

The lawful and appropriate management of personal data is extremely important to Home-Start Surrey Heath.

This policy sets our commitment to protecting personal data and how we will implement this with regards to the collection and handling of personal data. The relevant legislation that this policy conforms to can be found in appendix 2

Failure to comply with data protection legislation could lead to financial penalties, regulatory action, as well as reputational damage.

This policy applies to:

- All Staff, including temporary staff
- Trustees/Advisers
- Volunteers

The Data Protection Principles

Data protection laws describe how organisations must collect, handle and store all personal data. Ensuring and demonstrating compliance is underpinned by the following principles.

Personal data must be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 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;
- 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.

Responsibilities for Compliance

- **Trustees** are ultimately responsible for ensuring that Home-Start Surrey Heath meets its legal obligations.
- **All staff** have a responsibility for ensuring personal data is collected, stored and handled appropriately and must ensure that it is handled and processed in line with this policy and the data protection principles.
- **DP Lead** is responsible for monitoring compliance with this policy and the data protection legislation; managing personal data breaches and data subject rights; recording and maintaining appropriate records of processing activities and the documented evidence required for compliance.

Home-Start Surrey Heath will implement appropriate security measures to protect personal data. Personal data will only be accessible to those authorised to access personal data on a 'need to know' basis. Employees, trustees and volunteers will keep all data secure, by taking sensible precautions and following the relevant Home-Start Surrey Heath policies and procedures relating to data protection.

Data Sharing

In certain circumstances Home-Start Surrey Heath may share personal data with third parties. This may be part of a regular exchange of data, one-off disclosures, or in unexpected or emergency situations.

Appropriate security measures will be used when sharing any personal data.

Where data is shared regularly a contract or data sharing agreement will be in place to establish what data will be shared and the agreed purpose.

Home-Start Surrey Heath will consider all the legal implications of sharing personal data prior to doing so.

Data Subjects will be advised of any data sharing in the Privacy Notice.

Data Processors

Where Home-Start Surrey Heath engage Data Processors (e.g. outside contractors such as suppliers of IT systems, payroll or pensions providers to process personal data on our behalf, we will ensure:

- Data processors have appropriate technical security measures in place
- No sub-processors are used without prior written consent from Home-Start Surrey Heath
- An appropriate contract or agreement is in place explaining the full requirements of the data processor.

Security Incident & Breach Management

Occasionally Home-Start Surrey Heath may experience a personal data breach; this could be if personal data is:

- Lost, for example via misplacing documents or equipment that contain personal data, through human error, or via fire, flood or other damage to premises where data is stored.
- Stolen; theft or a result of a targeted attack on our network (cyber- attack).
- Accidentally disclosed to an unauthorised individual
- Inappropriately accessed or used

All security incidents or personal data breaches will be reported and managed by the Data Protection Lead. The Information Commissioner's Office and the individuals affected will be notified promptly, if required. All breaches will be managed using the Breach procedures within the Confidentiality policy.

Individual Rights

Home-Start Surrey Heath will uphold the rights of data subjects to access and retain control over their personal data held by us.

Home-Start Surrey Heath will comply with individuals':

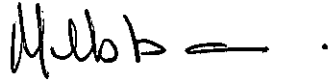
- **Right to be Informed** – by ensuring individuals are informed of the reasons for processing their data in a clear, transparent and easily accessible form and informing them of all their rights.

Policy Review

This policy will be reviewed annually, although changes will be made to the policy during the 12 month period if required to meet changes in legislation and to address any weakness identified in the policy.

Date of review by Board: 13th May 2019

Signature of Chair:

A handwritten signature in black ink, appearing to be 'M. Hobbs', followed by a horizontal line and a period.

Date of next review: May 2020

Record Retention Periods in Home-Start

Family and volunteer records

Family records, where no safeguarding concern	The family file is retained for 12 months from the date of ending Home-Start support. The file is stored securely and is marked with the date (month/year) it should be destroyed. The file will be securely destroyed at the appropriate date.
Family records, where a safeguarding concern was referred by Home-Start, or the family were subject to a child protection plan or a Child in Need Plan and any files containing a Record of Concern and Action	The family file is retained for 6 years from the date of ending Home-Start support. The file is stored securely and is marked with the date (month/year) it should be destroyed and stored securely. The file will be securely destroyed at the appropriate date.
Volunteer files	The volunteer file is retained for 12 months after the volunteer has ceased to be a Home-Start volunteer. Sufficient info in order to provide a reference may be retained. Exception: if an allegation has been made about the volunteer, the volunteer file should be retained until the volunteer reaches normal retirement age or for 10 years if that is longer.

Financial Records

Financial records	6 years
Payroll and tax information	6 years

Corporate

Employers Liability Certificate	40 years
Insurance policies	Permanently
Certificate of Incorporation	Permanently
Minutes of Board of Trustees	Permanently
Memorandum of Association	Original to be kept permanently
Articles of Association	Original to be kept permanently
Variations to the Governing Documents	Original to be kept permanently
Statutory Registers	Permanently
Membership records	20 years from commencement of membership register
Rental or Hire Purchase Agreements	6 years after expiry

Other

Deeds of Title	Permanently
Leases	12 years after lease has expired
Accident books	12 years from the date of the last recorded accident, see also records of injuries/accidents at work, above
Health & Safety Records	12 years