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This policy exists to ensure that DDCA: (a) complies with data protection law and follows good practice; (b) is clear why we seek personal information; (c) protects the rights of families, children and young people, staff and volunteers; (d) is open about how we store and process individuals' data; (e) protects everyone from data breach risks.

This policy is written in accordance with current data protection legislation and will be reviewed annually and amended when necessary. We will inform anyone whose data we process of any changes and seek consent again if required. Our separate "Secure Handling, Use and Retention" policy relates to our Protecting Vulnerable Groups Scheme Membership applications. We ensure that personal information is collected and used fairly, stored safely, and not disclosed unlawfully.

Dundee Disabled Children's Association (DDCA) needs to gather the following information for the following reasons:

- Personal information about children and young people keen to attend our groups so we can decide if any group we run currently or in the future would be suitable and that we can safely meet their needs.
- Personal information about children and young people attending our evening groups so we can prepare "all about me" folders to ensure we can provide the highest standard of care.
- Personal information about potential staff and volunteers so we can make a recruitment decision and apply for PVG scheme membership. We are fully compliant with all the requirements of Volunteer Scotland and Disclosure Scotland and underwent a support & compliance audit in 2018 to verify this.
- Contact details of families, volunteers and staff who attend our services so we can keep in touch with them and/or contact them or their nominated contacts in the event of an emergency and/or disruption to our services. We will ask to be informed of any changes and seek updates annually.
- We will not use the data collected for any other purpose.
- We request the names and addresses of any individual who donates to DDCA. This information is only used for the purposes of receiving Gift Aid, and for writing to thank the supporter. We do not use this information for any other purpose. We do not share this information with any third party. We do not "cold call" or contact people who have supported us in any other way.

Our lawful reasons for requesting & retaining personal information is "legitimate interest" (mainly for families and volunteers) and "contract" (for staff). We feel these are appropriate lawful reasons because we need this personal information to (a) provide care, (b) contact and update young people, families, volunteers and staff for the reasons above and other reasons that directly relate to the provision of our services, and (c) make recruitment decisions. "[We] use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing." (ICO website). We have carried out a "legitimate interest assessment (LIA)".

Addressing data protection risks:

We will ensure that personal information is not shared with anyone except those who lawfully require access. Personal data will not be shared with any third party.

Responsibility:

Everyone who works for DDCA has some responsibility for ensuring that data is collected, stored and handled properly. The only people able to access data covered by this policy will be those who need it to carry out their duties. Data will not be shared informally. DDCA will provide relevant training to staff and volunteers.

## Data storage:

Data stored on paper will be kept in DDCA's office where unauthorised people cannot see it.

DDCA volunteers and staff need to access our young people's "All about me" folders to ensure they are cared for appropriately and to a high standard. Volunteer and staff personal information will be kept in a filing cabinet in DDCA's office.

Staff and volunteers should make sure that paper and printouts containing personal data are not left where unauthorised people can see them. Personal information required for our residential holiday will be gathered in and destroyed after the trip.

When data is stored electronically, it will be protected by strong passwords. Any data stored on removable media will be kept securely when not being used.

DDCA operates CCTV both outside and inside our premises for crime detection and prevention purposes. The images are stored on a hard drive and recorded over on a three-week loop. Access to these images is password protected and will only be accessed for crime prevention and detection purposes. We are aware that our internal CCTV recording also provides families with extra "peace of mind" regarding the care of their children. This is in line with our culture of openness and accountability. DDCA is registered with the "Information Commissioner's Office".

All individuals who are the subject of personal data held by DDCA are entitled to ask what information we hold and why; request to gain access to it; be informed how to keep it up to date; be informed of how we are meeting our data protection obligations. You can request this at any time by contacting DDCA on 01382 826888. We will provide families, volunteers and staff with this information as soon as possible but always within one calendar month of receiving the request.

Personal information that is no longer required will be disposed of by shredding.

We will not keep any personal information for longer than required. All personal information will be shredded when a young person, volunteer or member of staff leaves DDCA. We acknowledge that everyone has the "right to be forgotten".

## Photos and videos

We only use photographs and videos of young people, staff and volunteers for display in our premises to establish and emphasise their "sense of ownership" in our service. Displaying photographs in our premises contributes to evidencing our commitment to meeting the published care standards. We also share videos and photographs of children and young people with their own families via secure means. Further consent is sought for press photographs (usually involving donation presentations). DDCA operates a strict social media policy. No video, image or voice recording of children or young people will be shared via any volunteer or staff member's personal or other social media. DDCA uses its own device for photographs and videos which is securely stored. Staff and volunteers are not allowed to use their own devices.

Should there be a data protection breach, we will immediately notify all individuals involved and any organisation we are legally bound to inform.

All volunteers and staff must share any concerns they have regarding the wellbeing of any child or young person with DDCA's designated child protection officers (DCPOs): Elliot Sawers and Leigh Nicol. These concerns will be recorded and passed on to the relevant child protection agency and/or the police. If we have serious doubts about any child or young person's immediate safety or wellbeing, then we will contact the Police and social services immediately. We will make a referral to Disclosure Scotland when appropriate in accordance with our relevant policy. Appropriate records will be kept by DDCA's child protection officers. Please see our "Child, young person and adults at risk protection policy".

A "Legitimate Interest Assessment" has been carried out and is available on request. We have consulted the DPIA screening checklist (ICO's website), and a Data Protection Impact Assessment is not required, as controlling and processing this data is not likely to result in high risk (in accordance with Article 35 (1), (3) and (4) of the act).