**Privacy and Data Protection Policy**

1. **Aims**
   1. In order to retain public trust, an excellent reputation and compliance with the law, we will take reasonable steps (appropriate for a charity of our resources) to ensure that:
      1. all confidential information will be securely held and processed;
      2. data will only be used for specific and limited purposes;
      3. data will be destroyed after an appropriate period of retention;
      4. no unauthorised user will gain access to the data;
      5. IT systems and software and our website will include appropriate security measures;
      6. individuals are entitled to know and can access the information we hold about them.
2. **Scope**
   1. This policy applies to all our activities including:
      1. the operation of the Charity;
      2. membership and loans/hire data;
      3. any other personal information;
      4. confidentiality;
      5. our website(s);
      6. copyright information.
   2. It applies to all recorded information held by us in any format.
   3. It excludes revealing:
      1. contact information about individuals in their capacity as Trustees, Management Committee members, employees, volunteers or other agents of the Charity;
      2. information which is commercially or operationally sensitive.
3. **Areas of Relevance**

Personal Information

* 1. We collect the following information either on paper for entry to our computer system or on our website:
     1. personal details you submit such as name, address, email address and telephone number. These details are used to process your application for membership and to process your use of our services (loans or hiring) and may include information about your children;
     2. personal details you provide in relation to ethnic background, relevant disabilities, socio-economic and demographic data;
     3. personal details of other non-members who have provided them in order to maintain contact with us.
  2. You can update your personal information by emailing us, or by informing the person on duty in our premises.
  3. We will:
     1. supply you with a copy of your personal information we hold about you, at your request (but not information about any services used);
     2. make data available to third parties (including our IT providers) but only for the purposes of backing up data, analysis or otherwise in the course of our operations;
     3. only disclose your data to an appropriate authority without your consent where we are obliged to comply with a legitimate request under the Data Protection Act 1998, or for the purposes of safeguarding children or adults at risk;
     4. not disclose your name and address with the data we collect for statistical purposes;
     5. provide summary data to our sponsors and funders in keeping with our charitable objects;
     6. retain your IP address (your computer’s individual identification number) and other data which allows us to recognise how you use our website(s), in order to better understand use and to improve our service.

Privacy and Confidentiality

* 1. We respect your right to privacy. Apart from the exceptions listed above:
     1. any personal details received by us will only be used by us in connection with our services;
     2. we do not sell or give away your private information to any third party except as detailed in this policy;
     3. our Trustees, Management Committee members, staff and volunteers have a certain duty of confidentiality not to reveal your circumstances.
  2. Please be aware that:
     1. CCTV is in constant use by Lewisham Shopping Centre for security purposes. It monitors and records entry to and exit from our premises and other areas;
     2. we do not permit photography or video recording on our premises in order to protect children and adults at risk except where we have sought relevant permission.

Our Website

* 1. The content of our website is intended for general information purposes only. No responsibility is taken for any loss as a result of any action taken or refrained from as a consequence of the contents of our website.
  2. We do not accept any liability for the content or performance of a third party website accessed through our website, nor endorse nor approve the contents of any such site.
  3. We do not give warranty that our website is free from viruses or anything else which may have a harmful effect on any technology.

Copyright

* 1. The material contained in our website (“this material”), including text and graphics, and all software compilations, underlying source code and software (including applets) is under copyright. All rights are reserved.
  2. None of this material may be reproduced or redistributed without written our permission. You may however download or print a single copy for your own non-commercial off-line viewing. You may also use our website address to refer others to the site.

1. **Procedure**
   1. Subject to the Data Protection Act 1998 we will:
      1. provide members, staff and stakeholders with copies of our meeting agendas, minutes, reports, policies and other formal documentation, either as a matter of course or on written application;
      2. provide individual members with access to information held about them on written application;
      3. aim to provide such information within 15 working days;
      4. only charge for the provision of such information if more than 2 pages are printed or copied to fulfil the request;
      5. advise or assist members to make a request for information;
      6. copy and distribute the abbreviated or complete version, as required, of the Charity’s annual financial statements (accounts) to members, staff and stakeholders and by request;
      7. compile and publish on our website an annual report of the Charity’s activities and performance which aims to comply with the requirements of the Charity Commission;

Access to Your Information

* 1. If you wish to obtain information about yourself, then the Data Protection Act 1998 applies and you should make a subject access request.
  2. We will keep records of written requests for information and will monitor the operation of this policy periodically. We will keep legislation under review.
  3. Under the Act we are currently not required to be registered as a data provider.

1. **Monitoring and Review**
   1. A designated Management Committee member is responsible for monitoring data protection and freedom of information issues and for reporting with recommendations as data protection or freedom of information issues arise or at least annually.
2. **Responsibilities**
   1. The Toy Library Manager has responsibility for:
      1. records management both computer and paper-based, including deletion and destruction;
      2. disclosing information in accordance with this policy and relevant legislation at the direction of the Management Committee;
      3. maintaining records of disclosure;
      4. conforming to our own code of conduct which requires confidentiality about individuals and about aspects of the Charity’s business;
   2. The Management Committee is responsible for:
      1. this policy and its implementation and review;
      2. determining whether to disclose information in accordance with this policy and relevant legislation;
      3. creating a climate of openness;
      4. conforming to our own code of conduct which requires confidentiality about individuals and about aspects of the Charity’s business.
3. **Relevant Legislation**
   1. This policy complies with the provisions of the:
      * Data Protection Act 1998,
      * Directive on Privacy and Electronic Communication (Directive 2002/58/EC of July 2002) and
      * Freedom of Information Act 2000.

7.2 Also relevant to this policy are the:

* + - Data Sharing Code of Practice (Information Commissioner’s Office)
    - Information sharing: advice for practitioners providing safeguarding services (guidance from the Department for Education)

1. **Related Documentation**

Safeguarding Policy

Codes of Conduct

Membership Forms

**Adopted:**

**Reviewed:**

**Date of next review:**