



Data Protection Policy

Policy information	
Organisation	The Arc Agency (Data Controller)
Policy operational date	15th November 2020
Policy prepared by	Jenny Longley (Data Protection Officer)
Policy review date	25th May 2021

Introduction	
Purpose of policy	The purpose of this policy is to ensure The Arc Agency complies with all necessary data protection legislation, follows good practice and protects all clients, staff and other individuals.
Types of data	<p>The Arc Agency processes data belonging to:</p> <ul style="list-style-type: none"> ● The Clients of The Arc Agency (including young people). This is classified as sensitive data because of the age and potentially vulnerable nature of clients and also includes specific sensitive data such as medical information. ● Supporters (contact details only) ● Parents/Guardians of the clients. This is classified of personal information including personal addresses and phone number's

Policy statement	<p>The Arc Agency is committed to:</p> <ul style="list-style-type: none"> ● complying with both the law and good practice ● respecting individuals' rights ● being open and honest with individuals whose data is held ● providing training and support for staff who handle personal data, so that they can act confidently and consistently ● notifying the Information Commissioner voluntarily in the event of a breach of data protection, even if this is not required.
Key risks	<p>The main risks within The Arc Agency are through two main areas:</p> <ul style="list-style-type: none"> ● information about data getting into the wrong hands, through poor security or inappropriate disclosure of information, particularly sensitive data regarding potentially vulnerable individuals ● individuals being harmed through data being inaccurate or insufficient, for instance through medical records being inaccurate for The Arc Agency clients.

Responsibilities	
Company Director	They have overall responsibility for ensuring that the organisation complies with its legal obligations.
Data Protection Officer	<p>Jenny Longley, Director is the appointed Data Protection Officer for The Arc Agency. Her responsibilities include:</p> <ul style="list-style-type: none"> ● Briefing staff on Data Protection responsibilities ● Reviewing Data Protection and related policies ● Advising staff on tricky Data Protection issues ● Ensuring that Data Protection induction and training takes place ● Handling subject access requests ● Approving unusual or controversial disclosures of personal data ● Approving contracts with Data Processors
Employees & Volunteers	All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. (From now on, where 'employees' is used, this includes both paid employees and volunteers.)

Enforcement	<p>Infringement of The Arc Agency Data Protection Policy and related policies is a disciplinary matter and will lead to disciplinary action being taken as per the staff /volunteer handbook.</p> <p>The Arc Agency provides training for all employees and volunteers who process data at any time as part of their job, including a clear line of reporting to the Data Protection Officer to report suspected data breaches or risks to the security of data held by The Arc Agency.</p>
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Security	
Scope	Data Security is not wholly a Data Protection issue and also supports Business Continuity.
Setting security levels	Because The Arc Agency holds sensitive information of their clients and their parents/guardians a high level of security is required for all data held by The Arc Agency.
Security measures	<p>Data held on participants in community programmes:</p> <ul style="list-style-type: none"> ● Password protection on the database holding the records ● A clear desk policy to ensure no paper records are visible when data is being entered into the computer. ● Paper records to be stored in a filing cabinet locked with a key, copies of which are only held by the Data Protection Officer and the Outreach Officer who leads the community programme delivery.
Business continuity	All data will be backed up on a secure password protected server, the password for which will only be held by the Data Protection Officer.

<p>Specific risks</p>	<p>When data needs to be given outside of the office environment (for Auditions, production companies and casting agents), lists of names to check attendance will be held separately to sensitive information about participants. Sensitive information will be stored separately in a secure password protected and encrypted portable storage drive.</p> <p>No employees should give away any data information over the phone or by email.</p> <p>Contact details or sensitive information for under 16s should not be given over the phone and should be given to the programme leader in person. Adult contact data may be given over the phone if the subject gives consent.</p>
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<p>Data recording and storage</p>	
<p>Accuracy</p>	<p>Measures to ensure data accuracy include:</p> <ul style="list-style-type: none"> ● Where information is taken over the telephone, it is checked back with the individual before the conversation is complete ● Where information is handwritten by the subject themselves, a copy of the information entered will be checked with them at the next point of contact, to ensure handwriting has been copied accurately. ● Where information has been supplied by a third party (e.g. parents of a young person), the information similarly will be double checked with the individual concerned at the next point of contact.
<p>Updating</p>	<p>A regular cycle of checking, updating and discarding old data will be undertaken every 6 months.</p>
<p>Storage</p>	<p>If there are particular considerations about where specific information should be stored, this should be mentioned</p>
<p>Retention periods</p>	<p>Data concerning clients will be held for up to 36 months after an individual's last contact with The Arc Agency.</p>
<p>Archiving</p>	<p>Data will be destroyed using a shredder or secure deletion software.</p>

Responsibility	Jenny Longley, Data Protection Officer is responsible for ensuring that right of access requests are handled within the legal time limit which is one month.
Procedure for making request	Right of access requests must be in writing. The Arc Agency will provide a standard request form. All employees are required to pass on anything which might be a subject access request to Jenny Longley without delay.
Provision for verifying identity	Where the person managing the access procedure does not know the individual personally their identity should be checked before handing over any information.
Charging	<p>The Arc Agency will provide the information free of charge, although reserves the right to ask a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive, or to comply with requests for further copies of the same information (not all subsequent access requests however).</p> <p>The fee will be based on the administrative cost of providing the information only.</p>
Procedure for granting access	If the request is made electronically, we will provide the information in a commonly used electronic format. We will endeavour to provide remote access to a secure self-service system which would provide the individual with direct access to his or her information where possible.
Accessing and amendments	<p>You have the legal right to access your data, or to change your data if it is inaccurate. You also have the right for the data to be removed, unless we have a legitimate reason for keeping it. In order to do this, please put your request in writing by arc.agency2020@gmail.com We will respond to all requests within 4 weeks of receipt.</p> <p>If you have any query about your data and your rights, you can contact us, addressing your query to the Data Protection Officer, by emailing arc.agency2020@gmail.com.</p> <p>If you are not happy with our response, you also have the legal right to complain to the Information Commissioner's Office.</p>

Transparency

Commitment	<p>The Arc Agency is committed to ensuring that Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> ● for what purpose it is being processed ● what types of disclosure are likely, and ● how to exercise their rights in relation to the data
Procedure	<p>Data Subjects will be informed of how their data is being used through:</p> <ul style="list-style-type: none"> ● with occasional reminders in the newsletter ● on the web site

Lawful Basis	
Underlying principles	<p>The lawful basis for the personal data held by The Arc Agency is:</p> <ul style="list-style-type: none"> ● Consent: the individual has given clear consent for The Arc Agency to process their personal data for a specific purpose.

Employee training & Acceptance of responsibilities	
Induction & continued training	<p>All employees who have access to any kind of personal data will have their responsibilities outlined during their induction procedures, and there will be continued opportunities to review and raise Data Protection issues during employee team meetings and supervisions, as well as refresher training courses.</p>
Procedure for staff signifying acceptance of policy	<p>Employees will show acceptance of their responsibilities to Data Protection through the inclusion of the policy in the Company Handbook which is accepted as part of the contract of employment with The Arc Agency.</p>

Policy review	
Responsibility	<p>Jenny Longley Data Protection Officer has responsibility for reviewing this policy.</p>

Procedure	Other staff members and employees who process data will be consulted in the review to ensure that all systems are fit for purpose and are up to date with both legislation and the practical requirements of The Arc Agency's day-to-day activities.
Timing	The review will be undertaken from 25/05/2021.