

CONFIDENTIAL
CHILDREN IN CROSSFIRE
DATA PROTECTION POLICY

Children in Crossfire is required to collect and use certain types of information about individuals who come into contact with the organisation. This personal information must be dealt with appropriately and sensitively, regardless of the method by which it is collected, recorded and used - whether on paper, via computer, or recorded on other material - and there are safeguards to ensure this in line with the Data Protection Act.

The lawful and correct treatment of personal information is critical to Children in Crossfire. To this end the organisation fully endorses and adheres to the EU Directive on General Data Protection Regulation (GDPR) and the updated Data Protection Act 2018, the Privacy & Electronic Communications (EC Directive) Regulations 2003 and the Freedom of Information Act 2000.

Specifically, the Principles require that personal information:

- shall be processed fairly and lawfully and in particular, shall not be processed unless specific conditions are met;
- shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- shall be accurate and, where necessary, kept up to date;
- shall not be kept for longer than is necessary for that purpose or those purposes;
- shall be processed in accordance with the rights of data subjects under the Act;
- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to personal data;
- shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

CIC will, through appropriate management, strict application of criteria and controls:

- observe fully, conditions regarding the fair collection and use of information, and meet all of its legal obligations;
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- ensure the quality of information used;
- apply strict checks to determine the length of time information is held;
- ensure that the rights of people about whom information is held, can be fully exercised;
- take appropriate technical and organisational security measures to safeguard personal information;
- ensure that personal information is not transferred abroad without suitable safeguards;
- treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information and set out clear procedures for responding to requests for information.

In addition, CIC will ensure that:

- there is someone with specific responsibility for Data Protection;
- everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice, that they are appropriately trained to do so and that they are appropriately supervised;
- anybody wanting to make enquiries about handling personal information knows what to do;
- queries about handling personal information are promptly and courteously dealt with;
- methods of handling personal information are clearly described;
- a regular review and audit is made of the way personal information is held, managed and used;
- methods of handling personal information are regularly assessed and evaluated;
- performance with handling personal information is regularly assessed and evaluated;

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act.

Breaches of this policy may result in the company's disciplinary and dismissal procedures being invoked which could lead to termination of employment.