

PATCHWORKING AGAINST POVERTY

Registered Charity 1149806

Data Protection Policy

This policy applies to all trustees, volunteers and sessional workers, agency staff, students or any individual or organisation working on behalf of Patchworking Against Poverty (P.A.P.).

The purpose of this policy:

- to ensure person identifiable data is controlled and processed in a manner which respects individual rights and our legal obligations
- to provide staff and volunteers with the overarching principles that guide our approach to data protection.

We will seek to keep personal data secure and accurate by:

Awareness

- Ensuring all trustees and volunteers are aware of the need to protect personal identifiable data
- Appointing a trustee with specific responsibility for Data Protection

Information we hold

- We will maintain a personal identifiable data (PID) register
- Only personal identifiable data (PID) necessary to P.A.P. to carry out its activities as defined in the charity's objectives will be held. This will include data on the following subjects
 - Patients (attending P.A.P. medical camps & clinics)
 - Children (recipients of sponsored support through charity)
 - Other charity service recipients
 - Volunteers
 - Donors
 - Trustees
 - Overseas Staff & volunteers
 - Others

Communicating privacy

- We will publish a data privacy statement on our website
- We will display/publish a data privacy statement at our (public) medical camps

Individuals rights

- Subject access requests will be responded to with information in a format accessible to the subject
- Individuals have the right to request information we hold is amended or deleted
- Individuals have the right to restrict how P.A.P. processes their data
- We will respond to Individual requests within the required timescales

Subject Access Requests

- We will respond to Subject Access requests in the UK for data which we hold in accordance with the timescales and requirements of the EU GDPR and UP Data Protection Act

Lawful basis for processing personal data

- Person Identifiable Data will only be processed by P.A.P. where there is a legitimate reason to access the data in carrying out the defined objectives of the charity.

Specifically

- Patient Data is processed on the basis of consent
- Donor Data is processed on the basis of consent
- Volunteer Data is processed on the basis of Agreement (Contract)

Consent

- UK Donors give consent to P.A.P. to hold and process their data as part of the donation registration
- Patients attending medical camps (overseas) give implicit consent to P.A.P. to hold and process their data for the purposes of direct care as part of the registration process

Children

- P.A.P. does not offer any online services to children.

Data Breaches

- Any data breach (or suspected breach) will be referred to the Data Protection Lead (trustee) who will be responsible for investigating the breach/potential breach and if required reporting to the Information Commissioner Office (ICO) as required under GDPR.
- Risk assessments will include an assessment of the risk of data breaches

Data protection by design and Data protection impact assessments

- Recording and storing information professionally and securely
- Maintaining a personal identifiable data (PID) register
- No automated decision making (including profiling) based on individual's data will be carried out.

Data Protection Officer

- A Data protection officer (DPO) is not required to be assigned

Registration

Patient identifiable data is held in paper format. All data processed is for not-for-profit purposes. P.A.P. is therefore exempt from registering for payment of a data protection fee with the Information Commissioners Office (ICO).

International

- As PAP does not operate in any EU states other than the UK the lead data protection authority will be the UK Information Commissioners Office (ICO).

- When carrying out activities in overseas (non-EU) countries P.A.P. will take all reasonable steps to ensure compliance with the current effective laws and regulations of that country.

General

- Providing effective management for volunteers through supervision, support, training and quality assurance measures
- Complying with Freedom of Information requests
- Ensuring we have effective complaints and whistleblowing measures in place

Record Retention & Disposal

- During medical camps held in the field (Kenya) a paper based patient record will be created for the purpose of the management of treatment given during the duration of the medical camp. These records will be held (processed) by P.A.P. only for the duration of the medical camp project for the purposes of direct care and will be transferred to the relevant Ministry of Health (Kenya) local clinic at the end of the project.
- Non identifiable data will be transferred prior to this to the project audit log for the purposes of preparing an audit report on the project for the Ministry of Health (Kenya). This will contain no personal identifiable data.
- Where individual patients require further interventions or referral records will be held for the time required to complete the intervention / referral and for a further six months.
- Volunteer personal identifiable data (including next of kin details) will be held for the duration of the project the volunteer is assigned to and for a further six months.

Legal Framework

The policy has been drawn up on the basis of law and guidance, applicable within the UK, that seeks to protect children, namely:

- Data Protection Act 1998
- EU General Data Protection Regulations (GDPR) 2016 (UK enforceable May 2018)
- Computer misuse act 1990
- Human Rights Act 1998

This policy should be read alongside all other Patchworking Against Poverty Policies

Working overseas

When carrying out activities in overseas (non-EU) countries P.A.P. will take all reasonable steps to ensure compliance with the current effective laws and regulations of that country.

Contact Details

Data Protection Lead (trustee)

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We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on 30 May 2018

Signed : *Laura Scott*

(Chair of board of trustees)