



Please also refer to the policy 2.5 Record Keeping and Document 16.1 Data Register.

The Charity is fully committed to compliance with the requirements of the Data Protection Act 2018 and all other data protection legislation currently in force. The Regulation applies to anyone processing personal data and sets out principles which should be followed and gives rights to those whose data is being processed.

To this end, the Charity endorses fully and adheres to the Data Protection Principles listed below. When processing data we will ensure that it is:

- processed lawfully, fairly and in a transparent way ('lawfulness, fairness and transparency');
- processed no further than the legitimate purposes for which that data was collected ('purpose limitation');
- limited to what is necessary in relation to the purpose ('data minimisation');
- accurate and kept up to date ('accuracy');
- kept in a form which permits identification of the data subject for no longer than is necessary ('storage limitation');
- processed in a manner that ensures security of that personal data ('integrity and confidentiality');
- processed by a controller who can demonstrate compliance with the principles ('accountability').

These rights must be observed at all times when processing or using personal information. Therefore, through appropriate management and strict application of criteria and controls, the Charity will:

- observe fully the conditions regarding having a lawful basis to process personal information;
- meet its legal obligations to specify the purposes for which information is used;
- collect and process appropriate information only to the extent that it is necessary to fulfil operational needs or to comply with any legal requirements;
- ensure the information held is accurate and up to date;
- ensure that the information is held for no longer than is necessary;
- ensure that the rights of people about whom information is held can be fully exercised under the Data Protection Act 2018 (i.e. the right to be informed that processing is being undertaken, to access personal information on request; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information);
- take appropriate technical and organisational security measures to safeguard personal information;
- ensure that personal information is not transferred outside the EU, to other countries or international organisations without an adequate level of protection.

Employees' Personal Information

Throughout employment and for as long as is necessary after the termination of employment, the Charity will need to process data about you. The kind of data that the Charity will process includes:

- any references obtained during recruitment;
- details of terms of employment;
- payroll details;
- tax and national insurance information;
- details of job duties;
- details of health and sickness absence records;
- details of holiday records;
- information about performance;
- details of any disciplinary and grievance investigations and proceedings;
- training records;
- contact names and addresses;
- correspondence with the Charity and other information that you have given the Charity.

The Charity believes that those records used are consistent with the employment relationship between the Charity and yourself and with the data protection principles. The data the Charity holds will be for management and administrative use only but the Charity may, from time to time, need to disclose some data it holds about you to relevant third parties, for example where legally obliged to do so by HM Revenue & Customs, where requested to do so by yourself for the purpose of giving a reference or in relation to maintenance support, and/or the hosting of data in relation to the provision of insurance.

In some cases the Charity may hold sensitive data, which is defined by the legislation as special categories of personal data, about you. For example, this could be information about health, racial or ethnic origin, criminal convictions, trade union membership, or religious beliefs. This information may be processed not only to meet the Charity's legal responsibilities but, for example, for purposes of personnel management and administration, suitability for employment, and to comply with equal opportunity legislation. Since this information is considered sensitive, the processing of which may cause concern or distress, you will be asked to give express consent for this information to be processed, unless the Charity has a specific legal requirement to process such data.



Access to Data

You may, within a period of one month of a written request, inspect and/or have a copy, subject to the requirements of the legislation, of information in your own personnel file and/or other specified personal data and, if necessary, require corrections should such records be faulty. If you wish to do so you must make a written request to your Manager. The Charity is entitled to change the above provisions at any time at its discretion.

Data Security

You are responsible for ensuring that any personal data that you hold and process as part of your job role is stored securely.

You must ensure that personal information is not disclosed orally, in writing, via web pages, or by any other means, accidentally or otherwise, to any unauthorised third party.

You should note that unauthorised disclosure may result in action under the Disciplinary Procedure, which may include dismissal for gross misconduct. Personal information should be kept in a locked filing cabinet, drawer, or safe. Electronic data should be coded, encrypted, or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

When travelling with a device containing personal data, you must ensure both the device and data is password protected. The device should be kept secure and, where possible, it should be locked away out of sight, for example in the boot of a car. You should avoid travelling with hard copies of personal data where there is secure electronic storage available. When it is essential to travel with hard copies of personal data this should be kept securely in a bag and where possible locked away out of sight, for example in the boot of a car.

Notifying Breaches

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or processed.

The following are examples of data breaches

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a data controller or data processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission;
- loss of availability of personal data.



Investigation and Notification

In the event that we become aware of a breach, or a potential breach, an investigation will be carried out. This investigation will be carried out by a senior member of staff.

We will undertake to notify the Information Commissioner of a breach which is likely to pose a risk to people's rights and freedoms without undue delay and at the latest within 72 hours of discovery. If we are unable to report in full within this timescale, we will make an initial report to the Information Commissioner, and then provide a full report in more than one instalment if so required.

We will undertake to notify the individual whose data is the subject of a breach if there is a high risk to people's rights and freedoms without undue delay and may, dependent on the circumstances, be made before the supervisory authority is notified.

Record of Breaches

The Charity records all personal data breaches regardless of whether they are notifiable or not as part of its general accountability requirement under the Data Protection Act 2018. It records the facts relating to the breach, its effects and the remedial action taken.

When an individual signs up to any of our services, Aiming Higher obtains information about the individuals who will benefit from those services.

This statement explains how we look after that information and what we do with it.

Aiming Higher has a legal duty under the DPA and GDPR to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Normally, the only information we hold comes directly from you or from an organisation to which you have given your consent to share your information with us. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, services or goods you need. You do not have to provide us with any additional information unless you choose to do so.

We store your information securely on our computer system and restrict access only to those persons who have a need to know. Our workforce and representatives are fully trained in handling your information securely.

If you have signed up to a service, we will pass your details to the professional worker providing that service. That worker may gather and record additional information about your circumstances, health and wellbeing on a regular basis so that we can ensure you always receive the best possible service from us.

We may wish to contact you in the future to tell you about other services we provide, to keep you informed of what we are doing and ways in which you might like to engage with Aiming Higher. You have the right to



ask us not to contact you in this way. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing materials. Very occasionally, we may carry out a joint mailing, with carefully selected partner organisations, in order to tell you about products and services we think you might be interested in. Again, you have the right to opt out of this. You have the right to request a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy of this information, either contact us by telephone on 01253 376200 to request an application form to be sent to you or write to: The Data Protection Officer Aiming Higher 231-233 Church Street Blackpool FY 3PB There is a charge of £10 for a copy of your data (as permitted by law) and this payment should accompany your letter of request. Cheques should be made payable to Aiming Higher. We aim to reply as promptly as we can and, in any case, within the legal maximum of 40 days.
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Policy Review

The policy will be reviewed annually and approved by the Board of Trustees. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.