

# Home-Start South Leicestershire

## 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 young 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 South Leicestershire has registered with the Information Commissioners Office (ICO) under registration reference Z9092735

### **Our Commitment**

Home-Start South Leicestershire 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 South Leicestershire 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.

### **Information Audit**

We will regularly carry out an 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 (DPIAs) have helped us develop stringent procedures and assessment templates. 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 South Leicestershire have designated Deborah Bennett 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.

Home-Start South Leicestershire 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 South Leicestershire 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 South Leicestershire 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 South Leicestershire will share personal information with law enforcement or other authorities if required by applicable law (including, in line with our Safeguarding and Child Protection/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 South Leicestershire 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 office, our website and during induction 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 [info@home-startsouthleics.org.uk](mailto:info@home-startsouthleics.org.uk) or 01858 467982 for our Subject Access Request information.

**If you have any questions about our preparation for the GDPR, please contact our Data Protection Officer, Deborah Bennett. Tel: 01858 467982 Email: [info@home-startsouthleics.org.uk](mailto:info@home-startsouthleics.org.uk)**

## Information Security Measures (I.T.)

Home-Start South Leicestershire 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 South Leicestershire uses password-protection and an encrypted flash drive to protect the transition of data off-site, eg for monthly back-up of server files. Technical security measures are also used including firewalls and antivirus protection.

### Backups (off-site)

A backup is taken of the HSSL server files every month and is held locally off-site in a secure location.

### Managing vulnerabilities / Risk assessments

Home-Start South Leicestershire looks carefully at IT / data vulnerabilities as part of the overall organisational risk assessment, planning mitigating action to reduce these risks.

## Monitoring & Evaluation System Home-Start (MESH)

Home-Start South Leicestershire 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 South Leicestershire 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 South Leicestershire 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.

### **3<sup>rd</sup> Party Usage**

All data collected by MESH is consented to an anonymization process in order for 3<sup>rd</sup> party statistical analysis. 3<sup>rd</sup> 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.

## **HUMAN RESOURCES**

### **HR records**

The ICO has issued an employment practices code which Home-Start South Leicestershire 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 South Leicestershire office is secured by use of locks and a burglar alarm. A key holding and alarm response service is provided by Regent Samsic Ltd.

### **Access**

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

### **Employment**

Employee files and the data within are kept in lockable cabinets at the Home-Start South Leicestershire offices at 121 Coventry Road, Market Harborough, Leicestershire LE16 9BY. They can only be accessed by the Charity Development Manager, Senior Coordinator and Charity Administrator who have access to the key.

### **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 Home-Start South Leicestershire via [info@home-startsouthleics.org.uk](mailto:info@home-startsouthleics.org.uk) or 01 858 467982 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 South Leicestershire via [info@home-startsouthleics.org.uk](mailto:info@home-startsouthleics.org.uk) or 01 858 467982 for our breach information and procedures.