

Data Protection Policy for Inclusive Outsource LTD

Effective Date: November 2024

Reviewed by: Directors

Next Review Date: November 2024

At Inclusive Outsource LTD, we are committed to protecting the privacy and personal data of all individuals who engage with our services, including children, young people, vulnerable adults, staff, volunteers, and other stakeholders. This policy sets out how we collect, store, process, and protect personal data in compliance with the EU General Data Protection Regulation (GDPR) and other relevant data protection legislation.

1. Purpose and Scope

The purpose of this policy is to:

- Ensure that personal data is handled in a way that respects the privacy of individuals and complies with the GDPR.
- Outline the rights of individuals whose data we collect, process, or store.
- Ensure that all staff, volunteers, freelance workers, and contractors understand their responsibilities in relation to data protection.

This policy applies to all personal data processed by Inclusive Outsource LTD, including that of staff, volunteers, service users (children, young people, vulnerable adults, and families), freelance workers, and other third-party contractors.

2. Legal Framework

This policy is based on the **EU General Data Protection Regulation (GDPR)**, which governs how organisations collect, store, process, and protect personal data. Key principles from the GDPR include:

- Personal data must be processed lawfully, fairly, and in a transparent manner.
- Personal data must only be collected for specified, legitimate purposes.
- Personal data must be adequate, relevant, and limited to what is necessary for its intended purposes.
- Personal data must be accurate and kept up to date.
- Personal data must not be stored for longer than is necessary.
- Personal data must be processed in a way that ensures its security.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable person (e.g., names, addresses, contact information, health information).
- **Processing:** Any operation performed on personal data, such as collection, storage, or dissemination.

- **Data Subject:** The individual whose personal data is processed (e.g., service users, staff, volunteers).
- **Data Controller:** The organisation (Inclusive Outsource LTD) that determines the purposes and means of processing personal data.
- **Data Processor:** Any individual or organisation that processes personal data on behalf of the Data Controller.

4. Data Protection Principles

Inclusive Outsource LTD adheres to the following **data protection principles**:

4.1 Lawful, Fair, and Transparent Processing

We ensure that personal data is processed in a lawful, fair, and transparent manner. Individuals will be informed about how their data is collected, why it is collected, and how it will be used.

4.2 Purpose Limitation

Personal data is only collected for specific, legitimate purposes that have been clearly explained to the data subject. It will not be further processed in a manner incompatible with these purposes.

4.3 Data Minimisation

We collect only the minimum amount of personal data necessary for the purposes of processing. Any unnecessary data will not be collected.

4.4 Accuracy

We will ensure that personal data is accurate and up to date. Individuals are encouraged to inform us of any changes to their personal information.

4.5 Storage Limitation

Personal data will only be stored for as long as is necessary to fulfil the purpose for which it was collected. After this period, data will be securely deleted or anonymised.

4.6 Integrity and Confidentiality (Security)

We take appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, or unauthorised access. All personal data will be processed in a manner that ensures its security.

5. Individual Rights

Under the GDPR, individuals (data subjects) have the following rights concerning their personal data:

5.1 Right to Access

Individuals have the right to request access to their personal data and to receive information about how it is processed.

5.2 Right to Rectification

Individuals have the right to request corrections to their personal data if it is inaccurate or incomplete.

5.3 Right to Erasure ("Right to be Forgotten")

Individuals have the right to request that their personal data be erased in certain circumstances, such as when it is no longer needed for the purpose for which it was collected or when consent is withdrawn.

5.4 Right to Restrict Processing

Individuals can request that the processing of their personal data be restricted in specific circumstances, such as when they contest the accuracy of the data.

5.5 Right to Data Portability

Individuals have the right to request a copy of their personal data in a machine-readable format to be transferred to another organisation.

5.6 Right to Object

Individuals can object to the processing of their personal data based on legitimate interests or for direct marketing purposes.

5.7 Rights Related to Automated Decision-Making

Inclusive Outsource LTD does not use personal data for any form of automated decision-making that has a legal or significant impact on individuals.

6. Lawful Basis for Processing

We will only process personal data where there is a lawful basis to do so. The lawful bases under the GDPR include:

- The individual has given clear consent for their personal data to be processed for a specific purpose.
- The processing is necessary for a contract with the individual or because they have asked for specific steps to be taken before entering into a contract.
- The processing is necessary to comply with the law (not including contractual obligations).
- The processing is necessary to protect someone's life.
- The processing is necessary for our legitimate interests, provided these are not overridden by the individual's rights and interests.

7. Data Security

Inclusive Outsource LTD takes the security of personal data seriously. We have implemented the following measures to protect personal data from unauthorised access, loss, or damage:

- Access to personal data is restricted to authorised personnel only. Staff, freelancers and volunteers must use strong passwords, and data access is granted on a need-to-know basis.

- Personal data is encrypted where necessary, particularly during transmission or storage.
- Personal data is regularly backed up to prevent data loss in case of technical failures.
- Personal data stored in physical form is kept in secure, locked locations.

8. Data Breaches

A data breach is defined as a security incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. In the event of a data breach:

- Staff , freelancers and volunteers must report the breach immediately to the Designated Data Protection Officer (DPO).
- We will investigate and take necessary steps to mitigate any harm caused by the breach.
- Where a breach poses a high risk to individuals, we will notify the affected individuals without undue delay.
- Serious breaches will be reported to the relevant supervisory authority (e.g., the Information Commissioner's Office (ICO)) within 72 hours of becoming aware of the breach.

9. Third-Party Data Processors

Where third-party processors are used to handle personal data on behalf of Inclusive Outsource LTD, we ensure that:

- Third parties comply with GDPR requirements, including security and privacy standards.
- Data Processing Agreements are in place to outline the responsibilities of both parties in protecting personal data.

10. Data Retention and Disposal

We will not retain personal data for longer than necessary. Our data retention schedule ensures that personal data is securely deleted or anonymised when it is no longer required for the purposes it was collected. Any physical copies of personal data will be disposed of securely through shredding or another appropriate method.

11. Training and Awareness

Inclusive Outsource LTD provides regular training on data protection and GDPR compliance to all staff, volunteers, and freelance workers to ensure they understand their responsibilities in safeguarding personal data.

12. Data Protection Officer (DPO)

Designated Data Protection Officer (DPO):

Name: Michael Sampson

Phone: 07713888701

Email: michael@inclusiveoutsource.co.uk

The DPO is responsible for overseeing data protection practices within Inclusive Outsource LTD and ensuring compliance with the GDPR.

13. Monitoring and Review

This policy will be reviewed annually or sooner if required by changes in legislation or business needs. Inclusive Outsource LTD will continue to monitor and improve its data protection practices to ensure compliance with GDPR and best practices for data privacy.