



Data Protection Policy

This Policy applies to all Directors, volunteers and other therapists or professionals SEN-den works with to deliver services to families.

1. Introduction:

This is the Data Protection Policy for SEN-den (play, info, support) CIC

Address: The Lancaster Centre, 53 Lancaster Road, Enfield, EN2 0BU

Company no. 12164083

Founder and Director: Lubna Reid

2. Governing legislation

General Data Protection Regulation 2016 (GDPR)

Data Protection Act 2018 (DPA)

3. Key Definitions:

Confidentiality

Confidential information is defined as verbal or written information, which is not meant for public or general knowledge, information that is regarded as personal by users, members, Directors, volunteers, therapists, and professionals that SEN-den works with.

Consent

Provision of consent by of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data

Data are pieces of information relating to a person or a 'Data Subject' that could identify them, that is stored:

- a) Electronically i.e. on computer, including word processing documents, emails, computer records, CCTV images, microfilmed documents, backed up files or databases, faxes and information recorded on telephone logging systems.
- b) Manually i.e. records which are structured, accessible and form part of a filing system where individuals can be identified and personal data easily accessed without the need to trawl through a file.

Data Controller

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

Data Processor

A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Controller.

Data Subject

Any living individual whose personal data is being processed (including volunteers).

Information Commissioner's Office (ICO)

The ICO, headed by the Information Commissioner, is responsible for upholding the data privacy of individuals in the UK, supporting best practice in data protection, and managing reports of serious data breaches: www.ico.org.uk.

SEN-den is registered with the ICO: ZA794647

Processing

Processing means any use of personal data including collection, recording, storage, adaptation or alteration, retrieval, consultation, disclosure or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Protection Officer

The person responsible in our organisation for ensuring that we follow our data protection policy and complies with the General Data Protection Regulation.

Lubna Reid

4. Policy Statement:

SEN-den collects and uses the personal information provided by families that register with us and participate in our services.

We routinely collect the following information:

Parent: Name, gender, home address, email address, mobile number, any additional languages spoken

Children: Name, date of birth, gender, pre- or post- diagnosis, nursery or school attendance, specialist autism services received or requested, siblings, allergies we should be aware of.

We collect further detailed information from parents opting into our counselling and massage therapy services, such as date of birth, medical history, and GP details.

We collect and use personal information to:

- keep in touch with families that have joined the SEN-den community of support.
- make introductions between families (*gaining explicit consent beforehand*).
- invite families to take part in our play, information, and support activities.
- introduce families to autism practitioners, therapists, and other professionals.
- provide detailed feedback and case studies to statutory service providers.
- safeguard families who may find themselves at risk of harm (parents and children).

This Policy applies to the control and processing of all such personal information.

We commit to upholding the seven principles laid out in GDPR, that personal information be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
- 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, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation').
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').
- 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 ('accuracy').
- 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 in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by

this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation').

- 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 ('integrity and confidentiality').

In addition, we will:

- comply with the DPA, GDPR and Information Commissioner's Office (ICO) guidance in respect of the data we hold about individuals, respecting data subjects' rights.
- be open and honest with potential data subjects about how their personal information is, or will be, being held.
- foster a culture in which those involved in our organisation take data protection practices seriously and treat data subjects' personal information with care and respect.
- ensure those involved in our organisation receive any training and supervision necessary to their roles.
- review and revise our data protection processes, and this Policy, as necessary.

5. Responsibilities & Contact Details

Overall and final responsibility for data protection rests with SEN-den's Management Committee. Our nominated Director with specific responsibility is **Victoria Aseervatham**.

Day-to-day responsibility for data protection, and for queries relating to this Policy, rests with the Data Protection Officer, who is currently **Lubna Reid**.

Lubna can be contacted by email: lubna@sen-den.org.uk

6. Consent

In accordance with this Policy, we will ensure that consent is obtained at all times for the purposes of processing data subjects' personal information. We will also make clear to our data subjects what the purposes of collecting their data are.

7. Access to Data

Should a data subject request access to the information stored about them; should they wish for their information to be erased; or to make any other requests under GDPR, the Data Protection Officer shall ensure the request is handled without delay, and in any case within one calendar month of receiving the request.

8. Data Security

We will ensure that the personal information we process is:

- protected by the use of passwords if kept on computers and/or other devices.
- stored in secure rooms, using locked drawers or cabinets, or if electronically, secure digital storage.
- treated confidentially, ensuring consent is further obtained from the data subject if the organisation wishes to process their personal information in a new or different way, unless the processing is required by law.
- destroyed confidentially if it no longer needed, or if an individual requests, e.g. by shredding.

9. Data Breaches & Reporting

All staff, trustees and volunteers are required to report any data breach to the Data Protection Officer as soon as possible. A data breach means a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, data processed by the organisation.

The Data Controller is responsible for recording and reporting any data breaches that occur across the organisation.

Less serious breaches will be recorded in an appropriate place, ensuring changes are made to this Policy and to every-day processes where necessary.

Serious personal data breaches will be reported by the Data Protection Officer to the Management Committee at the earliest possible opportunity, as well as being reported to the ICO within 72 hours of the breach occurring if possible, and if not, informing the ICO the reasons for any delay.

SEN-den is registered with the Information Commissioner's Office: ZA794647

Certificate

Organisation Name:

SEN-den (play info support) CIC

Reference number:

ZA794647

Tier:

Tier 1

Start date:

11 October 2020

End date:

10 October 2021

Data Protection Officer