YOUNG SOMERSET

DATA PROTECTION POLICY

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1. Introduction

Young Somerset (YS) processes personal data relating to staff, volunteers, trustees, job applicants, and service users (young people and families). We are committed to protecting this data and handling it responsibly, in line with the **UK GDPR**, the **Data Protection Act 2018**, and related regulations.

YS has appointed a **Data Protection Officer (DPO)** to oversee compliance and ensure that all personal data is processed fairly, lawfully, and securely. This policy applies to:

- All staff, trustees, and volunteers.
- Contractors and suppliers providing goods or services to YS.

It should be read alongside YS's **Privacy Notices** and **Information Sharing Agreements**.

2. Data Protection Principles

- YS will comply with the UK GDPR principles, ensuring personal data is:
- Processed fairly and lawfully.
- Used only for lawful purposes.
- Adequate, relevant, and not excessive.
- Accurate and kept up to date.
- Retained no longer than necessary.
- Processed in line with individuals' rights.
- Stored and transmitted securely.
- We will record how data is collected, stored, used, and shared. Staff are trained to understand their responsibilities for data security and good records management.

3. Definitions

- **Data Subject:** an individual whose personal data is processed.
- **Parental Consent:** includes consent from a legal guardian.

4. Risks

YS recognises risks associated with data handling, including:

- Inappropriate access or sharing.
- Loss or theft of data.
- Poor records management or insecure destruction.
- Inadequate response to Data Subject Access Requests (DSARs).

Non-compliance could cause reputational harm and financial penalties. This policy aims to mitigate these risks.

5. Personal Data

- Covers facts or opinions identifying an individual.
- May include sensitive categories (see below).
- Disclosed only with consent or under legal exemptions.
- All staff receive training on handling and sharing data appropriately.
- Data will be retained only as long as necessary.

Any unauthorised access to personal data will result in disciplinary action.

6. Sensitive Personal Data

YS may process sensitive data including health, gender, religion, ethnicity, sexual orientation, trade union membership, and criminal records.

- Access is limited strictly to staff who require it for their role.

7. CCTV

YS operates CCTV (e.g. at Bold & Brave, Taunton) for public safety and security.

- Images only (no audio) are recorded under the lawful basis of **Public Task**.
- A **Data Protection Impact Assessment (DPIA)** was completed before installation.
- Data is retained only as long as necessary, unless required for police investigations.
- Access is restricted to authorised individuals.

8. Rights of Access (Subject Access Requests)

- Individuals have the right to access their data under the UK GDPR and Freedom of Information Act 2000.
- Requests must be made in writing to the Data Protection Lead.
- YS will respond within **one calendar month**.
- Certain medical data may be used for research and planning, but service users may **opt out** of confidential patient data sharing.

9. Exemptions

The Data Protection Act 2018 allows exemptions in limited cases, including:

- National security.
- Crime prevention or detection.

- Safeguarding, counter-terrorism, or legal obligations.

10. Accuracy

YS will keep personal data accurate and up to date.
Data subjects must notify YS of corrections needed.

11. Enforcement & Complaints

Concerns should be raised with the Data Protection Lead.
Individuals can also contact the **Information Commissioner's Office (ICO)**: https://ico.org.uk/global/contact-us/ .

12. Data Security

- Personal data must be protected from unlawful access, loss, or damage.
- Staff, trustees, contractors, and service users must respect data privacy.
- Appropriate technical and organisational measures must be applied.
- Breaches meeting ICO thresholds will be reported within **72 hours**, and affected individuals informed without undue delay.

13. Video & Photographs

Photographs and videos identifying individuals are personal data.

- Data subjects must be informed of:
    - Purpose of collection.
    - Who will access it.
    - How long it will be kept.
    - Whether it will be shared.

14. External Processors

Where external providers process YS data (e.g. cloud storage, IT systems), YS will ensure contracts require compliance with GDPR and this policy.

15. Secure Destruction

Data will be destroyed securely in line with best practice (e.g. shredding, secure deletion of electronic files).

16. Data Retention

- Data is retained only as long as legally or operationally required.
- See YS's **Records Management Policy** for details.
- Some items (e.g. registers, photos, achievements) may be archived indefinitely.

17. Right to Erasure

Data subjects may request deletion of their personal data. YS will comply unless data is required for legal or safeguarding purposes or retained in archives for lawful reasons.

18. Review

This policy will be reviewed **annually** by the Data Protection Lead.

Vicky Thomas
Signed by the **Data Protection Lead** and on behalf of the **Board**.
28th August 2025