



## **Data Protection Policy (GDPR)**

### **Purpose of Document**

This policy outlines the expectations of the Hearing Voices Network Dundee (SCIO) with regards confidentiality and the sharing of personal and sensitive personal data for all workers, paid and unpaid, and those who use the services the Haven provide.

### **Types of data**

Hearing Voices Network Dundee (SCIO) holds both personal and sensitive personal information about workers, paid and unpaid, and those who use the services the Haven provide.

Examples of personal data are;

- Name, address, postcode, date-of-birth, email address, and telephone number
- Copies of other forms of identification such as passport, PVG disclosure, national insurance number, driving licence, bus pass

Examples of sensitive personal data are;

- someone's racial or ethnic origin, political opinions, and religious beliefs, whether they are a member of a trade union
- their physical or mental health or condition, sexual life
- offences or alleged offences and any related court proceedings.

### **Policy**

Hearing Voices Network Dundee (SCIO) respects the right of every person to a private and family life as stated in the Human Rights Act 1998. We will therefore share, store, process, record and dispose of personal and sensitive personal information in accordance with General Data Protection Regulation and the Data Protection Act 2018.

## **Sharing information**

We will not share sensitive personal information about a person unless we have explicit consent from the person. However, there are times when we may have to share information about a person to a third party. These situations may occur in the following situations

- The person poses a risk to themselves and or someone else and the information may indicate an Adult Support and Protection concern or a Child Protection concern.
- We are legally requested to do so

If such a situation arises, then the person responsible for disclosing that information is the Operations Manager, and local Adult Support and Protection and Child Protection policies will be followed. These can be found on the Dundee City Council Website.

Personal and sensitive person information about volunteers, befrienders, befriendees, management committee members and staff will generally not be shared with each other. However, there may be instances where information can be shared between staff and volunteers if it impacts on the person's work for Hearing Voices Network Dundee (SCIO).

The exception to this is where there may be concerns about another person, in which case these concerns can be discussed with the Operations Manager.

Breaches of confidentiality are considered to be very serious and will be dealt with through the Hearing Voices Network Dundee (SCIO) disciplinary procedure.

It should be noted that the Haven is a public place and Hearing Voices Network Dundee (SCIO) cannot therefore guarantee complete privacy. Please bear this in mind when discussing issues relating to yourself or other people.

## **Processing, Storing and Disposing of Information**

Information that we receive about people, for example referral forms, application forms, and also employee data is held in a locked office.

The office can only be accessed by a member of staff or a member of the management committee.

Staff and volunteers will not give out personal information over the phone unless they are certain of the identity of the person they are giving the information to.

Hearing Voices Network Dundee (SCIO) also holds personal information electronically. The information is password protected, and a person's information is deleted after 18 months from the last contact with the person.

Any paper records containing personal and/ or sensitive personal will be shredded.

## **Individuals' rights to Access their information**

Information held on individuals can be accessed by the person on request. We cannot share information that has been received from a third party without the consent of the third party.

## **Retention of records**

The organisation follows the retention periods recommended by the Information Commissioner in its Employment Practices Data Protection Code. For example, in the absence of a specific business case supporting a longer period, we will retain the following records for the following periods:

- Employment records for staff, trustees, and volunteers – 6 years after leaving the Haven
- Application forms and shortlisting information for people not recruited – 12 months
- Accident and injury records – 3 years
- Financial records – 6 years
- Management Board minutes – permanently

## **Review of this Policy**

This policy will be reviewed every 3 years, or when there is a change in legislation.

Date written	Date approved	Review period	Next review
29/4/25	29/4/25	3 years	29/4/28