

Crea8ing Careers Data Protection Policy

Policy statement

Crea8ing Careers is committed to a policy of protecting the rights and privacy of individuals, voluntary and community group members, volunteers staff and others (data subjects) in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR). The policy applies to all voluntary and community group members and staff at Crea8ing Careers. Any breach of the GDPR or Crea8ing Careers Data Protection Policy is considered to be an offence and, in that event, disciplinary procedures apply.

As a matter of good practice, other organisations and individuals working with Crea8ing Careers, and who have access to personal information, will be expected to have read and complied with this policy. It is expected that any staff who deal with external organisations will take responsibility for ensuring that such organisations sign a contract agreeing to abide by this policy.

Legal Requirements

Data are protected by the GDPR. The GDPR's purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is processed without their consent.

The Acts requires us to register the fact that we hold personal data and to acknowledge the right of 'subject access' – individuals, voluntary and community group members, volunteers staff and others must have the right to copies of their own data.

Managing Data Protection

We will ensure that our details are registered with the Information Commissioner.

Purpose of data held by Crea8ing Careers

Data may be held by us for the following purposes:

1. Staff administration
2. Fundraising
3. Realising the objectives of the social enterprise
4. Accounts & records
5. Advertising, marketing & public relations
6. Information and databank administration
7. Journalism and media
8. Processing for not for profit organisations
9. Research
10. Volunteers

Data Protection Principles

In terms of the GDPR, we are the 'data controller', and as such determine the purpose for which, and the manner in which, any personal data are, or are to be, processed. We must ensure that we have:

1. Fairly and lawfully processed personal data

We will always put our logo on all paperwork, stating our intentions on processing the data and state if, and to whom, we intend to give the personal data. Also provide an indication of the duration the data will be kept.

2. Processed for limited purpose

We will not use data for a purpose other than that which we advise the data subjects. Also, external organisations must state the purpose of processing, agree not to copy the data for further use and confirm that they will abide by GDPR and Creating Career's Data Protection Policy.

3. Adequate, relevant and not excessive

Creating Career's will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held. If data given or obtained are excessive for such purpose, they will be deleted or destroyed.

4. Accurate and up-to-date

We will update data subjects' personal data when we are advised of the relevant changes. All amendments will be made, and data no longer required will be deleted or destroyed. It is the responsibility of individuals and organisations to ensure the data held by us are accurate and up-to-date. Completion of an appropriate form (provided by us) will be taken as an indication that the data contained are accurate. Individuals should notify us of any changes, to enable personnel records to be updated accordingly. It is the responsibility of Creating Careers to act upon notification of changes to data, amending them where relevant.

5. Not kept longer than necessary

We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us once we determine that it is no longer of use.

6. Processed in accordance with the individual's rights

All individuals that Creating Careers hold data on have the right to:

- Be informed upon the request of all the information held about them within 30 days.
- Prevent the processing of their data for the purpose of direct marketing.
- The removal and correction of any inaccurate data about them.

7. Secure

Appropriate technical and organisational measures shall be taken against

unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

Creating Careers computers are password protected, which allow only authorised personnel to access personal data. Passwords on all computers are changed frequently. All personal and financial data is kept in a locked filing cabinet and can only be accessed by authorised personnel. When laptop computers are used out of the office care should always be taken to ensure that personal data on screen is not visible to strangers.

8. Not transferred to countries outside the European Economic Area, unless the country has adequate protection for the individual.

Data will not be transferred to countries outside the European Economic Area without the appropriate safeguards being put in place.