

Data protection privacy policy

1. Introduction

intu needs to collect and use certain types of information about the individuals or service users who come into contact with intu in order to carry on our work. This personal information must be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the General Data Protection Regulation.

2. Data controller

intu is the data controller under the GDPR, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

3. Data collection

intu regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

intu intends to ensure that personal information is treated lawfully and fairly.

To this end, intu will adhere to the Principles of Data Protection, as detailed in the GDPR.

Specifically, the principles require that personal information:

“processed lawfully, fairly and in a transparent manner in relation to individuals;

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;

adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

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;

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

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.”

intu will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet its legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements.
- Ensure the quality of information used.
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken.
 - The right of access to one’s personal information.
 - The right to prevent processing in certain circumstances.
 - The right to correct, rectify, block or erase information which is regarded as wrong information.
 - The right to be forgotten, in certain circumstances.
 - The right to have data transferred to a third party.
- Take appropriate technical and organisational security measures to safeguard personal information.
- Ensure that personal information is not transferred outside the EU without suitable safeguards.
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- Set out clear procedures for responding to requests for information.

4. Disclosure

intu may share data with other agencies such as the local authority, police forces, other enforcement agencies, insurance providers and other service providers as required.

The data subjects will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows intu to disclose data (including sensitive data) without the data subject's consent.

These are:

- Carrying out a legal duty or as authorised by the Secretary of State.
- Protecting vital interests of an individual/service user or other person.
- The individual/service user has already made the information public.
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
- Monitoring for equal opportunities purposes – i.e. race, disability or religion.
- Providing a confidential service where the individual/service user's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill individuals/service users to provide consent signatures.

5. Data storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff or other authorised persons.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is intu responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

6. Data access and accuracy

All individuals/service users have the right to access the information intu holds about them. intu will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, intu will ensure that:

- It has a data protection officer with specific responsibility for ensuring compliance with data protection.
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- It deals promptly and courteously with any enquiries about handling personal information.
- It describes clearly how it handles personal information.
- It will regularly review and audit the ways it hold, manage and use personal information.
- It regularly assesses and evaluates its methods and performance in relation to handling personal information.
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection legislation.

In case of any queries or questions in relation to this policy please contact the intu data protection officer:

Mike Davies
Data Protection Officer
Data.protection@intu.co.uk

Signature:



Date:

28 MARCH 2019

Next review date:

MARCH 2020

Glossary of terms

Data controller (business support managers)

The person who (either alone or with others) decides what personal information intu will hold and how it will be held or used.

General Data Protection Regulation

The EU legislation that provides a framework for responsible behaviour by those using personal information.

Data protection officer

The person(s) responsible for ensuring that intu follows its data protection policy and complies with the GDPR.

Individual/service user

The person whose personal information is being held or processed by intu for example: a client, a customer, an employee, or supporter.

Explicit consent

Is a freely given, specific and informed agreement by an individual/service user in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Notification

Notifying the Information Commissioner about the data processing activities of intu, as certain activities may be exempt from notification.

Information Commissioner

The UK Information Commissioner responsible for implementing and overseeing the General Data Protection Regulation

Processing

Means collecting, amending, handling, storing or disclosing personal information.

Personal information

Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within the group.

Special categories of data (Sensitive data) – refers to data about:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation.”