

# Springboard Opportunity Group Data Protection Policy



## Background

Data Protection is an integral part of all Springboard procedures and processes and will be considered in the design of all materials.

We comply with the Data Protection Act 1998 and General Data Protection Regulation (GDPR) 2018. The Information Commissioner's Office (ICO) is the regulatory body.

Springboard are registered with the ICO: Registration Number: Z558553X  
Springboard Data Controller (main contact registered with ICO) is  
Liz Smith, Business Manager:  
[liz@springboardweb.org.uk](mailto:liz@springboardweb.org.uk)  
01275 341113

We process personal and confidential information about the children we work with and their families, staff, volunteers and settings supported through the Inclusion service. Privacy statements are issued to specify how and why we process data. These statements, in Appendix 1, may be updated as required without necessitating Trustee approval, to improve our practice.

We ensure that we collect, hold, use, share and eventually dispose of this information sensitively, appropriately and legally

In doing this we will follow the GDPR 'principles of processing'

- Processing will be fair and lawful, transparent and specific (purpose limited)
- Data held will be adequate, relevant, limited to what is necessary, accurate and rectifiable, retained for no longer than necessary
- We will ensure Integrity and confidentiality

We must have a legal basis for collecting data, which will be one or more of the GDPR 'conditions to processing':

- Consent
- Necessary for contract
- Legal Obligation
- Vital Interests
- Lawful authority, in the public interest
- Legitimate interest

## Subject access requests

Individuals are entitled to request a copy of their data held by Springboard. Information will be provided in an electronic form within one month of the request and without charge. Subject access requests will be handled by the data controller. In some circumstances legal advice may be sought and requests declined.

## Making a Complaint

If a data subject feels their data has been misused or not kept secure, the data controller should be contacted. The Springboard complaints procedure can be initiated (policy available on request or on Springboard website: [www.springboardweb.org.uk](http://www.springboardweb.org.uk) )

If the response/outcome is not satisfactory, or for advice, the Information Commissioner's Office (ICO) should be contacted:

[casework@ico.org.uk](mailto:casework@ico.org.uk)

Telephone: 0303 123 1113

Information Commissioner's Office

Wycliffe House Water Lane

Wilmslow

Cheshire

SK9 5AF

## Security, retention and destruction

Documents and records (hard copies and electronic) are stored and eventually destroyed according to Springboard's 'Retention, Storage and Security of Documents and Records Policy'.

Any security breach will be reported to the ICO within 72 hours. This includes accidental or unlawful destruction, loss, alteration, disclosure or access to personal data. If the breach is unlikely to risk subjects rights or freedoms it will not be reported, but logged internally.

## Right to be forgotten

In some circumstance a data subject can ask for information about them to be erased. The data controller will respond to any request and comply with GDPR.

## Rectification

All information held must be accurate, and to this end Springboard will regularly update records.

This policy was adopted at a meeting of Springboard Opportunity Group's Board of Trustees	
Held on	27.11.18
Date to be reviewed	November 2021 (or earlier if there is a change of Data Controller)
Signed on behalf of the Board of Trustees	
Name of signatory	Louise Petersen
Role	Chair of trustees