



# Data Protection Procedure

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## Copenhagen Youth Project (CYP)

Last Updated:	1 <sup>st</sup> August 2021
Approved by Trustees:	31 <sup>st</sup> August 2021
Review Date:	August 2022

## Statement

Copenhagen Youth Project (CYP), the Data Controller needs to use certain types of personal information on for example Youth members and Parents and others with whom it communicates. In addition, it may occasionally be required by statute to collect and use certain types of information to comply with the requirements of external bodies.

CYP recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation 2017

CYP fully endorses and adheres to the eight principles of the GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for CYP must adhere to these principles.

## The Principles

The principles require that personal data shall:

1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
2. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
3. Be adequate, relevant and not excessive for those purposes.
4. Be accurate and where necessary, kept up to date.
5. Not be kept for longer than is necessary for that purpose.
6. Be processed in accordance with the data subject's rights.
7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
8. 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.

**Data Officer:** If you have any queries please contact our Data Officer:

Name:	Position:	Contact:
Theo Thomas	Finance & Personnel Manager	<a href="mailto:theo@cyproject.org">theo@cyproject.org</a>

## Maintaining Confidentiality

CYP will treat all your personal information as private and confidential and not disclose any data about you to anyone other than the Trustees of CYP to facilitate the administration and day-to-day running of the project. All CYP staff and volunteers who have access to Personal Data will be required to agree to sign a Confidentiality Policy and a Data Protection Policy.

There are four exceptional circumstances to the above permitted by law:

1. Where we are legally compelled to do so.
2. Where there is a duty to the public to disclose.
3. Where disclosure is required to protect your interest.
4. Where disclosure is made at your request or with your consent.

## Use of Personal Information

CYP will use your data for three main purposes:

1. The day-to-day administration of CYP. We work in liaison with relevant professionals and agencies outside the project to meet children's specific needs. We will only share information if requested by law.
2. Contacting you to keep you informed of CYP activities and events and external activities that we think may be of interest to you.
3. Statistical analysis; gaining a better understanding of CYP demographics.

N.B. although collated CYP data may be passed to a third party (funders), such as number of small groups or small group's attendance, no personal data will be disclosed.

### **Upshot Database**

Information contained on the database will not be used for any other purposes than set out in this section. The database is accessed through the cloud and therefore, can be accessed through any computer or smart device with internet access. The server for the database is maintained and held by the Football Foundation.

1. Access to the database is strictly controlled through the use of name specific passwords, which are selected by the individual.
2. Those authorised to use the database only have access to their specific area of use within the database. This is controlled by the Data Controller and other specified administrators. These are the only people who can access and set these security parameters.
3. People who will have secure and authorised access to the database include CYP Staff & data in-putters (Mentors & Volunteers).
4. The database will NOT be accessed by any authorised users outside of the UK, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.
5. All access and activity on the database is logged and can be viewed by the Database Controller.
6. Subject Access - all individuals who are the subject of personal data held by CYP are entitled to:
  - Subject Consent - The need to process data for normal purposes has been communicated to all data subjects. Ask what information CYP holds about them and why.
  - Ask how to gain access to it.
  - Be informed how to keep it up to date.
  - Be informed what CYP is doing to comply with its obligations under the 1988 Data Protection Act.
7. Personal information will not be passed onto any third parties outside of CYP.

### **Rights to Access Information**

Employees and other subjects of personal data held by CYP have the right to access any personal data that is being held in certain manual filing systems. This right is subject to certain exemptions. Personal Information may be withheld if the information relates to another individual.

Any person who wishes to exercise this right should make the request in writing to the CYP Data Officer, using the standard letter which is available online from [www.ico.gov.uk](http://www.ico.gov.uk).

If personal details are inaccurate, they can be amended upon request.

CYP aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

**Data protection Policy understanding and acceptance:**

Name:

Position/ role:

Dept:

I function in the roles below (please circle those that are applicable)

Staff member / Data input team member (Mentor or Volunteer)

I have read and understood this policy and agree to adhere to its contents.

Signed:

Date: