

Privacy Policy



Introduction

This Policy sets out Devon Development Education's (DDE) commitment to handling personal data in accordance with the EU General Data Protection Regulation 2016/679 (GDPR), effective May 2018.

The purpose of GDPR is to ensure that all personal data (this is defined as data which relates to a living individual who can be identified from that data or other information held by DDE) is collected, managed and used in a fair, lawful and transparent manner. GDPR seeks to prevent the misuse of personal data e.g. for unsolicited marketing, and ensure that individuals have agreed explicitly to provide their data to organisations like DDE.

DDE recognises its obligations concerning personal data and has prepared this Privacy Policy to help all its staff and volunteers understand and comply with GDPR.

It sets out DDE's approach to managing personal data and developing a security-conscious and ethical approach to handling personal and other sensitive data.

Scope

This Policy applies to all DDE employees, staff, associates, volunteers, trustees, members, contractors, or third parties, who process or access personal data on behalf of DDE. For ease of use this Policy uses the term 'staff' to include all of these persons.

It is important to note that this Policy continues to apply to 'staff' even after their relationship with DDE has ended.

It applies to personal data stored in any form. This can be electronic, paper, photographic and kept individually or as part of a database.

Responsibilities

Overall responsibility for data privacy rests with the Trustees who will ensure there are adequate controls are in place to ensure compliance.

All 'staff' are personally responsible for complying with GDPR and this Privacy Policy. They must ensure the information they have access to, handle, or share is processed lawfully, securely, and professionally.

In particular 'staff' must use personal data only for the agreed and intended purpose within DDE. They must not use this data for themselves nor share it with, nor give it to, any other person or organisation.

Any reckless or deliberate breach of this Policy will require appropriate action to control the risks, and may include criminal or civil action being taken if there is a resulting reputational or financial loss to DDE.

Advice on handling or sharing personal data should be sought from, or provided by, the supervising representative of DDE. In most cases this will be the Office Manager.

All 'staff' handling personal data must sign this Policy to show that they have agreed to, and will work in accordance with, this Policy before they are given access to any personal data held by DDE.

Further information on GDPR can be obtained from www.ico.gov.uk.

Policy content

GDPR provides six principles that govern the collection, management and use of personal data.

1. Processed lawfully, fairly and in a transparent manner.
2. Processed for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form that permits identification of data subjects for no longer than is necessary.
6. Processed in a manner that ensures appropriate security including protection against misuse, loss, destruction or damage.

DDE follows these principles and all 'staff' are expected to abide by them when handling and working with personal data.

1. Lawful, fair and transparent

The first principle requires DDE to be fair by being open and transparent with individuals about how their personal data is going to be collected, used, held, shared, processed etc. This is known as fair processing and DDE has explained this in its Privacy Notice (available on DDE website) that applies to all individuals engaging with DDE.

When collecting or handling personal data, 'staff' should tell individuals what will happen to their information, what it will be used for, and how long it will be held.

GDPR requires the individual or data subject to have given their consent to the processing of their personal data and it is important 'staff' ensure this is the case.

2. Specified, explicit and legitimate purposes

This principle requires DDE to process personal data for the purpose or purposes for which it was intended. The way in which DDE intends to use the data should be communicated to the individual, and 'staff' must ensure they use personal data in a way in which individuals providing their data would reasonably expect in accordance with the notice given.

3. Adequate, relevant, and limited

'Staff' should ensure that any personal data DDE holds and processes is adequate (fit for purpose), relevant and not excessive (not more than required for the specified purpose).

4. Accurate and up to date

'Staff' must take reasonable steps to ensure data is accurate and kept up to date. Data should be checked at regular intervals to ensure it is correct, and if found to be inaccurate steps taken to correct the information held. This may be as simple as putting a standard notice on all correspondence asking to notify DDE of any inaccuracies, or if data is inactive checking before updating or deleting. (Information relating to deceased persons must be deleted once DDE becomes aware of this fact).

Individuals have the right to see their personal data held by DDE. If 'staff' receive such a request it should be referred in the first instance to the office manager.

5. Kept for no longer than necessary

Personal data will be kept only as long as necessary to conduct and complete the purpose for which it is held. Once this has been completed the information must be deleted.

6. Security

Personal data will be stored in a secure manner and must not be shared with any third parties.

DDE will take steps to ensure that 'staff' with access to personal data have appropriate understanding of their responsibilities and necessary training prior to handling personal data. You will work with personal data on a 'need to know' basis when you carry out tasks for DDE.

If you become aware of a potential breach of data security you must notify one of the Trustees immediately.

Individual Rights

Any person we hold data on has a right to:

- Request a copy of personal data hold about them, though steps must be taken to confirm their identity.
- Request any inaccuracies to be corrected
- Request that their data is deleted from DDE records
- Seek redress for DDE failing to comply with GDPR through DDE's Complaints Process
- If not satisfied with DDE's response to contact the Information Commissioner's Office

If you are approached by anyone with concerns or questions about their personal data please refer this immediately to the Office Manager or one of the Trustees.

Transferring Data Overseas

Transferring personal data to a country outside the European Union is permitted only when the country has an adequate level of protection for rights and freedoms of data subjects. This may include emailing personal data abroad, or using online tools to broadcast emails, or collect personal information using online forms. If in doubt a Trustee should be consulted prior to any transfer of data overseas.

Registration

DDE was established as a charitable ‘not-for-profit making’ organisation. Where it makes a profit this is for its own purposes, and is not used to enrich others personally. Based on current information and business practice DDE does not have to register with the Information Commissioners Office (ICO).

However DDE understands that it must adhere to the principles of GDPR and apply best practice for managing personal information.

DDE may wish to voluntarily register with the ICO or review its practice from time to time to confirm its position.

Policy History

Protection of personal data was regulated formerly under the regulations and guidelines provided by the Data Protection Act 1998. DDE prepared its original Privacy Policy in July 2014. This was updated in October 2016 and that included self-reassessment of the need to register with the ICO, the result of which indicated that DDE did not need to register at that time.

This Policy was updated within the framework of GDPR and adopted by DDE in May 2018.

Declaration

I confirm that I have read, understood, and will adhere to Devon Development Education’s Privacy Policy.

Name	Signed	Date
