



*Developing young people through  
personal challenge*

## Data Protection Policy

Youth Challenge Oxfordshire (YoCO) and all trustees, employees, volunteers and representatives ("YoCO Personnel") shall always operate within the law relating to data protection, complying with all legislative and regulatory requirements, and any other external obligations. All personal data shall be obtained, maintained, stored, used and shared only in strict accordance with the relevant legislation.

YoCO Personnel responsible for using personal data must make sure the information included in personal data is:

1. used fairly and lawfully
2. used for limited, specifically stated purposes
3. used in a way that is adequate, relevant and not excessive
4. accurate
5. kept for no longer than is necessary
6. handled according to people's data protection rights
7. kept safe and secure
8. not transferred outside the UK without adequate protection (see SLA) and destroyed immediately after the group returns

The YoCO Data Protection Officer will ensure that this is applied in all cases.

### **Special Categories of Data.**

There is stronger legal protection for more sensitive information, such as:

1. ethnic background
2. political opinions
3. religious beliefs
4. health
5. sexual health / sexual orientation
6. race
7. criminal records
8. trade union membership
9. genetic and biometric data

YoCO will process special categories of data when the following applies:

1. a parent/guardian/carer has given explicit consent to the processing
2. the data must be processed by YoCO in order to carry out our legal obligations
3. the data must be processed by YoCO for reasons of substantial public interest and safeguarding.
4. The individual has already made the data public

YoCO does not need consent if special categories of personal data are used in order to carry out our legal obligations.

Anytime personal data is shared with another party a secure mailing system such as Egress Switch should be used.

All YoCO Personnel are required to familiarise themselves with YoCO's Data Protection Policy and attend relevant training.

### **Handling Data**

Information relating to individuals supported by YoCO through the work of the charity will be dealt with in the following manner: YoCO Personnel can only store personal data that is relevant and necessary to their work, this must be stored in accordance with this data protection policy. It will be carefully destroyed when no longer needed and in accordance with up to date guidance. Information that is of vital importance to the future protection of an individual will be securely archived and stored as long as express agreement is obtained from the data subject.

All personal data must be protected by appropriate security measures to safeguard against unauthorised or unlawful processing of personal data. Electronic files will be locked, and the password will be stored by the Data Protection Officer. Paper documents, files, discs, USB devices and hard drives will be stored in a locked cabinet. The storage of any data relating to young people is strictly prohibited on personal devices.

All YoCO Personnel must only access and use data that is relevant to and necessary to the performance of their job function. The destruction of all material containing personalised details should be by means of shredding or by deleting from all electronic storage.

Personal Data will always be treated with the utmost confidence and not divulged outside the charity apart from on a "need to know" basis in the following circumstances:

1. If the young person is under 18 and physical, sexual or emotional abuse is suspected
2. If a young person under 18 reports or alleges abuse
3. If the life of the young person or another is at risk
4. If information is revealed about criminal activity
5. If a young person could cause harm to themselves or others
6. If YoCO Personnel have reasonable cause to believe a young person is suffering or likely to suffer significant harm

When emailing personal data, YoCO Personnel should de-personalise the data where possible and only send what is necessary. When posting personal data, YoCO Personnel should send this by recorded delivery. YoCO Personnel should make recipients aware that they are receiving personal data and check that they will handle according to the Data Protection Act.

### **Exceptions**

The only time information would be given to another agency without an individual's prior knowledge or permission is when:

1. There is immediate risk to an individual's life
2. There is a child at risk

Further information can be found on the government website: <https://www.gov.uk/data-protection/the-data-protection-act>

This policy was adopted at the Board of Trustees Meeting on 29<sup>th</sup> September 2020

On behalf of the Board of Trustees Jane Cranston.....(signed)

This policy will be reviewed annually by the Board of Trustees; Review Date September 2021