

South Wight Area Youth Partnership

Data Protection Policy

Definitions

Organisation	means South Wight Area Youth Partnership (SWAY), Charity Registered No. 1160139
DPA	means the Data Protection Act 2018 and UK GDPR which implements the General Data Protection Regulation implemented in the UK in May 2018 and January 2021.
Responsible Person	means Jo Richards as Processing Controller. The SWAY Administrator as processor.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the SWAY.

1. Data protection principles

The Organisation is committed to processing data in accordance with its responsibilities under the DPA.

DPA requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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 DPA in order to safeguard the rights and freedoms of individuals; and

- f. 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.”

2. General provisions

- a. This policy applies to all personal data processed by the Organisation.
- b. The Responsible Person shall take responsibility for the Organisation’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Organisation shall register with the Information Commissioner’s Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Organisation shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Organisation shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the Organisation must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data eg registration/membership forms.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Organisation’s systems. Each electronic mail provides the option to unsubscribe.
- d. The data are used primarily as a vehicle for disseminating information about SWAY and its activities to members, supporters or for staff and volunteers
- e. The membership application form specifically asks members to consent for photographs to be taken and used by SWAY.

5. Data minimisation

- a. The Organisation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Examples include a person’s name, address, phone number, email address, photograph or video recording.
- c. Images will only be taken with consent from the individual or parent with consent to be used in eg company newsletter publications or for funders publicity.

- d. Data processing may be required for eg HR and procurement.

6. Accuracy

- a. The Organisation shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Organisation has in place an archiving procedure for each area in which personal data is processed and review this process annually. There will be an annual review of the personal data held, and erasure or anonymisation when it is no longer needed.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.
- c. A member who fails to renew their membership is kept on the membership database for one further year and continues to be sent newsletters and/or notification of invites to events during that time as appropriate.
- d. If a supporter or member fails to renew their membership after this further year, their data is removed from the database to an archive list. All paper copies of membership are archived for 2 further years after which they are shredded.
- e. Data is retained for as long as an individual remains a volunteer or employee for the local initiative and for 6 years after their role ceases.

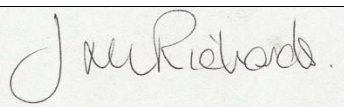
8. Security

- a. The Organisation shall ensure that personal data is stored securely using modern software that is kept up-to-date. All paper registration forms will be kept in a locked file.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. For more sensitive personal data there is more protection eg medical requirements, dates of birth, addresses, DBS confidential information. Password protection will be used to access computers and mobile phones.
- d. From time to time, it might be necessary to share the personal data of one member of SWAY with another in order, for example, to arrange transport to an event of one member by another. This will not, however, be done, without the agreement of the member concerned.
- e. Elements of the personal data of individual members (name and bank details) are shared automatically with the SWAY's bankers (HSBC Bank) when donations are made by cheque.
- f. When personal data is deleted, this should be done safely such that the data is irrecoverable.
- g. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Organisation shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

SWAY- Data Protection Policy

Date approved	23 rd April 2025
Date reviewed	April 2025
Signed	
Minuted	
Date of next review	April 2026