



DATA PROTECTION CONFIDENTIALITY POLICY

APPROVED BY:

Directors

LAST REVIEWED:

07/07/22

NEXT REVIEW:

07/07/23

This policy sets out the obligations of Community Court Yard regarding data protection and the rights of employees, volunteers, participants and any other data subjects engaged with the organisation in respect of their personal data, under the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA) 2018.

It also sets our obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by staff both paid and unpaid at Community Court Yard.

Community Court Yard follows the Data Protection Principles outlined in General Data Protection Regulation, which are summarised below:

- Personal data will be processed fairly, lawfully and in a transparent manner;
- Data will only be collected and used for specified, explicit and legitimate purposes;
- Data will be adequate, relevant and not excessive;
- Data will be accurate and up to date;
- Data will not be held any longer than necessary;
- Data subject's rights will be respected;
- Data will be kept safe from unauthorised access, accidental loss or damage;
- 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;
- Data will not routinely be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

Data Security

Community Court Yard will ensure that the following measures are to all communications and other transfers involving personal data:

- Personal data must never be included within the subject line or message body of an email;
- All personal data documents legitimately transmitted via IT systems (e.g. email) must be protected using a strong password and marked "confidential"
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated must also be deleted
- Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using Special Delivery post

The following measures are taken with respect to the storage of personal data:

- All electronic copies of personal data should be stored securely either by using passwords or restricted permissions on folders.
- All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar.
- When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of.

The following measures are taken in regards to the use of personal data:

- Personal data processed must only be used for the purpose it was collected for.
- No personal data may be shared informally and/or transferred elsewhere. If they require access to any personal data that they do not already have access to, such access should be formally requested from the management team.
- Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised parties at any time.

Community Court Yard shall ensure that the following measures are taken with respect to IT and information security:

- All passwords used to protect personal data do not use words or phrases that can be easily guessed or otherwise compromised.
- All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols
- Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method.
- All software (including, but not limited to, applications and operating systems) will be kept up-to-date.
- No software may be installed on any Community Court Yard owned computer or device without the prior approval of the Operations Staff.

All employees, volunteers or other parties working on behalf of Community Court Yard shall be made fully aware of both their individual responsibilities under Data Protection Legislation and under this Policy and shall be provided with a copy of this Policy;

- Who only need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held will be appropriately trained to do so; handling personal data will be appropriately supervised;
- staff shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise.
- Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed.
- All personal data held shall be reviewed regularly.