

DATA PROTECTION AND CONFIDENTIALITY POLICY

INTRODUCTION

SNAPS has a duty of care with regards to the Data Protection and Confidentiality of information stored in relation to the families using our services. SNAPS regards the lawful and correct treatment of personal data as an integral part of its function and vital for maintaining confidence between families and ourselves. This policy applies to all staff, volunteers, Trustees and families who come into contact with personal information.

For the purposes of this policy data refers to information which:

- Is being processed by means of equipment operating automatically in response to instructions given for that purpose;
- Is recorded with the intention that it should be processed by means of such equipment;
- Is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system;
- Forms part of accessible records;
- Includes disclosure under the Disclosure and Barring Service;
- Is not kept for longer than necessary.

AIM

The aim of this policy is to provide the employees, volunteers, Trustees and families using SNAPS' services with a framework for the lawful, secure and confidential processing of personal data in accordance with the Data Protection Act of 1998. SNAPS has up-to-date registration under the Data Protection Act with the Information Commissioner's Office.

SNAPS will through appropriate management and controls:

- Observe fully the conditions regarding the fair collection and use of information;
- Meet its legal obligation to specify the purposes for which its information is used;
- Collect and process appropriate information and only to the extent that it is need to fulfil operational needs or to comply with any legal requirements;
- Ensure the rights of people for about whom information is held can be fully exercised under the act;
- Take appropriate technical or organisational security measures to safeguard personal data;
- Ensure that personal data are not transferred without suitable safeguards.

ROLES AND RESPONSIBILITES

SNAPS will ensure that everyone managing and processing personal data understands that they are contractually responsible for following good data protection practice and where appropriate are bound by common law duty of confidence. These responsibilities apply to all persons who have contact with SNAPS.

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SNAPS' Project Manager is the appointed Data Protection Officer. The officer will ensure that legislation requirements are met as well as ensure that all staff adhere to legislation requirements.

SNAPS will specifically ensure that:

- Everyone managing and handling personal data is appropriately trained to do so.
- Methods of handling personal data are clearly described.

SNAPS will ensure that adequate training is provided for all staff involved with the processing of personal data and that qualified expertise is available for consultation.

An annual audit review will be carried out in respect of the way personal data is managed and any changes to the management of the data will be reviewed and updated accordingly.

Amendments will be made to the policy where necessary and all the staff members will be informed and training given where appropriate.

REVIEW PROGRAMME:

DRAFTED 23 January 2017 / TRUSTEE REVIEW 30 January 2017 / NEXT REVIEW 30 January 2018