



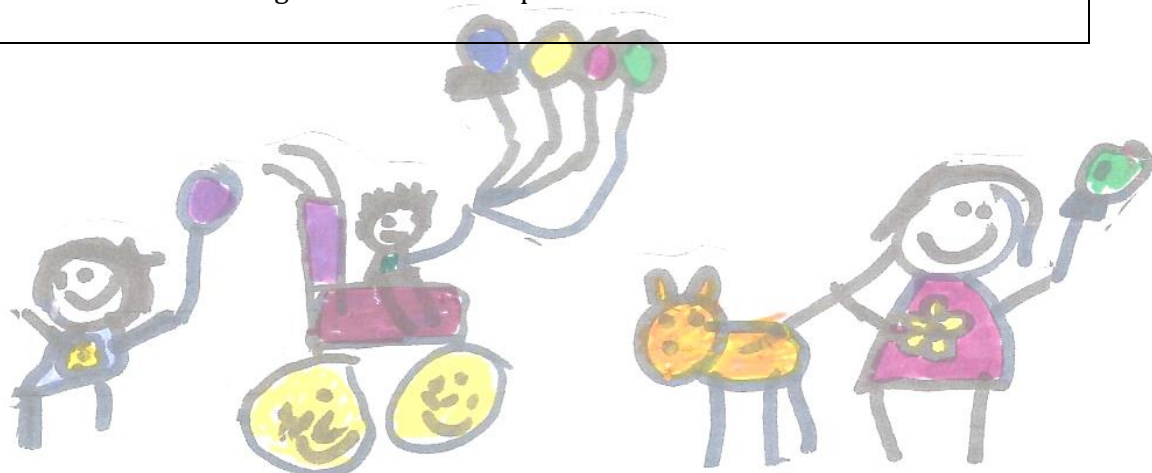
## Data Protection Policy, including Key Procedures

Name of organisation: JIGSAW Thornbury

HEADING	SECTION CONTENT
<b><u>Aims of this Policy</u></b>	<p>JIGSAW Thornbury needs to keep certain information on its workers, service users and directors to carry out its day to day operations, to meet its objectives and to comply with legal obligations.</p> <p>The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998 (DPA). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>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.</p> <p>This policy covers the duties and responsibilities of employed staff, directors, and volunteers.</p>

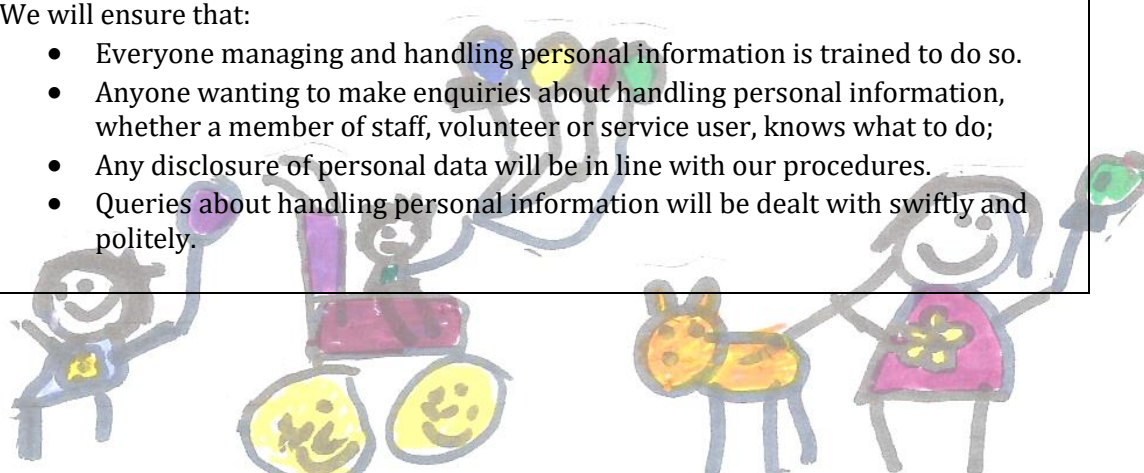


<p><b>Definitions</b></p>	<p>In line with the Data Protection Act 1998 principles, JIGSAW will ensure that personal data will:</p> <ul style="list-style-type: none"> <li>• Be obtained fairly and lawfully and shall not be processed unless certain conditions are met</li> <li>• Be obtained for a specific and lawful purpose</li> <li>• Be adequate, relevant but not excessive</li> <li>• Be accurate and kept up to date</li> <li>• Not be held longer than necessary</li> <li>• Be processed in accordance with the rights of data subjects</li> <li>• Be subject to appropriate security measures</li> <li>• Not to be transferred outside the European Economic Area (EEA)</li> </ul> <p>The definition of 'Processing' covers obtaining, using, holding, amending, disclosing, destroying and deleting personal data. The relevant records held by JIGSAW Thornbury are both manual/paper-based and held on computer.</p> <p>The DPA Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. JIGSAW Thornbury will seek to abide by this code in relation to all the personal data it processes, i.e.</p> <ul style="list-style-type: none"> <li>• <b>Accountability:</b> those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.</li> <li>• <b>Visibility:</b> 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.</li> <li>• <b>Consent:</b> 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.</li> <li>• <b>Access:</b> 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.</li> <li>• <b>Stewardship:</b> Those collecting personal data have a duty of care to protect this data throughout the data life span.</li> </ul>
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<b>Type of information processed</b>	<p>JIGSAW Thornbury processes the following personal information:</p> <ul style="list-style-type: none"> <li>• Information on applicants for posts, including references</li> <li>• Employee information – contact details, employee records, payroll information, supervision and appraisal notes.</li> <li>• Service Users/Client Files – personal &amp; contact details, care plans</li> <li>• Volunteer information – contact information and allocation of responsibilities</li> <li>• Donors (if providing donations into funds)</li> </ul> <p>Authority to process information is restricted to the Manager, who may delegate this authority for limited specific purposes when the processing will be carried out under supervision.</p>
<b>Responsibilities</b>	<p>Under the DPA Guardianship Code, overall responsibility for personal data rests with the Directors of JIGSAW Thornbury.</p> <p>The Directors delegate the following responsibilities to the Manager:</p> <ul style="list-style-type: none"> <li>• understanding and communicating obligations under the Act, particularly to those who process information on behalf of JIGSAW Thornbury</li> <li>• identifying potential problem areas or risks</li> <li>• producing clear and effective procedures</li> </ul> <p>Breaches of this policy will result in appropriate disciplinary proceedings.</p>
<b>Policy Implementation</b>	<p>To meet our responsibilities JIGSAW Thornbury will:</p> <ul style="list-style-type: none"> <li>• Ensure any personal data is collected in a fair and lawful way;</li> <li>• Ensure that only the minimum amount of information needed is collected and used;</li> <li>• Ensure the information used is up to date and accurate;</li> <li>• Review the length of time information is held;</li> <li>• Ensure it is kept safely;</li> <li>• Ensure the rights people have in relation to their personal data can be exercised</li> </ul> <p>We will ensure that:</p> <ul style="list-style-type: none"> <li>• Everyone managing and handling personal information is trained to do so.</li> <li>• Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;</li> <li>• Any disclosure of personal data will be in line with our procedures.</li> <li>• Queries about handling personal information will be dealt with swiftly and politely.</li> </ul>





<b>Training</b>	Training and awareness-raising about the Data Protection Act and how it is followed in this organisation will be provided at Induction and through general training/ awareness-raising.
<b>Gathering and Checking Information</b>	<p>JIGSAW Thornbury commits to using personal data only for the purposes that would be presumed by the data subjects and to advise data subjects if there is intention to use information in a way they would not expect. Information will be used fairly and lawfully, and held only for the duration that is necessary. Information held will be accurate and updated where necessary. Authority to process personal information will be determined by the Directors.</p> <p>Personal sensitive information will not be used apart from the exact purpose for which permission was given.</p>
<b>Data Security</b>	<p>JIGSAW Thornbury will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:</p> <ul style="list-style-type: none"> <li>• Using lockable cupboards (restricted access to keys)</li> <li>• Password protection on personal information files</li> <li>• Restricting permission for personal data to be taken off site to the minimum necessary for administrative purposes</li> <li>• Back up of data on computers</li> <li>• Password protected attachments for sensitive personal information sent by email</li> </ul> <p>Any unauthorised disclosure of personal data to a third party will result in appropriate disciplinary proceedings.</p>
<b>Subject Access Requests</b>	<p>Anyone whose personal information is processed by JIGSAW Thornbury has the right to know:</p> <ul style="list-style-type: none"> <li>• What information we hold and process on them</li> <li>• How to gain access to this information</li> <li>• How to keep it up to date</li> <li>• What we are doing to comply with the Act.</li> </ul> <p>They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.</p> <p>Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person or their duly appointed representative wishing to exercise this right should apply in writing to: Managing Director, JIGSAW Thornbury, 32 Hyde Ave, Thornbury BS35 1HZ</p> <p>The following information will be required before access is granted:</p> <ul style="list-style-type: none"> <li>• Full name and contact details of the person making the request</li> <li>• Their relationship with the organisation (former/current member of staff, director, other volunteer, service user etc)</li> <li>• Any other relevant information - e.g. timescales involved</li> </ul> <p>JIGSAW Thornbury may also require proof of identity before access is granted. Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request.</p>



<b>Declaration</b>	<p>All those with access to use or process personal information held by JIGSAW Thornbury will be required to provide the following declaration:</p> <p>I confirm that I have read and understood this Data Protection Policy and will act in accordance with it.</p> <p>I am connected with this organisation in my capacity as a</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Member of staff</li><li><input type="checkbox"/> Volunteer</li><li><input type="checkbox"/> Director</li></ul> <p>Signature:</p> <p>Print name:</p> <p>Date:</p> <p>Please return this form to: Managing Director, JIGSAW Thornbury, 32 Hyde Ave, Thornbury, BS35 1HZ.</p>
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