



Supporting children, women, and families disadvantaged
by poor health, disability, and social exclusion

Data Protection Policy

Registered Charity 1100459

Approved on 1 April 2011 *Revised 26 September 2013* *Revised 24 June 2017*
Revised 27 September 2021

Background

The Data Protection Act 2018 regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

Data users must comply with the eight data protection principles of good practice that underpin the Act. Personal data must:

1. be obtained and processed fairly and lawfully
2. be held only for specified purposes
3. be adequate, relevant and not excessive
4. be accurate and up to date
5. not be kept longer than necessary
6. be processed in accordance with the Act
7. be kept secure and protected
8. not be transferred to countries without adequate data protection.

It is the policy of HealthProm that all personal data will be held in accordance with the principles and requirements of data protection and other relevant legislation, and that procedures will be put in place to ensure the fair processing of data subjects.

HealthProm and all people working for and with HealthProm, including board members, staff, consultants, interns and volunteers who process, or use personal data must ensure that they abide by these principles at all times.

HealthProm is the data controller under the Act and is therefore ultimately responsible for implementation. However, day to day matters, notification, contact with the Information Commissioner, ensuring that this data protection policy and compliance is reviewed at appropriate intervals and the handling of subject access requests will be dealt with by the Data Protection Officer under the supervision of the Director of Operations.

Relevant data protection issues will be included in all induction and training.

Information held by HealthProm

1. Information held by HealthProm relates to partner organisations, donors and other organisations in the public and private sectors as well as individuals (including patrons, board members, staff, consultants, interns and volunteers as well as members, mailing-list subscribers and service providers,) which HealthProm deals with as part of its mission and charitable purposes.
2. HealthProm will not give out information about any individual over the telephone or by e-mail unless it is satisfied that that this type of disclosure may be made and/or the information is already in the public domain.
3. No details of individuals will be passed to third party organisations or companies for marketing or fundraising purposes.
4. The website will not contain any personal data that is not absolutely necessary. Where information is captured on the website, details of what information will be captured and how it will be used are clearly stated in HealthProm's website Privacy Policy, which is available to read at www.healthprom.org.
5. Photographs, recordings, videos or DVDs in which individuals are identifiable will only be used with their explicit consent.
6. As stated in the terms and conditions of www.healthprom.org, the names and details in case studies may be changed in order to protect the identity of the children, families and communities HealthProm works with.
7. Manual files containing "sensitive" information about individuals (as defined as such under the Data Protection Act) will be labeled confidential and kept in locked filing cabinets, accessible only to the Chief Executive and relevant staff.
8. Computer files containing sensitive information about individuals will be password protected, accessible only to the Chief Executive and relevant staff.
9. Information no longer required will be disposed of appropriately including deletion from any computer system.
10. All information held by HealthProm will be handled in accordance with HealthProm's ICT Acceptable Use Policy, Privacy Policy and any other information and communication policies as revised and amended from time to time.

Information held by non-EEA partners on behalf of HealthProm

11. When designing and implementing projects, HealthProm works with both individuals and institutional partners in countries outside the European Economic Area. As per the eighth principle of the Data Protection Act 2018, "Personal data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data."
12. Healthprom will only transfer personal data to its overseas partners for the purposes providing legitimate contact details e.g. of relevant staff, project managers etc. Should the need arise for any other such data to be transferred this will be considered by HealthProm's staff and project managers on a case by case basis and the express consent of the data subject will be obtained.

Personnel records

13. The names and post held by staff within HealthProm are considered to be in the public domain and may be made freely available in any format to anyone.

14. The names and roles of Board members within HealthProm and people seeking election or nomination as Board members are considered to be in the public domain and may be made freely available in any format to anyone.

15. The contact details (addresses, telephone numbers, fax numbers, and email addresses) of Board members shall only be made available to the Board and staff, and only for the purpose of making contact in furtherance of HealthProm's governance.

16. The home and mobile telephone numbers of staff and consultants are confidential but shall be made available to Board members, staff and consultants for the purpose of making contact in an emergency or urgent work related matter.

17. All material in respect of all applicants, other than the successful applicant, gained during the recruitment of staff, interns or volunteers is confidential. Details of job applicants shall be retained for up to 12 months and then destroyed.

18. All information required for the purposes of payroll is confidential and made available only to the Board, the Chief Executive and the Finance and Administration Manager.

19. Information will be passed to statutory bodies if a legal requirement, such as in connection with tax and national insurance.

20. All other information within personnel records is confidential and can only be made available to the Board and the Chief Executive. Personnel records are only used for matters connected with the individual's employment at HealthProm or to help with references HealthProm might write in future at the individual's request.

Databases of organisations and other contacts

21. Data about individuals (including those who are contacts for other organisations) shall be confined to contact details and information directly relevant to the reason for their inclusion on HealthProm's databases. Other information about organisations may be held provided it is not personal data.

22. Data about individuals shall be deleted on the request of the individual or when the data is no longer used or required by HealthProm for legal, financial or contractual reasons.

23. Data about individuals shall only be used by HealthProm for:

- circulating HealthProm's newsletter and other information about HealthProm and its work, via mailings
- fundraising (unless the individual/ organisation has opted out of receiving such appeals)
- any other reason which has been specifically agreed with that individual/organisation in advance.

24. The following statements should be used on relevant forms:

HealthProm will use the information you have provided for the purpose of informing you about HealthProm's work and the different ways in which you can help.

HealthProm will not share your contact details with any other organisation, and you can unsubscribe at any time.

If you have any query about the use we make of your data, please contact HealthProm's Data Protection Officer.

Access to information

25. Data Subject Access requests should be made in writing and signed by the individual and addressed to the Data Protection Officer at HealthProm.

26. In response to a Data Subject Access request, HealthProm aims to disclose as much information as possible within 40 days, while respecting the right of any third party to maintain confidentiality wherever reasonable.

27. No charge will be made for Data Subject Access requests from Board members, staff, consultants, interns or volunteers.

28. A charge of £10 will be made for Data Subject Access requests from service providers

Queries

27. In case of any queries in relation to this policy please contact HealthProm's Data Protection Officer.