

**Data Protection Policy** 

Welcome to the UK recognises the need to comply with the various laws regulating the processing of personal data. It is our desire that employees recognise the risks involved when dealing with such information and fully understand the steps that must be taken in order to minimise such risks. It is Welcome to the UK's policy to educate and inform employees about the dangers of inappropriate and illegal use of the personal data they may have access to.

Welcome to the UK abides by the six guiding principles of Data Protection

- 1. Personal data shall be:
  - 1. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
  - 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, in accordance with <u>Article 89(1)</u>, not be considered to be incompatible with the initial purposes ('purpose limitation');
  - 3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
  - 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 ('accuracy');
  - 5. 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 in accordance with <u>Article 89(1)</u> subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
  - 6. 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 ('integrity and confidentiality').

Whenever you are involved in processing any personal data, you must ensure that all associated procedures have been sanctioned by your manager/trustees. You must only operate within sanctioned procedures:-

- If for any reason registration of the information is withdrawn you must stop using the particular data immediately. Your manager will advise you of this
- You must ensure that your appropriate records are maintained and safe and are only used to perform your particular job
- You must ensure that all personal data is used, held and disclosed only for the registered purpose: you should not use any of the systems outside of this criteria
- Information must be collected and processed in a prudent and lawful manner and should be kept up to date and accurate at all times
- Information must not be transferred to countries outside the EU without authorisation from your Line Manager
- The information should only be retained for the period necessary, and for the purpose for which it is held

If you have any concerns or questions regarding the processing or use of personal data you should contact your manager as soon as possible. If in any doubt you should cease to process the information.

If you are required to use electronic equipment such as a computer or data-holding device your actions should comply with this. It is your responsibility to ensure that reasonable measures are taken to ensure the security of information contained within them. Such measures include keeping equipment in a lockable location when not in use and/or using password protection for files containing information covered by data protection legislation.

A breach of the data protection regulations or failure to adhere to Welcome to the UK's policies could have serious repercussions for Welcome to the UK and for yourself, if you are found responsible. It may also be treated as a serious disciplinary matter and may result in the termination of your employment or time volunteering with Welcome to the UK.

If you are aware of any breech of Data Protection you must bring it to the attention of your Line Manager immediately. Any failure to do this may result in disciplinary action against you.

If you have access to or are responsible for collecting personal information that relates to any of Welcome to the UK's clients or employees, the above guidelines should be strictly adhered to.

As a member of staff or volunteer you need to be aware that Welcome to the UK will hold details pertinent to your employment or volunteering on file as part of its personnel records. This may include sensitive information. This information may be processed for administrative or legal purposes or as required by your continued employment. This may include passing certain employment related data to third parties such as government authorities, suppliers or contractor organisations supplying services which require the use or creation of employee data (for example, payroll). Your data may also be used in emergency situations, to protect the legal interests and other rights of Welcome to the UK or in other situations where you have consented to the disclosure of such information.

The following are examples of information which may be retained by Welcome to the UK as part of its personnel records. The list is not exclusive or exhaustive:-

- References obtained during recruitment
- Details of terms of employment
- Payroll, tax and National Insurance information

- Performance information
- Details of grade and job duties
- Health records
- Absence records, including holiday records and self-certification forms
- details of any disciplinary investigations and proceedings
- Training records
- Contact names and addresses

It should also be noted that Welcome to the UK might hold the following information about you, for which disclosure will be made only when strictly necessary for the purposes set out below:-

- Your health, for the purposes of compliance with our health and safety and our occupational health obligations
- For the purposes of personnel management and administration, for example, to consider how your health affects your ability to do your job and, if you are disabled, whether you require any reasonable adjustment to be made to assist you at work
- The administration of insurance, pension, sick pay and other related benefits in force from time to time
- In connection with unspent convictions to enable us to assess your suitability in employment for relevant roles

Welcome to the UK will endeavour to update personnel files on a regular basis. It is your responsibility to ensure that any changes in personal details are communicated in writing to Welcome to the UK immediately, or as soon after the change as is practicable; and to inform your next of kin (or whoever you give as an emergency contact) that their details may be held on a personnel file.

Service users will be made aware that that if they chose to access Welcome to the UK Facebook page or join any associated groups your information may be viewed by other users. The Facebook Page and associated groups are administered by Welcome to the UK and all posts are verified before added. Any inappropriate posts will not be shown and users may be blocked from the page altogether if not complying with the rules of Welcome to the UK.

Welcome to the UK will collect data from members to enable the coordinator to contact members and offer appropriate groups and services. Data will not be shared with any other individual or organisation unless there is a safeguarding concern or to prevent harm or criminality. This is in line with Welcome to the UK safeguarding Policy. Individuals will be made aware of how their data will be used and stored when providing it.

All data will be stored on an encrypted electronic device and any paper forms will be stored in a secure location. Welcome to the UK will request information from users to ensure that held data is accurate and on annual basis will check this with service users. All information will be kept for 3 years following the last attendance in any Welcome to the UK activity. This data will only be used in an anonymised form to provide information to justify any grants received and charitable status. At the end of use all data will be destroyed securely.

## **Linked Policies**

- Equality and diversity
- Safeguarding

## Contact details

If an individual requests more information or has a query about their privacy and security, they should contact Amarilda Stafa (Data Processor) Founder and Coordinator of Welcome to the UK on 07398884141 or email <a href="welcome2theUK@yahoo.com">welcome2theUK@yahoo.com</a>. The Data Controller is Aline Clayson (Chair).

## <u>Statement</u>

We are committed to reviewing our policy and good practise annually. We will ensure staff and volunteers are made aware of any updates to this policy and good practice in data protection. This policy was created on 10<sup>th</sup> July 2019 and agreed by trustees at their meeting of 19<sup>th</sup> July 2019. The policy will be reviewed by 30<sup>th</sup> June 2020. This policy will be reviewed annually, checked against changes in legislation and guidance and presented to trustees for approval.

Signed

(Welcome to the UK, Trustee)