

## **Confidentiality and Data Protection Policy**

1. Aberdeenshire Community Recovery will respect a person's right to confidentiality. All personal information regarding individuals will be treated as confidential. This covers both verbal and all forms of recorded information.
2. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.
3. Data protection is about how we, as Aberdeenshire Community Recovery, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

## **Responsibility**

1. Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.
2. All members are responsible for adhering to this policy, and related procedures, in all areas of their work for Aberdeenshire Community Recovery.

## **Data Protection Statement**

1. Aberdeenshire Community Recovery need to keep records of personal data about its committee, members and supporters in order to carry out Aberdeenshire Community Recovery activities.
2. All records are regarded as highly confidential. Great care will be taken to ensure that the security and safe keeping of such information is maintained.
3. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
4. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
5. We will only collect, store and use data for:
  - purposes for which the individual has given explicit consent, or
  - purposes that are in our Aberdeenshire Community Recovery's legitimate interests, or
  - to comply with legal obligations, or
  - to protect someone's life, or
  - to perform public tasks.

6. We will provide individuals with details of the data we have about them when requested by the relevant individual.

7. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.

8. We will endeavour to keep personal data up-to-date and accurate.

9. We will store personal data securely.

10. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

11. We will not share personal data or confidential information with unauthorised third parties, including family members or members of the public, without the explicit consent of the relevant individual, unless legally required to do so. This may be in the following circumstances:

- when non-disclosure would pose a serious risk to the welfare of a child or vulnerable adult, or the safety of a member or some other person

12. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

13. To uphold this policy, we will maintain a set of data protection procedures for our committee and members to follow. Serious confidentiality or data protection breaches could lead to cancellation of membership

### **Data protection procedures**

In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases, we will ensure our Data Protection Policy is upheld.

### **General procedures**

1. Data will be stored securely. When it is stored electronically, it will be kept in files and only shared with those authorised to see them.
2. When it is stored online in a third party website, we will ensure the third party comply with the GDPR.
3. When it is stored on paper it will be filed carefully in a locked filing cabinet.
4. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
5. We will keep records of consent given for us to collect, use and store data.

These records will be stored securely.

### **Mail Distribution list**

1. We will maintain a mail distribution list. This will include the names and contact details of people who wish to receive publicity and information from Aberdeenshire Community Recovery or third-party information screened for appropriateness and distributed via our mailing list.
2. When people sign up to the list, we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time.
3. The mailing list is confidential and will only be accessed by authorised Aberdeenshire Community Recovery members. Any mailings distributed to people on the mailing list will be distributed by using the blind copying way, so email address details can't be seen by others receiving this email.
4. We will not use the mailing list in any way that the individuals on it have not explicitly consented to.
5. We will regularly provide information about how to be removed from the list.

### **Aberdeenshire Community Recovery Activities**

1. From time to time, Aberdeenshire Community Recovery organise activities for the community. We will collate personal data from individuals signing up for those activities for organisational purposes and in order to adhere to health and safety procedures.
2. We will not keep information relating to an individual's personal situation for any longer than is necessary for the purpose of the activity.
3. We may take photographic, video or audio records at activities for the purpose of promoting our work to the public. No such records will be taken or published without the explicit written consent of the individuals shown.

### **Contacting management committee members**

1. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
2. Committee contact details will be shared among the committee.
3. Committee members will not share each other's' contact details with anyone outside of the committee or use them for anything other than Aberdeenshire Community Recovery business, without explicit consent.

### **Aberdeenshire Community Recovery meetings**

1. Aberdeenshire Community Recovery are public meetings and a written record of the meeting will be taken and made available publicly. This will include the names of attendees.
2. Attendees not wishing their attendance to be publicised by name may approach the secretary for an anonymised record of their attendance.
3. No confidential information relating to any individual will be discussed or shared at Aberdeenshire Community Recovery meetings without the explicit consent of the individual to do so.
4. Information declared as confidential and shared at a Aberdeenshire Community Recovery meeting will not be minuted.
5. At times video records of meetings held online may be taken with the consent of those attending. These are taken only to aid the minuting process and will not be shared with other membership or third parties unless all attendees agree to do so.

If members are unsure about any issue relating to confidentiality, data protection, breaking confidentiality or 'keeping a secret' they should contact a committee member or Aberdeenshire Community Recovery support worker.