

Data Protection Policy

Data protection principles

Media Savvy CIC is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR).

Article 5 of the GDPR requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to incompatible with the initial purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

General provisions

This policy applies to all personal data processed by Media Savvy CIC. The organisation will monitor ongoing compliance with this policy. Media Savvy CIC shall register with the Information Commissioner's Office (ICO) as an organisation that processes personal data.

Personnel records

The regulations apply equally to volunteer and staff records. Media Savvy CIC may at times record special categories of personal data with the volunteer's consent or as part of a staff member's contract of employment.

For staff and volunteers who are regularly involved with vulnerable adults, it will be necessary for the organisation to apply to the Disclosure & Barring Service to request a disclosure of spent and unspent convictions, as well as cautions, reprimands and final warnings held on the police national computer. Any information obtained will be dealt with under the strict terms of the DBS Code. Access to the disclosure reports is limited to the Senior Management Team.

Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, Media Savvy CIC shall maintain a Register of Systems. The Register of Systems shall be reviewed at least annually. Individuals have the right to access their personal data and any such requests made to the organisation shall be dealt with in a timely manner.

Lawful purposes

All data processed by Media Savvy CIC will be done on one of the following lawful bases:

- Consent
- Contract
- Legal obligation
- Vital interests, public task or legitimate interests

Further information can be found on the Information Commissioners Office website www.ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing

Media Savvy CIC will ensure where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available and systems should be in place to ensure such revocation is reflected accurately in our processes.

Data minimisation

We will ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. This may be for example, for our funders to provide learning opportunities or providing commercial services.

Accuracy

Media Savvy CIC will take reasonable steps to ensure personal data is accurate. Where necessary for the lawful basis on which data is processed, steps shall be put in place to

ensure that personal data is kept up to date. We ensure the accuracy of any personal data we create. Media Savvy CIC will comply with the individual's right to rectification and carefully consider any challenges to the accuracy of the personal data. As a matter of good practice, we keep a note of any challenges to the accuracy of the personal data.

Archiving and removal

To ensure personal data is kept for no longer than necessary, Media Savvy CIC will put in place an archiving policy for each area in which personal data is processed and review this process annually. The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

Media Savvy CIC shall ensure that personal data is stored securely using modern software that is kept-up-to-date. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. When personal data is deleted this will be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions will be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Media Savvy CIC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.