**Sophie’s Stories**

**GDPR POLICY**

**1. Introduction**

**Sophie Marsh**needs to collect and use certain types of information about the Individuals who come into contact with **Sophie Marsh** in order to carry out her work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the GDPR (2018).

**2. Data Controller**

**Sophie Marsh**is theData Controller under the Act, which means that I determine what purposes personal information held, will be used for. I am also responsible for notifying the Information Commissioner of the data I hold or is likely to hold, and the general purposes that this data will be used for.

**3. Disclosure**

In certain circumstances Sophie Marshmay share data with other agencies such asthe local authority, funding bodies and other voluntary agencies.

The Individual will be made aware in most circumstances how and with whom their information will be shared.  There are circumstances where the law allows data to be disclosed (including sensitive data) without the data subject’s consent.

These are:

* Carrying out a legal duty or as authorised by the Secretary of State
* Protecting vital interests of an Individual/Service User or other person
* The Individual/Service User has already made the information public
* Conducting any legal proceedings, obtaining legal advice or defending any legal rights
* Monitoring for equal opportunities purposes – i.e. race, disability or religion
* Providing a confidential service where the Individual/Service User’s consent cannot be obtained or where it is reasonable to proceed without
* consent: e.g. where we would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

Sophie Marshregards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom she deals with.

Sophie Marshintends to ensure that personal information is treated lawfully and correctly.

To this end, Sophie Marshwill adhere to the Principles of Data Protection, as detailed in the GDPR (2018).

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 of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
* Shall be adequate, relevant, and not excessive in relation to those purpose(s)
* Shall be accurate and, where necessary, kept up to date,
* Shall not be kept for longer than is necessary,
* Shall be processed in accordance with the rights of data subjects under the Act,
* Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
* 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 Individuals/Service Users in relation to the processing of personal information.

Sophie Marshwill, through appropriate management and strict application of criteria and controls**:**

* Observe fully conditions regarding the fair collection and use of information
* Meet its legal obligations to specify the purposes for which information is used
* Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
* Ensure the quality of information used
* Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
* The right to be informed that processing is being undertaken,
* The right of access to one’s personal information
* The right to prevent processing in certain circumstances and
* The right to correct, rectify, block or erase information which is regarded as wrong information)
* 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
* Set out clear procedures for responding to requests for information

**4. Data collection**

Informed consent is when

* An Individual clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
* And then gives their consent.

Sophie Marshwill ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, ***Sophie Marsh*** will ensure that the Individual/Service User:

1. Clearly understands why the information is needed
2. Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
3. As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
4. Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
5. Has received sufficient information on why their data is needed and how it will be used

**5. Data Storage**

Information and records relating to service users will be stored securely and will only be accessible to authorised staff.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately (7 years).

It is Sophie Marsh’sresponsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

**6. Data access and accuracy**

All Individuals/Service Users have the right to access the information Sophie Marshholds about them. Sophie Marshwill also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition**,** Sophie Marsh will ensure that:

* There is a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection

* Everyone processing personal information understands that they are contractually responsible for following good data protection practice

* Everyone processing personal information is appropriately trained to do so

* Everyone processing personal information is appropriately supervised

* Anybody wanting to make enquiries about handling personal information knows what to do

* It deals promptly and courteously with any enquiries about handling personal information

* It describes clearly how it handles personal information

* It will regularly review and audit the ways it holds personal information

* It regularly assesses and evaluates its methods and performance in relation to handling personal information

* All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

**7. Google Analytics**

The controller has integrated the component Google Analytics (with anonymisation function) on this website.

Google Analytics is a web analytics service. Web analysis is the gathering, collection and analysis of data about the behavior of visitors to websites. Among other things, a web analysis service collects data on which website a data subject has come to a website from (so-called referrers), which subpages of the website were accessed or how often and for which period of time a subpage was viewed. A web analysis is mainly used to optimize a website and for the cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google might transfer the personal information collected via this technical procedure to third parties.

As IP anonymization is activated on our website, your IP address will be shortened by Google within Member States of the European Union or other states in agreement with the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by a Google server in the USA. On behalf of the operator of the website, Google will use this information to evaluate your use of the website, compile reports on website activity and to provide further services related to website and internet use to us. The IP address transferred through your browser to Google Analytics will not be combined with other data held by Google.

In addition, this website uses the Analytics feature UserID to track interaction data. This User ID will be additionally anonymized and encrypted and will not be linked with other data.

You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible.

In addition, you may prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics.

In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Further information and Google‘s applicable privacy regulations can be found at <https://policies.google.com/privacy?hl=en> and <https://marketingplatform.google.com/about/> The following link provides a further explanation of Google Analytics <https://marketingplatform.google.com/about/>.

Our website also uses Google Analytics performance reports relating to demographics and interests and reports on Google Display Network impressions. You can disable Google Analytics for display advertising and customize the ads on the Google Display Network by visiting the ad settings at this link: [https://adssettings.google.com](https://adssettings.google.com/).

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 GDPR (2018).

In case of any queries or questions in relation to this policy please contact the Data Protection Officer:

Signed: Sophie Marsh

Date: 19/11/2020

Review Date: 19/11/2021