

FIGHTING WORDS

THE WRITE TO RIGHT

Data Protection Policy

Data Protection Acts 2018 and General Data Protection Regulation

In order to run the creative writing programmes at Fighting Words, it is necessary to collect and maintain information about volunteers who tutor at workshops, summer camps and other programmes as well as the schools and other organisations who book groups of children for sessions at the centre and other locations. All volunteers and schools will be advised from the outset that information is kept in line with the Data Protection Act 2018 ("the Act") and the General Data Protection Regulation ("GDPR").

1. Personal data pertaining to staff, volunteers and school/other group (hereafter called the "data subject") data shall be lawfully and fairly collected. Compliance with this policy is stated in the volunteer application form and booking forms for programmes. In order to collect this data fairly, all data subjects will be made aware of the following:
 - a. The name of the data controller
 - b. The purpose in collecting the data
 - c. The identity of any representative nominated for the purposes of the Data Protection Act 2018
 - d. The persons or categories of persons to whom the data may be disclosed
 - e. Whether replies to questions asked are obligatory and the consequences of not providing replies to those questions
 - f. The existence of the right of access to their personal data
 - g. The right to rectify their data if inaccurate or processed unfairly
 - h. Any other information which is necessary so that processing may be fair to ensure the data subject has all the information that is necessary so as to be aware as to how their data will be processed
2. Under the GDPR, data subjects have the following rights:
 - **Right to access the data** –the right to request a copy of the personal data that Fighting Words holds about them, together with other information about our processing of that personal data.
 - **Right to rectification** – the right to request that any inaccurate data that is held is corrected, or if we have incomplete information data subjects may request that we update the information such that it is complete.
 - **Right to erasure** –the right to request us to delete personal data that we hold. This is sometimes referred to as the right to be forgotten.
 - **Right to restriction of processing or to object to processing** –the right to request that we no longer process personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
 - **Right to data portability** –the right to request us to provide the data subject, or a third party, with a copy of the data subject's personal data in a structured, commonly used machine-readable format.

3. Volunteers and programme participants (or participants' parents and/or guardians) will be routinely asked for their permission for Fighting Words to use their names and/or photographs on the Fighting Words website or other promotional material.
4. In order to fairly process personal data, all data subjects will have given consent to Fighting Words to do so or for one of the following reasons:
 - a. The performance of a contract to which the data subject is a party, e.g. a parent/guardian registering a child for a summer camp
 - b. In order to take steps at the request of the data subject prior to entering into a contract, e.g. an employment contract
 - c. Compliance with a legal obligation, other than that imposed by contract
 - d. To prevent injury or other damage to the health of the data subject
 - e. To present serious loss or damage to property of the data subject
 - f. To protect the vital interests of the data subject where seeking of the consent of the data subject is likely to result in those interests being damaged
 - g. For the administration of justice
 - h. For the performance of a function conferred on a person by or under an enactment, e.g. a volunteer role
 - i. For the performance of a function of the Government or a Minister of the Government
 - j. For the performance of any other function of a public nature performed in the public interest by a person
 - k. For the purpose of the legitimate interests pursued by a data controller except where the processing is unwarranted in any particular case by reason of prejudice to the fundamental rights and freedoms or legitimate interests of the data subject
5. Data will be kept for specified, explicit and lawful purposes, as set out below.
 - a. For volunteers: personal data will be collected to assess the data subject's suitability as a volunteer and kept so that Fighting Words staff may contact volunteers to work at Fighting Words programmes
 - b. For groups from schools and other organisations: personal data, e.g. a teacher's mobile telephone number, will be collected and kept for the purposes of booking and confirming groups at Fighting Words programmes
 - c. For staff: personal data will be kept and maintained as part of the employment contract
 - d. For parents/guardians: personal data about children, e.g. name, age, medical conditions, as well as their own name, email address and telephone number will be collected and kept for the purposes of booking and confirming participation at summer camps and other programmes run during weekends (e.g. Write Club) and school holidays.
6. Any use or disclosure of information collected and maintained by Fighting Words will be compatible with the purpose(s) for which the data was collected and kept. This rule may be lifted in certain restricted cases by Section 8 of the Data Protection Act. Examples of such cases would include some situations where disclosure of the information is required by law or is made to the individual himself/herself or with her/his consent.
7. Appropriate security measures will be taken against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. To this end, the standards of security include the following:

- a. Access to the central IT server is restricted to a secure location to a limited number of staff
 - b. Access to any personal data within Fighting Words is restricted to authorised staff on a "need-to-know" basis
 - c. Access to computer systems are password protected
 - d. Information on computer screens and manual files will be kept hidden from callers into the Fighting Words office
 - e. Back up procedures are in place for computer-held data
 - f. Reasonable measures shall be taken to ensure that staff are made aware of Fighting Words' security measures and complying with them
 - g. A designated person, Sara Bennett, General Manager, is responsible for data security and for periodic reviews of the measures and practices in place
8. All data kept by Fighting Words will be accurate, complete and up-to-date. To this end, Fighting Words will periodically review and audit the data kept on file to ensure that it is up-to-date.
9. All data kept by Fighting Words will be adequate, relevant and not excessive to the purposes for which it is required. A periodic review will be carried out of the relevance of the personal data sought from data subjects through the various channels by which information is collected, e.g. forms, the website, etc. In addition, a review will also be undertaken on the above basis of any personal information already held.
10. Data collected and maintained by Fighting Words shall be retained by Fighting Words for no longer than is necessary for the specified purpose(s) for which it was collected. The Data Protection Act specifies that personal data collected for one purpose cannot be retained once that initial purpose has ceased. To this end:
- a. Personal data for all data subjects will be kept for a period of 12 months following the completion of a Fighting Words programme and/or after the volunteering relationship has ended
 - b. Relevant staff shall ensure that files are regularly purged and personal information will not be retained for any longer than is necessary
11. All data subjects will be given a copy of the personal data held on request. To make an access request, the data subject must:
- a. Make the request in writing (which can include email)
 - b. Give any details which might be needed to help Fighting Words identify her/him and locate all the information Fighting Words keeps about her/him, e.g. previous addresses, etc.
12. In response to an access request under Article 15 of the GDPR, Fighting Words will supply the information to the data subject promptly receiving the request. The information will also be provided in a form that will be clear to the ordinary person, i.e. any internal codes will be explained.
13. Breaches: In line with the requirements of the Act, all breaches will be reported to the DPC, typically within 72 hours, unless the data was anonymised or encrypted. Breaches that are likely to bring harm to an individual – such as identity theft or breach of confidentiality – will also be reported to the individuals concerned.
14. Data subject information in hard copy will be held within a locked cupboard/filing cabinet within the locked premises of Fighting Words and will only be accessed by relevant members of staff.

Sara Bennett
Data Controller

29 August 2018