



## Data Protection Policy

### **Introduction:**

Tir Coed holds certain information about living individuals which is defined as personal data under the Data Protection Act 1998. This policy sets out the basis on which any personal data collected from an employee, contractor, referral or volunteer will be used by Tir Coed. Tir Coed's aim is to adhere to the Data Protection Act of 1998.

### **Responsibilities:**

This Policy will be brought to the attention of everyone who works with and for Tir Coed, including Board members, staff, contracted Service Providers and volunteers. The responsibility for implementing this policy lies with the Tir Coed Project Officers.

Personal information must be:

- Used lawfully and accurately;
- Used only for specified and compatible purposes;
- Kept secure, accurate and up to date;
- Relevant, not excessive and retained for no longer than necessary;
- Used in accordance with the rights of the individual whose personal information is being held.

### **Specific Working Practices and Commitments:**

1. Consent to collect personal data shall be lawfully and informatively collected at the start of each project or contract by means of a fair processing notice.
2. The personal data collected will only be that which is necessary for the project/contract for the duration of the project/contract.
3. Tir Coed recognises that research documents such as published statistics are within the public domain and are therefore not required to be held in a secure manner.
4. Completed project/contract data will be kept as archive material. Therefore all data will be accurate to the time that the project/contract was live. Tir Coed seeks to obtain accurate and clear data for the duration of the live project/contract.

5. All projects/contracts or research documents that contain personal data will be open for the client to inspect at their request.
6. Staff records and all personal data will be held within secure filing cabinets within the two locked premises of Tir Coed.
7. Personal data will only be accessed by those members of staff that are working on the project/contract at the appropriate time.
8. At all times and in all places the Tir Coed Project Officers will retain the confidentiality of personal records.
9. Tir Coed Project Officers will ensure that data held electronically and equipment which holds electronic data, such as laptops, is never left vulnerable to theft, particularly in public places.
10. Disposal of personal data:
  - a) Paper files to be shredded;
  - b) Electronic files to be deleted.
11. The consent of a project participant (or, in the case of minors, the participant's guardian) to use their name and/or photograph for Tir Coed publicity or promotional purposes will be obtained in advance. This permission will be in written form.
12. Personal data will not be forwarded to any third party unless specific permission has been given.
13. All personal data will remain within the United Kingdom.

#### Document Retention:

File Type:	Retention Period (in years)
<i>Accounting &amp; Finance:</i>	
Annual report and Audited Accounts (signed)	Permanently
Accounting records	6 (from year's end)
Budgets	6
Internal financial reports	6
PAYE	6
Payroll	6
Annual Report & accounts (unsigned)	6
Banking records	6
<i>Contracts:</i>	
Private sector funding	6
Public sector funding	8
Personal profile & survey forms	8
<i>Human Resources:</i>	
Job applications & interview records	12 months after notification

Employment terms, conditions & contracts	6 (after employment ends)
Personnel & training records	6 (after employment ends)
Travel & subsistence claims	6
Annual leave forms	2
Payroll and wage records, including details on expenses	6 (from the year end)

**Monitoring:**

Tir Coed will monitor the application of this policy on a six monthly basis to ensure that its practices comply with the requirements of the Policy. The Project Officers will report on any major issues arising in relation to the policy in their regular reports to the Board.

**LAST REVIEWED**

DATE: 25/09/15

SIGNED: 

POSITION: Vice Chair

on behalf of Tir Coed Board of Directors

