



Empowering Young People

Data Protection Policy

November 2020

1.0 POLICY STATEMENT

HYP is committed to providing safe environment for service users and workers. HYP recognises that trust is essential for good youth work and is the foundation of relationships within HYP.

Maintaining confidences is an integral part of building trust between young people and workers. This will be respected at all times; apart from where it conflicts with reporting child protection/Safeguarding concerns. (Please refer to Safeguarding policy).

1.2 Who

This policy applies to all employees of HYP, irrespective of length of service and whether permanent, temporary, casual, part-time or on fixed-term contracts, trustees, management committee members, volunteers and the HYP community as a whole.

HYP reserve the right to amend this policy and the procedures contained within it as it sees fit or apply a different policy as appropriate.

All members of the HYP community should be mindful of our policies. Policies will be accessible from the HYP office and online.

The HYP community includes all staff members, trustees, members of the management committee, young people, parents/carers and visitors.

The HYP team is committed to ensuring that staff have access to regular and appropriate training to support the health & welfare of the children, young people and their colleagues.

2.0 DATA PROTECTION GDPR

HYP uses personal data about living individuals for the purpose of charity organisation, administration, and communication. HYP recognises the importance of the correct and lawful treatment of personal data.

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All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation 2018 (GDPR).

HYP fully endorses and adheres to the eight principles of the GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation, and storage of personal data. Employees and any others who obtain, handle, process, transport, and store personal data for HYP must adhere to these principles.

The Principles

The principles require that personal data shall:

- Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and where necessary, kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
- Not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

2.1 Maintaining Confidentiality

HYP will treat all your personal information as private and confidential and not disclose any data about you to anyone other than those working in and for the charity in order to facilitate the administration and day-to-day activity of the charity.





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All the HYP staff and volunteers who have access to personal data will be required to agree to sign a confidentiality policy and a data protection policy. There are four exceptional circumstances to the above permitted by law:

- Where we are legally compelled to do so.
- Where there is a duty to the public to disclose.
- Where disclosure is required to protect your interest.
- Where disclosure is made at your request or with your consent.

2.2 Use of Personal Information

HYP will use your data for three main purposes:

- The day-to-day administration of the charity; e.g. organising visits from referrals, communicating about session times and dates and maintaining financial records for audit and tax purposes.
- Contacting you to keep you informed of HYP activities, services and events.
- Statistical analysis; gaining a better understanding of HYP's users demographics.

(Although collated charity data may be passed to a third party, such as localities, program engagement or age of users, no personal data will be disclosed and all reasonable steps to anonymise data will be taken.)

2.3 How and Where Data is stored

All HYP laptops and computers are password protected.

Young people

- Referrals, consent forms and reports are stored electronically on the NAS drive which is a secure network which can be accessed from within the HYP office. The network is password protected and all HYP workers know where to save this data.
- On HYP laptops workers are required to only store sensitive data on an external hard drive which is password protected with security on.
- Young people's data is kept and stored for 5 years, after this it is discarded appropriately.



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- When a young persons data needs to be shared (ie disclosure forms or reports) these are sent via Egress. This is a password protected email system which only allows the recipient access via a password.

Workers

- HYP employees data is stored in a locked filing cabinet and also on the NAS drive.
- information is kept for 5 years and discarded appropriately after this time.

2.4 Rights to Access Information

Employees and other subjects of personal data held by HYP have the right to access any personal data that is being held in certain manual filing systems. This right is subject to certain exemptions:

- Personal information may be withheld if the information relates to another individual.

Any person who wishes to exercise this right should make the request in writing to HYP data officer, using the standard letter which is available online from www.ico.gov.uk If personal details are inaccurate, they can be amended upon request.

HYP aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

3.0 Young People

HYP is committed to ensuring that young people are able to share information with youth workers in a confidential manner.

Young people can expect that any information they give to a worker is treated confidential and will not be shared unless:

- The worker believes that the young person, or another young person is in danger or is being harmed. In this case a person will be told that information will be passed on to the appropriate agencies and encouraged to agree with this.
- The young person discloses that they were involved or plan to become involved in acts of terrorism or acts against the law.

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3.1 Workers

All workers at HYP are expected to uphold the projects commitments to confidentiality. Workers are expected too:

- Keep records, files and documents stored in a safe and secure manner.
- Not discuss any information given by a young person in confidence, unless they have a child protection concern or the young person gives their permission.
- Tell a young person when information can not be kept confidential (i.e a child protection concerns).
- Encourage a young person to talk to people (Parents/guardians) where they feel it's in the persons best interest.

Workers can expect the organisation to:

- Provide them with training on GDPR
- Ensure that suitable means of storing confidential documents is given
- Ensure that their own information (eg medical or emergency contact details) are stored securely and is kept confidential and only seen by colleagues in relation to their role.
- Safely destroy personal information when the worker ceases to work for the organisation
- Take disciplinary action where the Confidentiality Policy is not upheld (unless due to a child protection concerns or a court order has been issued).

Parents/Guardians

- Parents/Guardians of young people attending HYP can expect that the information they provide HYP with (ie medical, contact information) will:
 - o Be kept in a secure, confidential manner and only used for the purpose provided
 - o Enable to organisations to ensure parents receive information that is necessary.
 - o Not be sold
 - o Will not show to organisations without prior consent.

For general enquiries about the HYP's Data Protection Policy please contact one of our data protection officers:

Project Manager

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