

Opening Doors and your information

This is our policy about your **personal data**.

It tells you

1. why we have this policy and who it is for
2. what the new law is about
3. what personal information we hold and how we get it
4. why we hold your personal information
5. how we keep your information safe
6. how we make sure staff and volunteers at Opening Doors understand how to keep information safe
7. your rights to do with your personal data
8. what we will do if things go wrong
9. sharing your personal information

1. Why we have this policy and who it is for

This policy talks about all the things Opening Doors has to do about personal information and the law.

Personal data is another way of saying **personal information**

This is information that is all about you. You should be careful to protect it or keep it private.

Examples of your **personal data** are your name, address, telephone number, email address and date of birth.

It might be things like records of a conversation an adviser has with you when we are offering advice or information.

It might be things to do with having a job at Opening Doors like your supervision notes.

It also includes photographs and videos

We know looking after your personal data is a big responsibility and we take it very seriously.

We promise to look after and use your personal information within the law.

Opening Doors holds personal information about different groups of people.

This policy is for **all** of those groups; members, paid staff, volunteers, people asking for advice and information and those who want to hear about our organisation.

2. **General Data Protection Regulation or GDPR**

This is a new law that starts in May 2018

This law will make it clearer about how your personal information is looked after – at Opening Doors and other places.

The main parts (principles) of the new law say:

- We can only hold your personal information if we have a proper reason to have it
- We can only use your personal information for the reason we asked for it. We can't use it for anything else.
- The information we hold has to be up to date and we get rid of out of date information as soon as possible.
- We only keep your information for as long as we need it and no longer
- We keep your information as safely as we can so other people can't see it or use it

Opening Doors is a charity run by and for people with Learning disabilities.

We offer advice and information, training and advocacy to people with learning disabilities and professionals. We also make complicated documents into easy read.

We have members, paid staff and volunteers.

Our office is at

38a Bull Close

Norwich NR3 1SX

You can contact us on 01603 631433 or admin@openingdoors.org.uk

Opening Doors collects and uses personal information about people so we can do our daily work as a charity and for the organisation to work well.

We are registered with the Information Commissioner's Office (ICO). Our registration number is Z8178688

The Senior Adviser and Trustees are in charge of keeping your data safe, but everyone has a responsibility to keep within the law.

We have a file which shows

- Who is in charge of looking after your information
- Which other companies we work with at Opening Doors that might hold personal information. They will show how they will keep your information safe.
- What sort of information we have and who that belongs to (e.g. members, volunteers, paid staff, contacts)
- How long we will keep information for and how we will check it is not out of date
- How we will keep information safe – our plan
- Records of Subject Access Requests (when someone asks to see the information we hold about them)
- Our risk assessment about keeping information safe

3. What personal information we hold and how we get it

Members

We hold your name, address, date of birth, phone number and email.

We also hold health information that you **choose** to give us so we can support you safely.

We hold an emergency number for a family member or friend in case something goes wrong.

We get this information from your membership form

*We need your **consent** to hold this information*

We may hold records of when we have supported you or given you advice or information.

We get this from you when you ask for advice or information.

We will keep this information for as long as it is useful to you and is needed to show what advice we gave you. We will always check with you when we write something down.

We sometimes hold photographs, videos and stories about you.

We get this information when you are taking part in Opening Doors activities. We will always ask if we can take a picture or make a video or use your story.

*We need your **consent** to hold this information.*

We will check with you every year to make sure you are happy for us to hold this information

Remember you can change your mind about us holding this information.

This will mean you don't hear from Opening Doors again.

If you do training we will hold your bank details and National Insurance Number. This is so we can put money into your account and give the right information to the HMRC about your tax.

*We can hold this information because we have an **agreement** with you.*

Staff members

We hold your name, address, telephone number and email address.

We also collect some or all of this information:

- recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;
- your date of birth
- your gender
- your marital status and family details;
- information about your contract of employment, including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement;
- your bank details and information about your tax including your national insurance number;
- your identification documents including passport and driving licence and information about your immigration status and right to work for us;
- information about disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings),

including reports and warnings, both formal and informal;

- information about your performance and behaviour at work, including assessments, supervisions, performance reviews and appraisals;
- training records;
- electronic information about your use of IT systems/swipe cards/telephone systems;
- your images (whether captured on CCTV, by photograph or video);
- other sorts of personal data which we may tell you about from time to time.

We can hold and use this information because we have a **contract** with you.

We hold emergency contacts in case things go wrong. We may hold health information which you have given us.

We ask for your **consent** to hold this information

Volunteers including Trustees

We hold your name, address, telephone number and email address. We also hold your training record, your application to be a Trustee or volunteer and a copy of your DBS certificate.

We hold this information because the Charity Commission says we must to be able to run our organisation legally.

People we send our newsletter and other news to

We may hold your name, address, telephone number and email address.

*We need your **consent** to hold this information. You can change your mind at any time and we will stop sending news about Opening Doors to you.*

We will check each year to make sure you still want us to send you information.

5. How we keep your personal information safe

We keep your information in the safest ways we can so that the chance of someone else getting your information is as small as possible.

- We will only keep your information for **as long** as we need it and we will only keep it **for the reasons that we say**.
- All the information we keep on the computer is held on a **secure server**. This means that you need a password to see it.
- We change passwords every 90 days.
- If we are sending an email **within** the system we use a person's initials so they can't be identified.
- Personal information like names and addresses is only be sent to people outside the secure system though the 'secure@openingdoors' email address
- Where staff or volunteers work away from the Opening Doors office (**remote working**) they will use the secure server. This means you need a username and password.
- If computers or laptops are left they will lock so you need a username and password to get to information
- Personal information on paper, disc or CDs is transported (moved around) securely and stored in a lockable filing cabinet or cupboard.
- Mobile phones have passwords
- The company that looks after our computers and information checks that your information is safe. They make sure that the passwords are changed often. They provide 'prompts' to remind us to change passwords
Only members of paid staff can see personal information on the computer.

- Our CCTV film is 'encrypted'. This means that you need a password to be able to play it back
- We keep personal information in **locked** filing cabinets and cupboards.
- We do not leave personal information where other people can see it

6. How we make sure staff and volunteers at Opening Doors understand how to keep information safe

Opening Doors will make sure all staff, workers, volunteers and members know about this policy.

All staff and volunteers will support this policy.

New staff will get training on GDPR as part of their induction

All staff will get training about GDPR and then every 2 years or sooner if needed.

7. Your rights to do with personal data

You have the right to ask to look at any information we hold about you. This is called a **subject access report**.

If someone asks you for a **subject access report** you must tell the Senior Adviser as soon as possible.

In most cases we will answer you in one month. If you have asked for a lot of information, or if the information is very complicated we can say we need extra time to provide the information you asked for. This can be up to 3 months.

You do not have to pay for a subject access report (to see what information we hold about you).

If you want to look at lots and lots of information we may need to ask you to pay towards this.

If we believe that you are being **very** unreasonable (not fair) to Opening Doors we may say we can't give you the information you are asking for.

You can change the information we hold about you so it is correct. You need to speak to the Senior Adviser to do this.

Sometimes you can ask us to **delete** or destroy information we hold about you. You should contact the Senior Adviser in this case.

You have the right to be told if your information is given to the wrong person or organisation

You can complain to us or to the **Information Commissioner's Office** if you think we have done something wrong with your information. You can contact them on their website at www.ico.org.uk

How we get your information

Most often at Opening Doors **you** give **us** your information so you can take part in the things we do here.

This might be things like your name and address or medical details so we can keep you safe if you are ill. We ask you to fill in a membership form when you join Opening Doors.

If you come to us for advice or information we will fill in a **conversation record**. This may have personal information on it. We ask you to sign the form if you are in the office.

If you are on the phone we will tell you that we are writing down the things we are saying. We will read the conversation record back to you so you know what information we have.

If you are a paid member of staff we ask you to give us information so we can do our part of our contract – things like paying you your money.

We have **CCTV cameras** to keep the building safe. There are cameras in the building and outside in the carpark. We have information signs that tell you about our CCTV system.

You can ask to see the film. We will check to see if you are on the film first before we show it to you. We will show you the film within one month of you asking to see it.

We take photographs and videos. We use these to tell people about our work. We always ask your permission to use the photos and video. It is always OK to say no.

8. What happens if we pass your information on to the wrong people by accident?

This is called a 'breach'

We will try our best to keep your personal information safe, but if your information does go to the wrong person or organisation we will tell you straight away.

If your information goes to the wrong people, or if people steal your information the Senior Adviser must be told.

If personal information goes missing or goes to the wrong place we will keep a record of what has happened.

We will also tell the **Information Commissioner's Office** if it is a big problem and lots of information is lost or goes to the wrong people.

We will do this within 72 hours.

We will think about what went wrong and try to stop it happening again.

9. Sharing your personal information

Remember!

- We **only** pass information on to other people if you give us permission to do that.
If you **do** give us permission (say we can) we will only pass on **that** bit of information – nothing more.
- Opening Doors **never** sells or gives away your information to another organisation

These are the times we may need to tell your information to someone without your direct consent at that time

- If we think you are in danger or we think someone is abusing you we **will** pass on your information to someone like the police or Social Services who can keep you safe.
We do not need your permission to do that.
- We may need to give staff or worker information to authorities for example for tax purposes, payroll and admin matters.

Policy written May 2018

Policy will be reviewed May 2019 or before if needed.

