



YuGo Data Protection Policy

If you require this information in any other accessible format, please contact:

YuGo Exercise Engagement Pioneers
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ACRONYMS

Data Protection Act 2018 (DPA)
General Data Protection Regulation
Data Protection Officer (DPO)
Data Security & Protection Toolkit (DSPT)
Information Commissioner's Office (ICO)
The Information Asset Register (IAR)
Record of Processing Activities (ROPA)

LEGISLATION

The Company is obliged to abide by all relevant UK legislation. The requirement to comply with this legislation will be devolved to employees and agents of the Company, who may be held personally accountable for any breaches for which they may be responsible. The Company will comply with the following and any other applicable legislation:

The Data Protection Act (2018)
The Copyright, Designs and Patents Act (1988)
The Computer Misuse Act (1990)
The Health and Safety at Work Act (1974)
Human Rights Act (1998)
Regulation of Investigatory Powers Act 2000
Freedom of Information Act 2000

1. INTRODUCTION

- 1.1 This Data Protection Policy is the overarching policy for data security and protection for YuGo (hereafter referred to as "us", "we", or "our").
- 1.2 YuGo's designated Data Security and Protection Leads are: Naomi Boast (Head of Operations) and Max Pemberton (YuGo Director).

2. PURPOSE

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2.1 The purpose of the Data Protection Policy is to support the 10 Data Security Standards, the General Data Protection Regulation (2016), the Data Protection Act (2018), the common law duty of confidentiality and all other relevant national legislation. We recognise data protection as a fundamental right and embrace the principles of data protection by design and by default.

2.2 This policy includes in its scope all data which we process either in hardcopy or digital copy, this includes special categories of data.

2.3 The aims of the policy are:

- YuGo needs to keep certain information on its staff, participants, volunteers, and directors to carry out its day-to-day operations, to meet its objectives and to comply with legal obligations.
- The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 2018 (DPA).
- To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.
- This policy covers the duties and responsibilities of employed staff, volunteers, and directors.
- Staff and volunteers who breach the Data Protection Policy may be subject to Allsorts' disciplinary procedures. Any breach involving a volunteer or member of staff from another agency may result in them being asked to leave a YuGo activity or service.

3. PRINCIPLES

3.1 We will establish and maintain policies to ensure compliance with the Data Protection Act 2018, Human Rights Act 1998, the common law duty of confidentiality, the General Data Protection Regulation and all other relevant legislation.

3.2 We will establish and maintain policies for the controlled and appropriate sharing of member and staff information with other agencies, taking account all relevant legislation and citizen consent

3.3 Where consent is required for the processing of personal data we will ensure that informed and explicit consent will be obtained and documented in clear, accessible language and in an appropriate format. The individual can withdraw consent at any time through processes which have been explained to them and which are outlined in our Record Keeping Policy: Withdrawal of Consent procedures. We ensure that it is as easy to withdraw as to give consent.

3.4 We will undertake annual audits of our compliance with legal requirements.

3.5 We acknowledge our accountability in ensuring that personal data shall be:

- 3.5.1 Processed lawfully, fairly and in a transparent manner;
- 3.5.2 Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

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- 3.5.3 Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
 - 3.5.4 Accurate and kept up to date;
 - 3.5.5 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 ('storage limitation');
 - 3.5.6 Processed in a manner that ensures appropriate security of the personal data.
- 3.6 We uphold the personal data rights outlined in the GDPR;
- 3.6.1 The right to be informed;
 - 3.6.2 The right of access;
 - 3.6.3 The right to rectification;
 - 3.6.4 The right to erasure;
 - 3.6.5 The right to restrict processing;
 - 3.6.6 The right to data portability;
 - 3.6.7 The right to object;
 - 3.6.8 Rights in relation to automated decision making and profiling.
- 3.7 We have determined that we are not required to have a Data Protection Officer (DPO). Nonetheless, to ensure that every individual's data rights are respected and that there are the highest levels of data security and protection in our organisation, we have appointed two members of staff to be our Data Security and Protection Leads. The Data Security and Protection Leads will report to the highest management level of the organisation (the Board of Directors). We will support the Data Security and Protection Lead with the necessary resources to carry out their tasks and ensure that they can maintain expertise.

4. UNDERPINNING POLICIES AND PROCEDURES

- 4.1 This policy is underpinned by the following:
- Data Quality Policy – outlines procedures to ensure the accuracy of records and the correction of errors;
 - Record Keeping Policy – details transparency procedures, the management of records from creation to disposal (inclusive of retention and disposal procedures), information handling procedures, procedures for subject access requests, right to erasure, right to restrict processing, right to object, and withdrawal of consent to share;
 - Data Security Policy – outlines procedures for the ensuring the security of data including the reporting of any data security breach;
 - Business Continuity Plan – outlines the procedures in the event of a security failure or disaster affecting digital systems or mass loss of hardcopy information necessary to the day to day running of our organisation;
 - Allsorts' Confidentiality policy - provides staff with clear guidance on the disclosure of personal information.

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5. DATA PROTECTION BY DESIGN AND DEFAULT

- 5.1 We shall implement appropriate organisational and technical measures to uphold the principles outlined above. We will integrate necessary safeguards to any data processing to meet regulatory requirements and to protect individual's data rights. This implementation will consider the nature, scope, purpose and context of any processing and the risks to the rights and freedoms of individuals caused by the processing.
- 5.2 We shall uphold the principles of data protection by design and by default from the beginning of any data processing and during the planning and implementation of any new data process.
- 5.3 All new systems used for data processing will have data protection built in from the beginning of the system change.
- 5.4 All existing data processing has been recorded on our Record of Processing Activities. Each process has been risk assessed and is reviewed annually.
- 5.5 We ensure that, by default, personal data is only processed when necessary for specific purposes and that individuals are therefore protected against privacy risks.
- 5.6 In all processing of personal data, we use the least amount of identifiable data necessary to complete the work it is required for and we only keep the information for as long as it is required for the purposes of processing or any other legal requirement to retain it.
- 5.7 Where possible, we will use pseudonymised data to protect the privacy and confidentiality of our staff and those we support.
- 5.8 Contracts with external contractors that allow access to the Company's information systems will be in operation before access is allowed. These contracts will ensure that the staff or subcontractors of the external organisation comply with all appropriate information governance/security policies.

6 RESPONSIBILITIES

6.1 Our designated Data Security and Protection Leads are: Naomi Boast and Max Pemberton.

The key responsibilities of the leads are:

- 6.1.1 To ensure the rights of individuals in terms of their personal data are upheld in all instances.
- 6.1.2 To define our data protection policy and procedures and all related policies, procedures and processes and to ensure that sufficient resources are provided to support the policy requirements.
- 6.1.3 To monitor information handling to ensure compliance with law, guidance and the organisation's procedures and liaising with senior management and the trustees to fulfil this work.

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APPROVAL

This policy has been approved by the Board of Directors and will be reviewed at least every 3 years.

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| Name | NAOMI BOAST |
| Signature |  |
| Approval Date | 19/10/2023 |
| Review Date | 19/10/2026 |

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