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The Leaside Trust

Data Protection Policy

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Definitions

Organisation means The Leaside Trust, a registered charitable company limited by guarantee

DPA means the Data Protection Act 2018 which implements the EU's/UK's General Data Protection Regulation.

Responsible Person means the Chief Executive and the Board of Trustees

Register of Systems means a register of all systems or contexts in which personal data is processed by the Organisation.

1. Data protection principles

The Organisation is committed to processing data in accordance with its responsibilities

under the DPA.

DPA requires that personal data shall be:

processed lawfully, fairly and in a transparent manner in relation to individuals;

a. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
b. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
c. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
d. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
e. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

a. This policy applies to all personal data processed by the Organisation.
b. The Responsible Person shall take responsibility for the Organisation's ongoing compliance with this policy.
c. This policy shall be reviewed at least annually.
d. The Organisation shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

a. To ensure its processing of data is lawful, fair and transparent, the Organisation shall maintain a Register of Systems.
b. The Register of Systems shall be reviewed at least annually.
c. Individuals have the right to access their personal data and any such requests made to the Organisation shall be dealt with in a timely manner.

4. Lawful purposes

a. All data processed by the Organisation must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
b. The Organisation shall note the appropriate lawful basis in the Register of Systems.
c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Organisation's systems.

5. Data minimisation

a. The Organisation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
b. Data is collected electronically through BOOKWHEN and MYCLUBHOUSE. The data supplied is only used to enable Leaside to provide safe sessions, and supplied by parent/guardian or individual adult clients.

6. Accuracy

a. The Organisation shall take reasonable steps to ensure personal data is accurate.
b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

c. All information is supplied by parents/guardians or individual adult clients and can only be updated by them.

7. Archiving / removal

a. To ensure that personal data is kept for no longer than necessary, all information must be updated by parents/guardians or individual adult clients every 12 months, after which the information is archived and expired members are systematically removed from the my.clubhouse system on a monthly basis

8. Security

a. To ensure that personal data is stored securely, Leaside deploys systems that have a high security rating and use a high data security certificate. All personal systems such as desktops and laptops must have firewall and anti-malware software.
b. Access to personal data is limited to those members of staff on needs basis approved by the CEO.
c. When personal data is deleted, this it is done safely such that the data is irrecoverable.
d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental loss, alteration, unauthorised disclosure of, or access to, personal data, The Board of Trustees shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.