

Home-Start Aberdeen General Data Protection Regulations compliance statement

About Home-Start

Home-Start is one of the leading family support charities in the UK. Home-Start volunteers help families with children deal with the challenges they face. We support parents as they learn to cope, improve their confidence and build better lives for their children.

Information Commissioners Office (ICO) Registration

Home-Start Aberdeen has registered with the Information Commissioners Office (ICO) under registration reference Z9313287

Our Commitment

Home-Start Aberdeen are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Home-Start Aberdeen are dedicated to safeguarding the personal information and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How we are preparing for the GDPR

Home-Start Aberdeen already have a consistent level of data protection and security across our organisation, however it is our aim to be fully compliant with the GDPR by 25th May 2018. *Our preparation includes:* -

Information Audit

We will regularly carry out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed. Data Protection Impact Assessments (DPIA) have helped us develop stringent procedures and assessment templates for carrying out impact. We have implemented documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).

Policies and procedures

We have revised our data protection policies and procedures to meet the requirements and standards of the GDPR including data protection, IT security, data retention and erasure, data breaches and third party transfers and disclosures.

Home-Start Aberdeen have designated Anne MacDonald as our Data Protection Officer and we have prompted awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures. (Agreed at Board Meeting 22.5.2018)

Home-Start Aberdeen understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans, induction and annual training program. Staff will be given annual GDPR updates as a Quality Assurance requirement.

Subject Access Request (SAR)

We have introduced SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.

Privacy Statement/Policy

We have revised our Privacy Statement(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights

are, who the information is disclosed to and what safeguarding measures are in place to protect their information.

Data Transfer Statement

We have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. Home-Start Aberdeen will at times, on an anonymised basis, use personal information to demonstrate the impact of our services. Any case study information shared, will always be on an anonymised basis unless we have further explicit consent from individuals.

Home-Start Aberdeen may use data for specific purposes of statistical analysis and the promotion of our work nationally as well as any reporting requirements for funders who support the network on a national level.

Home-Start Aberdeen will share personal information with law enforcement or other authorities if required by applicable law (including, in line with our Safeguarding and Promoting the Welfare of Children/Safeguarding Adults at risks policies, where there are concerns about the safety or wellbeing of a child or adult at risk and it is considered necessary for their welfare and protection).

Home-Start Aberdeen will not share your personal information with any other third party without first obtaining your explicit consent.

Direct Marketing/Fundraising

We have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions. This includes a clear method for opting out and providing unsubscribe features on all subsequent marketing materials.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information via [our website, in the office, during induction etc] of an individual's right to access any personal information that Home-Start UK processes about them and to request information about: -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete/inaccurate data corrected or completed and the process for requesting this
- The right to request erasure of personal data (*where applicable*) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

Right to be Forgotten/Subject Access Request

We have a right to erasure process. If you wish to be erased, please contact us via admin@homestartaberdeen.org.uk or 01224 693545 for our Subject Access Request information.

If you have any questions about our preparation for the GDPR, please contact our Data Protection Officer Anne MacDonald, Tel: 01224 693545 Email: admin@homestartaberdeen.org.uk

Information Security Measures (I.T.)

Home-Start Aberdeen takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including: -

Encryption & Data Access

Home-Start Aberdeen supports various encryption methods to protect the transition of data over both trusted and untrusted networks. Various technical security measures are also used including firewalls, VPNs, enterprise-grade antivirus, and auditable internet use. The organisation obtains destruction certificates when hard drives containing personal data are destroyed.

Backups (off-site)

An automatic backup is taken of customer data every week and is held both locally and remotely within the same geographical region. Backups of customer data are kept in line with Home-Start retention of records policy which meets all GDPR requirements.

Managing vulnerabilities

Home-Start Aberdeen tests, discover, investigate and fix vulnerabilities and perform regular vulnerability tests.

Access control (IT)

Employees are required to sign Confidentiality Statements (HR contract) upon joining Home-Start Aberdeen and are required to undertake annual training. Access to data is highly restricted and is governed by access rights approved by managers.

Decommissioning

When a data storage device has reached the end of its useful life, Home-Start Aberdeen destroys data as part of a decommissioning process. All devices are destroyed in accordance with industry-standard practices.

Compliance certifications

Third-party certifications and audits are an important component of any mature security program.

Password Policy

All passwords are stored within the scheme's "blue book" which is kept locked in cabinet 2. This policy has been risk assessed and found to be acceptable to the scheme as at May 2018.

Monitoring & Evaluation System Home-Start (MESH)

Home-Start Aberdeen use an internal data capture system to track outcomes based around the work local Home-Starts undertake with families they are supporting. With a limited amount of personal data included Home-Start Aberdeen take the following measures to ensure a high level of security within the system.

Access control

Access to data within MESH is governed by access rights. Privileges can be configured and managed to define multi-level access rights.

Authentication

Users are authenticated through username and password which is cross checked against an SQL (Structured Query Language) table within which the data is encrypted.

Auto logout

After 30 minutes of inactivity a user is automatically logged out of MESH.

Layered Security

MESH has multi-level access procedures including a 3-level username, scheme code and password protection process.

Password

Complexity rules are issued and validated – users MUST use 8-15 characters, at least one uppercase and one lowercase letter of the alphabet and one numerical digit.

Lockouts

Failed authentication lock-outs are embedded. After 3 failed attempts users are given a CAPTCHA in addition to the standard 3-level authentication process to prevent phishing. After 10 failed attempts users are locked out of MESH for 30 minutes after which the system re-sets.

Forgotten username or password

Home-Start Aberdeen has configurable built-in support to enable local administrators to enable and reset sub-user credentials and give limited access and exclusion to local staff and Trustees. Administrators can control number of users but administrator rights are maintained and secured by Home-Start UK.

3rd Party Usage

All data collected by MESH is consented to an anonymization process in order for 3rd party statistical analysis. 3rd parties are mandated to provide their own signed GDPR compliance statements and privacy policies.

Development

New functionality is project planned by Home-Start UK's MESH Development Group who prioritise additions and changes to the system. Work is planned and authorised within agreed resources and timescales.

Programming & Testing

Development and programming is undertaken by the MESH Systems Developer. Manual testing and assessment is conducted by the Developer and Home-Start UK's Knowledge Transfer Team leading up to release within Home-Start's network. Development is conducted on an alternative server to live data to ensure a safe testing environment and full security.

Implementation

On completion of testing, users are informed of planned system maintenance and scheduled release dates which are issued to them via Home-Start UK's intranet.

FUNDRAISING & WEBSITE

The full Home-Start Aberdeen Privacy Statement on our website:

www.homestartaberdeen.org.uk

We are committed to safeguarding the privacy of our website visitors. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

Payments

Home-Start Aberdeen will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

Financial Donations

All Home-Start's website financial transactions are handled through our payment services provider, Virgin Money Giving. You can review the provider's privacy policy at <https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp>. We also offer mechanisms to donate via Facebook, You can review Facebook's privacy policy at <https://www.facebook.com/terms.php>. Also Text Giving is handled through Just Giving and their privacy policy can be reviewed at <https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v21>

Direct Debits

Direct Debits transactions are all dealt with through our bank which is Clydesdale Bank plc, Queens Cross Branch, Aberdeen. AB15 4XU

Disclosing personal information

Home-Start Aberdeen may disclose your personal information to any of our employees insofar as reasonably necessary to the extent that we are required to do so by law, in connection with any ongoing or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

Retention

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes to the extent that we are required to do so by law.

Cookies

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website. We use both session and persistent cookies on our website and Google Analytics to analyse the use of our website which generates statistical and other information about website use by means of cookies.

HUMAN RESOURCES

HR records

The ICO has issued an [employment practices code](#) which Home-Start Aberdeen follows for (1) Recruitment and Selection (2) Employment Records (3) Monitoring at Work and (4) Information about Workers' Health. The retention checklist is divided into two parts (1) statutory & (2) non-statutory with recommended retention periods followed to CIPD industry standards.

Office Security

The Home-Start Aberdeen office is kept as secure as possible, with locked doors and a security entry system in place.

Access

All staff have keys to the building and there is a designated open up and lock up procedure in our staff manual.

Office Maintenance

The offices are managed by agents employed by our head landlords and cannot access without permission.

Employment

Employee files and the data within are kept in lockable cabinets at the Home-Start Aberdeen offices at 1a Alford Place, Aberdeen. AB10 1YD. They can only be accessed by the DESIGNATED PERSON(S) who holds the sole keys for the cabinet.

Right to be Forgotten/Subject Access Request

We have a right to erasure process. If you wish to be erased, or to withdraw processing consent, or delete/correct info then please contact please contact Home-Start Aberdeen via admin@homestartaberdeen.org.uk or 01224 693545 for our Subject Access Request information.

Breach Notification

We have a notification process in place for any breach. For further details on this, please contact Home-Start Aberdeen via admin@homestartaberdeen.org.uk or 01224 693545 for our breach information and procedures.