approved and protected by security software and a strong firewall.
- Passwords must not be shared via email or stored insecurely.

Data Retention

We do not retain data for longer than is set out in our Retention of Data Policy. You may find this information in our Privacy Notice in Appendix I.

Transferring Data Nationally and Internationally

There are restrictions on international transfers of personal data. You must not transfer personal data anywhere outside the UK without first consulting the Data Protection Officer, Caroline Ward.

Any documents containing personal data transferred within the UK should be encrypted and only shared if it is necessary for our business processes, consent has been given by the data subject or we are legally required to do so.

Subject Access Requests

Under the Data Protection Act 1998 individuals are entitled to request access to information held about them, subject to certain exceptions.

If you receive a subject access request, you should refer the request immediately to the Data Protection Officer Caroline Ward. We may ask you to help us comply with those requests.

There are restrictions on the information to which you are entitled under applicable law. If you would like to correct or request the information that we hold about you, please contact the Data Protection Officer Caroline Ward:

Email
mail@cambridgesca.org.uk

Telephone
07849 811473

In writing or in person
Student Community Action,
3rd floor, University Centre,
Granta Pl, Mill Ln, Cambridge
CB2 1RU

Processing Data in Accordance with the Individual's Rights

You should abide by any request from an individual not to use their personal data for direct marketing purposes and notify the Data Protection Officer Caroline Ward about any such request.

Do not send direct marketing material electronically unless you have an existing professional relationship with the individual in relation to the services being marketed.

Please contact the Data Protection Officer Caroline Ward for advice on direct marketing before starting any new direct marketing activity.

Training

All staff will receive training on this policy.

New joiners will receive training as part of the induction process and further training will be provided at least every two years or when a substantial change in the law or Cambridge SCA's policy and procedures occurs.

Training is provided via an in-house seminar. It covers:

- The law relating to data protection
- Cambridge SCA's data protection and related policies and procedures.

Completion of training is compulsory.

GDPR Provisions

Where not specified previously in this policy, the following provisions will come into effect on or before 25 May 2018.

Justification for Personal Data

Cambridge SCA will process personal data in compliance with all data protection principles.

- We will collect, store and process personal data only where we have a lawful basis to do so and it is necessary for us to do so.
- We will document the lawful bases for which we are collecting, storing and processing personal data.
- Our Privacy Notice will include our lawful basis for processing as well as the purposes of the processing.
- We will document the additional justification for the processing of sensitive data and will ensure any biometric and genetic data is considered sensitive.

Consent

For personal data that we collect and is subject to active consent by the data subject, we will ensure the data subject is aware they may revoke their consent at any time by contacting the Data Protection Officer Caroline Ward:

Email
mail@cambridgesca.org.uk

Telephone
07849 811473

In writing or in person
Student Community Action,
3rd floor, University Centre,
Granta Pl, Mill Ln, Cambridge
CB2 1RU

Criminal Record Checks

Any criminal record checks are justified by law and cannot be undertaken based solely on the consent of the subject.

Cambridge SCA undertake DBS (Disclosure and Barring Service) check on all staff members, all volunteers in one-to-one projects and group projects where work is with vulnerable children or adults.

Data Portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals.

A data subject may also request that their data is transferred directly to another system. This must be carried out free of charge.

Right to be Forgotten

A data subject may request that any information held on them is deleted or removed. Any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Data Audit and Register

Yearly reviews of this data protection policy will take place by the Executive Committee from April 2019. This will review what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

Reporting Breaches

All members of staff, volunteers, clients and Executive Committee members have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA) of any compliance failures that are material either in their own right or as part of a pattern of failures

To report a breach, you must contact the Data Protection Officer in writing:

Email mail@cambridgesca.org.uk	Telephone 07849 811473	In writing or in person Student Community Action, 3rd floor, University Centre, Granta Pl, Mill Ln, Cambridge CB2 1RU
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The Data Protection Officer must report the breach immediately to the Executive Committee so they can oversee the steps taken to remedy the issue. Any actual breaches of personal data must be reported to the ICO within the required timeframe.

Monitoring

All those involved with Cambridge SCA must observe this policy. The Data Protection Officer Caroline Ward has overall responsibility for this policy and will regularly ensure that it is adhered to.

Consequences of Failing to Comply

Cambridge SCA takes compliance with this policy very seriously. Failure to comply puts you and the organisation at risk. Therefore, failure to comply with any requirement of this policy may lead to disciplinary action under our procedures and may result in dismissal.

If you have any questions or concerns regarding this policy, please contact the Data Protection Officer Caroline Ward.

Email mail@cambridgesca.org.uk	Telephone 07849 811473	In writing or in person Student Community Action, 3rd floor, University Centre, Granta Pl, Mill Ln, Cambridge CB2 1RU
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Privacy Notice (Appendix I)

Being transparent and providing accessible information to individuals about how we use their personal data is important for Cambridge SCA. This privacy notice sets out clearly why and how we use data you provide to us.

One-to-One Volunteering Projects

Data Subject	Volunteers
What information do we collect?	Personal contact details, referee details, DBS reference number, check in notes regarding ongoing visits and photos of volunteer with their client if permission has been given by the parent and volunteer.
Who collects it?	Volunteers and Projects officer and SCA Manager
How is it collected?	Email, phone, paper copy, recorded on encrypted spreadsheet
Why is it being collected?	To enable clients to receive support, to monitor progress, to gather information on volunteers, to monitor grants, to fulfil our safeguarding obligations to both client and volunteer
How will it be used?	To facilitate our work and provide monitoring information to funders
Who will it be shared with?	Client will be given a contact number for the volunteer, external organisations will have the info if there are safeguarding obligations. Statistical data is shared with Trustees and funders
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Office Manager - Caroline Ward - 07749738870
Retention Period	1 year after graduation or after last contact with client.

Data Subject	Clients
What information do we collect?	Personal contact details, reason for referral, referring agent, request of need, check in notes regarding ongoing visits and distance travelled, photos of the client with their volunteer if permission has been given by the parent.
Who collects it?	Volunteers and Projects officer and SCA Manager
How is it collected?	Email, phone, paper copy, recorded on encrypted spreadsheet
Why is it being collected?	To enable clients to receive support, to monitor progress, to gather information to monitor grants, to fulfil our safeguarding obligations to both client and volunteer
How will it be used?	To facilitate our work and provide monitoring information to funders
Who will it be shared with?	Volunteer will be given a contact number for the client, external organisations will have the info if there are safeguarding obligations. Statistical data is shared with Trustees and funders
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Office Manager - Caroline Ward - 07749738870
Retention Period	3 Years after last contact with family.

Data Subject	Referring Agents
What information do we collect?	Professional contacts and job titles
Who collects it?	Volunteers and Projects officer and SCA Manager
How is it collected?	Email or phone, recorded on encrypted spreadsheet
Why is it being collected?	To enable us to liaise with other professional organisations working with the same client, to advertise our events and projects
How will it be used?	Email marketing and communication
Who will it be shared with?	Nobody
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Office Manager - Caroline Ward - 07749738870
Retention Period	Until the email bounces or the person asks to be removed from the database.

Group Projects

Data Subject	Volunteers
What information do we collect?	Personal contact details, referee details, DBS reference number, attendance register
Who collects it?	Volunteers and Projects officer and Project Leader
How is it collected?	Volunteer application form and encrypted volunteer spreadsheet
Why is it being collected?	To facilitate provision of the project
How will it be used?	To facilitate our work and provide monitoring information to funders
Who will it be shared with?	Volunteer Project Leader
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Office Manager - Caroline Ward - 07749738870
Retention Period	1 Year after graduation or the last time they volunteered.

Data Subject	Clients
What information do we collect?	Contact details of the person we liaise with at the venue
Who collects it?	Volunteers and Projects officer and Project Leader
How is it collected?	Email, phone, paper copy, recorded on encrypted spreadsheet
Why is it being collected?	To facilitate provision of the project
How will it be used?	To facilitate our work and provide monitoring information to funders, to advertise our projects.
Who will it be shared with?	Volunteer Project Leader
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Volunteer Project Leader for individual projects
Retention Period	1 Year after we last working with the venue or as soon as they ask to be removed

Disclosure and Barring Service

Data Subject	DBS Registered Organisations
What information do we collect?	Contact details of organisations who register with us to act as their umbrella DBS organisation
Who collects it?	SCA Manager – Caroline Ward - 07749738870
How is it collected?	Paper form and recorded on encrypted spreadsheet
Why is it being collected?	To facilitate the processing of DBS checks
How will it be used?	To inform DBS clients of any changes, send invoices and chase up any missing information on DBS forms.
Who will it be shared with?	Disclosure and Barring Service if requested
Data controllers	Office Manager - Caroline Ward – 07749738870 V&P Officer – Rensa Gaunt – 07849811473
Retention Period	3 Years after the last DBS form is processed for that organisation or when they ask to be removed

Data Subject	DBS Individual Applicants
What information do we collect?	Applicant contact details, date of birth and form reference number. If offences are present on the form we are shown we keep unidentifiable risk assessment form.
Who collects it?	SCA Manager – Caroline Ward - 07749738870
How is it collected?	Paper form and recorded on encrypted spreadsheet
Why is it being collected?	To enable an individual to have a DBS check
How will it be used?	To process a DBS disclosure for the applicant.
Who will it be shared with?	Disclosure and Barring Service
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Office Manager - Caroline Ward - 07749738870
Retention Period	We securely destroy the processing form 2 months after the applicant has been sent their disclosure. It stays on the encrypted spreadsheet for up to 5 years.

Personnel Data

Data Subject	Cambridge SCA Staff
What information do we collect?	Employment Application forms and interview notes Contact details, Bank details, payroll information, supervision and appraisal notes, time sheets, sickness notes, disciplinary notes.
Who collects it?	SCA Manager – Caroline Ward - 07749738870
How is it collected?	Job application form, staff starters form, P60,
Why is it being collected?	To facilitate fair employment of staff
How will it be used?	To contact and pay staff, to record any development issues and training requirements
Who will it be shared with?	Employment sub committee of the Executive committee
Data controllers	Office Manager - Caroline Ward – 07749738870 Chair of the Employment sub committee
Retention Period	6 years after employment ceases for employed staff

Data Subject	Job Applicants
What information do we collect?	Employment Application forms and interview notes
Who collects it?	SCA Manager – Caroline Ward - 07749738870
How is it collected?	SCA staff application forms
Why is it being collected?	To facilitate fair employment of staff
How will it be used?	To facilitate fair employment of staff
Who will it be shared with?	Employment sub-committee of the Executive committee
Data controllers	Office Manager - Caroline Ward – 07749738870 Chair of the Employment sub committee
Retention Period	1 year after interview

Data Subject	Trustees
What information do we collect?	Contact details, date of birth, employment history for new applicants
Who collects it?	Office Manager - Caroline Ward – 07749738870 Chair of the Employment sub committee
How is it collected?	Trustee Application form
Why is it being collected?	To ensure fair recruitment of trustees
How will it be used?	To ensure fair recruitment of trustees
Who will it be shared with?	Representatives of the Executive committee of Student Community Action
Data controllers	Office Manager - Caroline Ward – 07749738870 Chair of the Employment sub committee
Retention Period	3 months after the recruitment of Trustees if unsuccessful, otherwise 3 years after resigning from the board of trustees.

Data Subject	Steering Group Volunteers
What information do we collect?	Contact details, date of birth, employment / volunteering history for applicants to the steering group
Who collects it?	V&P Officer – Rensa Gaunt – 07849811473
How is it collected?	Application form
Why is it being collected?	To ensure fair recruitment of steering group members
How will it be used?	To ensure fair recruitment of steering group members
Who will it be shared with?	SCA Manager and Executive committee
Data controllers	V&P Officer – Rensa Gaunt – 07849811473 Office Manager - Caroline Ward - 07749738870
Retention Period	1 Year after recruitment of the steering group