

Data Protection Policy

Introduction

The Inside Out Community is committed to processing and handling data in accordance with its responsibilities under the GDPR. The Inside Out Community will make every effort to ensure that only the minimum amount of data is processed in order to effectively operate our services. Inside Out Community is committed to ensuring that all data is held as securely as possible and that we operate in a transparent manner.

Aim of Policy

The aim of this policy is to ensure that all staff, participants and stake holders of the Inside Out Community understand the importance and processes that the Inside Out Community considers in relation to data protection.

Definition

GDPR means General Data Protection Regulation. The GDPR forms part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018) and Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019. The main provisions of this apply, like the GDPR, from 25 May 2018.

1. Data protection principles

The Inside Out Community is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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 GDPR in order to safeguard the rights and freedoms of individuals; and
- f. 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 Inside Out Community.
- b. The Inside Out Community Board of Trustees shall take responsibility for the Charity's ongoing compliance with this policy.
- c. A nominated trustee is responsible for checking the policy to ensure continued effectiveness, particularly that: Elene Marsden

- d. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Inside Out Community will 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 Inside Out Community shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the Inside Out Community 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](#)). The majority of data processed by the Inside Out Community is done so under the lawful basis of legitimate interest.
- b. The Inside Out Community 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.

5. Data minimisation

- a. The Inside Out Community shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Inside Out Community 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.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Inside Out Community shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why. Sensitive data will be kept on individuals for a maximum of 3 years after they cease contact with Inside Out Community

8. Security

- a. The Inside Out Community shall ensure that personal data is stored securely using password protected documents and locked filing cabinets to store data.
- b. Data is stored on third party provider Hubspot which
- c. Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- d. When personal data is deleted this will be done safely such that the data is irrecoverable.
- e. Appropriate back-up and disaster recovery solutions shall be in place using a password collected cloud system.



9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Inside Out Community shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

Adopted by Inside Out Community Board of Trustees

Date:

Signed:

To be reviewed on: