

## LITEWAVES DATA PROTECTION PROCEDURES POLICY

Lite-Waves Therapeutic Education needs to keep certain information on its employees, volunteers, service users and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers all members of staff whether paid or unpaid, full-time or part-time as well as clients/service users and members of partner organisations associated with Lite-Waves.

In line with the Data Protection Act 1998 principles, Lite-Waves Therapeutic Education will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

Lite-Waves Therapeutic Education process the following personal information:

- Information on applicants for posts, including references
- Employee information – contact details, bank account number, payroll information and performance appraisal notes.
- Contact details of people associated with partner organisations, schools and community centres where Lite-Waves' programmes are delivered

We need to keep a record of the people who use our programmes in order to inform them of future events and for monitoring and evaluation purposes. This will be in paper form and will contain names of the attendees as well as basic demographic information, such as gender, age and ethnic/religious background. This will be handled with the utmost discretion by our programme facilitators, and will be kept in our offices in designated files with restricted access.

Under the Data Protection Guardianship Code, overall responsibility for personal data rests with the governing body. In the case of Lite-Waves Therapeutic Education this is the management board

All staff whether paid or unpaid full-time or part-time, as well as members of partner organisations who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles. Breach of this policy will result in disciplinary proceedings.

To meet our responsibilities all staff and people associated with the work delivered by Lite-Waves will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely

Training about the Data Protection Act within Lite-Waves will take the form of raising awareness among staff and people through in house training or from partner organisations associated with Lite-Waves. This includes reminders to members of staff of what information will be kept, on which occasions personal information will be kept and for how long.

Before personal information is collected, we will consider:

- What details are necessary for our purposes
- How long we are likely to need this information

We will inform people whose information is gathered about the following:

- why the information is being gathered
- what the information will be used for
- who will have access to their information (including third parties)

Personal sensitive information will not be used apart from the exact purpose for which permission was given

Lite-Waves Therapeutic Education will take the following steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure:

- Password protection on personal information files
- Setting up computer systems to allow restricted access to certain areas
- Whenever we need to keep a list of programme users, this will be in paper form and will be kept in lockable cupboards/drawers with restricted access to keys.

Any unauthorised disclosure of personal data to a third party by an employee will result in disciplinary proceedings.