ELIZABETH HOUSE
Highbury Vale Blackstock Trust

Data Protection Policy

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Data Protection Policy

1. Aim

The Highbury Vale Blackstock Trust (Elizabeth House) needs to keep certain information on its employees, volunteers, donors, suppliers and service members to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulation (GDPR).

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers all team members and volunteers at Elizabeth House.

2. Definitions

For data to be classified under 'Personal Data'; it must:

1. Be data (so not unrecorded conversations with members, donors or visitors)
2. Be personal (data is personal if it is concerned with identifiable, living individuals. It does not matter whether this data was processed automatically, electronically or manually).

For data to be classified as sensitive personal data; it must fall into the following categories:

1. The ethnic origin of the person
2. The person's political opinions;
3. The person's religious beliefs or beliefs of a similar nature;
4. Whether the subject is a member of a trade union;
5. Information on the person's physical or mental health condition;
6. Information on the person's sexual life;
7. The commission or alleged commission of an offence by the data subject;
8. Information relating to the commission or alleged commission of an offence by the data subject.

3. Responsibilities

Overall responsibility for personal data rests with the governing body. In the case of the Highbury Vale Blackstock Trust, this is the Board of Trustees. The Board should appoint a Data Protection Officer among the Trustees based on their professional qualities and expert knowledge of data protection law and practices. The governing body can also delegates tasks to the Data Protection Lead who is the CEO. They are responsible for:

- understanding and communicating obligations
- identifying potential problem areas or risks
- producing clear and effective procedures

- notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes

All team members and volunteers who process personal information must ensure they not only understand, but also act in line with this policy and the data protection principles.

Breach of this policy will result in disciplinary action.

4. Notification to the Information Commissioner

The needs we have for processing personal data are recorded on the public register maintained by the Information Commissioner. We notify and renew our notification on an annual basis as the law requires. If there are any interim changes, these will be notified to the Information Commissioner within 28 days.

5. Principles

The Highbury Vale Blackstock Trust will use the following principles with regards to personal data. 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;
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;
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.

Valid reasons for processing data include:

- The individual whom the personal data is about has consented to the processing;
- The processing is necessary: in relation to a contract which the individual has entered into; or because the individual has asked for something to be done so they can enter into a contract;
- The processing is necessary because of a legal obligation;
- The processing is necessary to protect the individual's "vital interests";
- The processing is necessary for administering a service, or for exercising statutory, governmental, or other public functions;
- The processing is in accordance with the "legitimate interests" condition.

6. Types of information processed

An information audit reveals that the Highbury Vale Blackstock Trust processes the following personal information:

Type of information	Details
Job applicants	Information about job applicants.
Employees' information	Contractual information and personnel files, including payroll details, tax and national insurance information, job duties, performance and training records, details of any disciplinary and grievance procedures, health records. CCTV footage when working in facilities. Card entry system
Volunteer information	Volunteer records, including personal contact details. CCTV footage when present in facilities.
Service users	Contact details and personal details when relevant for type of services. Contact details when booking services online (website). CCTV footage when visiting facilities.
Partner organisations	Contact details, financial and governance information required for funding applications
Donors	Donor details including donation(s) and support provided. Names, contact details and donation amounts on CAF Donate platform.
Supplier	Supplier details including email addresses or contact information of those that are providing goods or services . CCTV footage when visiting facilities.

7. Data register

The Data Protection Lead will maintain an up-to-date data register that provides details on personal data processed by the Highbury Vale Blackstock Trust, why it is being processed, the categories of individuals and categories of personal data and retention schedules.

8. Lawful basis for processing

The data register will state the lawful basis for the processing of personal data.

Where information is processed in accordance with the consent of the individual we will require properly documented, subject specific, granular, clear, prominent opt-ins which can be easily withdrawn.

Where information is processed in accordance with the Legitimate Purposes of the organisation, we will complete a Legitimate Interest Assessment (LIA). This comprises three steps: 1. The assessment of whether a legitimate interest exists; 2. The establishment of the necessity of processing; and 3. Undertaking a balance of interests test.

Children under 16 cannot give consent. We will seek consent from a parent or guardian and will verify that the person giving consent on behalf of a child is allowed to do so.

9. Data Security

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure.

The following measures will be taken:

- Using lockable cupboards (with restricted access to keys)
- Password protection on personal information files
- Setting up computer systems to allow restricted access to certain areas
- Back up of data on computers (onto a server/the cloud off site)

Sensitive personal information will be stored using additional security measures and will never be shared over email.

10. Suppliers

If the Highbury Vale Blackstock Trust decides to use an organisation to process data on our behalf we will:

- Select a reputable organisation offering suitable guarantees as to their ability to ensure the security of personal data.
- Ensure the organisation has appropriate data security measures in place.
- Ensure the processor makes and has made appropriate security checks on its staff.
- Ensure the contract is enforceable in the UK
- Require the processor to report any security breaches or other problems (including requests for personal data)
- Have procedures in place to allow The Highbury Vale Blackstock Trust to act appropriately on receipt of security or problem reports from the processor.

11. Data protection by design

We will carry out a Data protection impact assessment when:

- using new technologies; or
- using special category data to decide access to services; or
- processing is likely to result in a high risk to the rights and freedoms of individuals, for example large scale, systematic monitoring of public areas (CCTV).

Each DPIA will contain:

- A description of the processing operations and the purposes, including, where applicable, the legitimate interests pursued by the controller.
- An assessment of the necessity and proportionality of the processing in relation to the purpose.
- An assessment of the risks to individuals.
- The measures in place to address risk, including security and to demonstrate that how we comply.

12. Training

All appropriate employees will be trained and informed of their personal liabilities and the liabilities of the Highbury Vale Blackstock Trust under the GDPR. Employees are informed of the possibility that they may commit a criminal offence if they deliberately try to access, or to disclose, information without authority, and they will also be subject to disciplinary procedures, including dismissal where appropriate.

13. Procedure for assisting the authority in responding to Freedom of Information requests

We will not provide personal information to private companies or government bodies other than that which we may be legally required to provide. We are required to share information outside the service in the rare event that we think that an adult or child is at imminent risk of significant harm, as defined under our Child Safeguarding and Adult Safeguarding Policies.

Statutory authorities and other public bodies are required to respond to requests under the Freedom of Information (FOI) Act 2000. In some cases the Highbury Vale Blackstock Trust may hold relevant information and be approached by the statutory authority for information.

The Highbury Vale Blackstock Trust will require full details from the statutory authority about the nature of the request and the information required, in order to make a decision about whether or not The Highbury Vale Blackstock Trust is willing to provide the information.

Requests should be made by the statutory authority to the CEO. Decisions about whether or not to disclose will be made within 3 working days and the relevant information passed on (if appropriate) within 10 working days of the request being made.

Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary action.

14. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:
Highbury Vale Blackstock Trust, Elizabeth House, 2 Hurlock Street, London N5 1 ED
Email director@elizabeth-house.org.uk
Tel. 020 7690 1300
The Data Protection Officer is Mr Andrew Baxter.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk

15. Procedure in case of a breach

When a breach of data protection occurs the Data Protection lead will report the breach to the Information Commissioner within 72 hours and/or to any partners with which we hold Information Sharing or Partnership Agreements

If a breach is likely to result in a high risk (e.g. criminal activity such as fraud, or published in the public domain) to the rights and freedoms of individuals then the Data Protection lead will also notify those concerned and the Charity Commission.

16. Subject access requests and individual rights

Anyone whose personal information we process has the following rights:

- Right to be informed;
- Right of access;
- Right of rectification;
- Right to erasure;
- Right to restrict processing;
- Right to data portability;
- Right to object;
- Right not to be subject to automated decision making including profiling

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, send a description of the information you want to see by post to Highbury Vale Blackstock Trust, Elizabeth House, 2 Hurlock Street, London N5 1 ED, or by email to administrator@elizabeth-house.org.uk

We may make a charge of £10 on each occasion access is requested.

The following information will be required before access is granted:

- Full name and contact details of the person making the request
- their relationship with the organisation

We may also require proof of identity before access is granted.
Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within a month of receiving the written request and relevant fee.

Information will be presented in clear and plain language, in an intelligible and accessible form.

Signed:

Nathalie Renaud
CEO, Highbury Vale Blackstock Trust

Reviewers:
Iqbal Ali, Deputy Centre Manager
Trustees

Policy Changes Tracking

Review date	Next review date
April 2026	April 2027