



Confidentiality & Data Protection Policy

Registered Charity No. 1168134



1. Introduction

- 1.1 This policy is intended to outline the official approach that St Cuthbert's Society Junior Common Room (hereafter referred to as "the JCR") shall take in regard to confidentiality and data protection.
- 1.2 The JCR is committed to protecting the rights and freedoms of individuals in accordance with the provisions of the *Data Protection Act 2018* in line with the implementation of the General Data Protection Regulation
- 1.3 The JCR is committed to ensuring we comply with the eight data protection principles as listed below. Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.
- 1.4 The intention to share data relating to individuals to an organisation outside of the JCR shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information. Any proposed change to the processing of individual's data shall first be notified to them.
- 1.5 When collecting personal data from individuals, the JCR shall follow a process of 'active consent' ensuring individuals have the opportunity to opt out.

2. Data Protection Principles

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the *Data Protection Act 2018*.
- *Appropriate* technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- All JCR members must abide by the Durham University Data Protection Policy when they enrol and are personally responsible for ensuring that they do so.

3. Data Sharing Agreement with Durham University

3.1 Any data sharing agreement between the JCR and Durham University will be in the form of a written agreement (as per the University's policy) detailing at minimum the following:

- The classes, or specific items, of personal data to be shared
- The source(s) of the personal data
- The objective(s) of the data sharing arrangement
- The lawful basis for sharing the personal data

- The individuals/groups that will have access to the personal data
- The methods by which the personal data will be transferred, including any controls for protecting the data from loss, destruction or unauthorised access
- The frequency with which the personal data will be shared
- Storage requirements for the personal data, including any controls for protecting the data from loss, destruction or unauthorised access
- The parties' responsibilities for ensuring the accuracy of the personal data
- Retention and disposal requirements
- Arrangements for enabling data subjects to exercise their rights
- Processes and procedures for handling information security incidents.

4. Responsibilities of Volunteers and Employees

4.1 All JCR volunteers and employees must abide by the JCR Data Protection Principles.

4.2 JCR members must ensure that the personal data the JCR holds about them is accurate and up-to-date by informing the JCR of any changes or errors immediately.

5. Retention and Disposal of Records containing personal Data

5.1 Personal data will only be retained for the length of time they are required for the specific purpose they were collected.

5.2 The disposal of personal data will be carried out confidentially and completely. Where multiple copies of the data exist, all physical and electronic copies must be destroyed. Where personal data is recorded in paper form, the paper must be securely shredded or incinerated.

6. Confidentiality

6.1 No member of the JCR when acting in a JCR position may promise confidentiality 6.2 The JCR Welfare Team are trained to deal with disclosures, working with the St Cuthbert's Society Student Support Officer where necessary.

6.3 The JCR welfare team will receive training on the University Confidentiality Policy, which they will adhere to.

6.4 JCR members must act in accordance with Durham University's Respect at Work Policy, reporting any incidents that occur during events or activities run by the JCR on University grounds to the appropriate Support Officer in St Cuthbert's Society if necessary.

6.5 No guarantee of confidentiality exists between the JCR and St Cuthbert's Society Student Support Staff and College Officers.

6.6 In situations where a JCR volunteer feels that it may be necessary to break confidentiality, they should seek advice from Student Support.

7. Approval and Review

7.1 This Confidentiality and Data Protection Policy was prepared by the JCR President on behalf of the JCR Trustee Board.

7.2 This Confidentiality and Data Protection Policy will be reviewed on an annual basis by the Trustee Board in consultation with relevant parties including the JCR President and, where appropriate, Executive Committee Members.

This Confidentiality and Data Protection Policy has been approved by the JCR President and Trustee Board

Signed

Signed

Dated
Chair, JCR Trust 2019-20

Dated
JCR President 2019-20