

# **BRIDGING THE GAP ISLINGTON DATA PROTECTION POLICY**

## **1. General principles**

Bridging the Gap Islington recognises that any user of our services, whether an individual or an organisation, has the right to expect that any information imparted by them to Bridging the Gap Islington will be used only for the purpose for which it is given and should not be released to anyone else outside Bridging the Gap Islington without the user's consent.

The right to privacy is essential to ensure trust and confidence in the organisation and that users of our service are treated with respect and dignity. Information about the internal affairs of Bridging the Gap Islington is also confidential.

Bridging the Gap Islington follows the eight principles of the General Data Protection Regulations as listed below: The principles specify that any data collected about our staff, volunteers or clients must be:

- a. Fair and lawful and transparent
- b. For specific purposes and only processed in ways compatible with those purposes
- c. Adequate, relevant and limited to what is necessary
- d. Accurate and
- e. Can be corrected or deleted according to the legal rights of data subjects
- f. Retained for no longer than necessary.
- g. Kept safely and protected from unauthorised alteration
- h. only processed in the European Union or in accordance with EU regulations

## **2. The information we hold**

Bridging the Gap Islington stores information about

- Service users
- Mentors
- Members
- Staff
- Donors

### **3. Basis for processing**

Our lawful basis for processing is our legitimate interest. The information is needed in order to arrange mentoring, to ensure that mentoring is safe and effective. We only keep the minimum amount of data necessary and use the data in ways that the subjects would expect.

Wherever practical, we ask consent for the use of data.

We keep special category data with consent in order to assess whether our services are useful to a wide range of people. When we ask for this data, subjects are clearly given the option of deciding not to provide it.

We keep information about criminal offences for our legitimate purposes in ensuring safe and effective mentoring. We have a lawful basis for asking for and keeping this information because we work with vulnerable adults..

### **4. Privacy Notice**

When we ask for information, we provide a clear, short notice of the purposes for which it will be used and we also provide access to a more detailed privacy notice on our website (Appendix A)

### **5. Data Retention**

In general, we keep information about an individual for two years following our last contact with them. The exceptions are:

We only keep information for six months after last contact for applicants who do not complete the application process or who do not become mentors or staff.

For mentoring partnerships, we keep all information (including information on mentor and service user) for 5 years after the end of mentoring and we keep basic information (names and summary information) for 10 years after the end of mentoring

Our insurer requires us to keep all information about training for 25 years

Financial information will be kept for 7 years as required by the Inland Revenue.

### **6. Correcting and deleting data**

As we are a small organisation we are confident that we will be able to comply with the GDPR requirements to

- Provide copies of information we hold to the subject of the information
- Correct any errors
- Erase information at the request of the subject (provided it is not needed for legal reasons)

### **7. Protecting Data**

Our records are kept in computer files on “Dropbox” and we believe that their security measures are adequate. All staff accessing our computer records are required to have password protection on their computers.

Paper records are kept in a locked filing drawer at in premises that are locked when not occupied.

#### **8. International transfers**

Our computer files are stored in Dropbox which is based in the United States. Dropbox complies with the EU-US Privacy shield requirements.

We do not otherwise transfer information outside the United Kingdom.

## **Appendix A**

### **Privacy Notice**

We ask for your information to meet our legitimate purpose of arranging mentoring partnerships. We keep the minimum necessary information for this purpose. We delete information two years after our last contact with you, except in certain circumstances. You have the right to see and to ask us to correct any information we hold about you. You can withdraw your consent for us to hold information about you. If you wish to do this, please contact Robin Latimer (robin@bridging-isington.org.uk) who is our data controller. We keep data on Dropbox which is based in the United States and complies with E.U.-U.S. privacy shield requirements.

For more detail on how your information is treated, please see our data protection policy ([link to policy](#))

If you are unhappy with the way we have handled information about you, you have the right to complain to the Information Commissioners Office.

In addition all information gained via the Criminal Records Bureau relating to staff or volunteers will be confidential to the registered person[s] or the designated contact person at Bridging the Gap Islington.

Information about current staff, volunteers and service users will be stored in accordance with the provisions of the Data Protection legislation and associated guidance. Where there is a business need to retain records on people who are no longer involved with Bridging the Gap Islington [for example, in case of requests for references, or in relation to taxation] this will be kept no longer than is necessary and in accordance with DP guidance.

#### Protecting our data

Our records are kept in computer files on “Dropbox” and we believe that their security measures are adequate. All staff accessing our computer records are required to have password protection on their computers.

Paper records are kept in a locked filing drawer at Cranstoun Recovery in premises that are locked when not occupied.

The designated contact person at Bridging the Gap Islington with regards to queries about Data Protection is Robin Latimer

#### **Address for questions about data**

The official address of Bridging the Gap Islington is 33 Tollington Way, London N7 6RG

We can be contacted by email at [admin@bridging-islington.org.uk](mailto:admin@bridging-islington.org.uk) and by telephone on 07956440309.

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Version 1

Previously combined with Confidentiality policy

APS Key area 1