

DATA PROTECTION POLICY



SLT (SLT) is aware that it needs to actively manage how it handles personal and sensitive information that it receives.

This Policy sets out how SLT will ensure that it maintains confidentiality as appropriate and in accordance with the General Data Protection Regulation, May 2018.

Definitions

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| GDPR | means the General Data Protection Regulation, May 2018 |
| Responsible Person | means CEO Mette Ohrvik. |
| Register of Systems | means a register of all systems or contexts in which personal data is processed by the Charity. |

Key aims

SLT wishes to create an environment where people feel confident and able to discuss and share sensitive information. The aims of this Policy are to ensure that:

- All information held is appropriately recorded, stored and used
- That all staff, volunteers and clients are aware of the requirements of this Policy and are aware of their responsibilities and rights within it.

Data protection principles

SLT is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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 not be considered to be incompatible with the initial 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; 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;
 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 subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
 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.”

1. General provisions

- a. This policy applies to all personal data processed by SLT.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. SLT is not required to register with the Information Commissioner's Office as an organisation that processes personal data.

2. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, SLT shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least bi-annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

3. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate.
- b. SLT notes the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately.

4. Data minimisation

- a. SLT shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Client data, when used in general communications such as emails to counsellors and room calendars, use anonymous client codes, first names or initials only.
- c. Data on client files include a log of client contact, a completed initial assessment form,

client journey assessment forms, minimal counsellor notes, review call logs, any materials produced by the client that they wish to be kept in their file, client consent form and copies of other communications including emails and letters.

5. Accuracy

- a. SLT shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date. This generally occurs during quarterly review calls to clients or on an ad hoc basis with active clients, staff and volunteers.

6. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, SLT has an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy considers what data should/must be retained, for how long, and why.

Security

- a. SLT securely stores personal data using modern software (Microsoft 365) that is kept-up-to-date. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information. A clear desk policy is maintained and staff should lock computers when away from their desks.
- b. Hard copies of personal information including staff, volunteer and client files are locked away in fire-resistant filing cabinets when no staff are on the premises.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable. Hard copies of client files and other sensitive and identifying information are securely destroyed.
- d. Appropriate back-up and disaster recovery solutions are in place. Key data including the current client spreadsheets are backed up weekly and stored securely.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, SLT shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Related policies:

- Data Protection procedures and guidelines
- Information Sharing procedures and guidelines
- Safeguarding Policy
- Archiving Policy
- Privacy Policy