



contact@soundtruism.com

DATA PROTECTION POLICY

Soundtruism Ltd complies with the [Data Protection Act 2018](#) and is registered with the Information Commissioner's Office Ref A8927607.

Personal data collection and storage follows 'data protection principles' and ensures information is:

1. used fairly, lawfully and transparently
2. used for specified, explicit purposes
3. used in a way that is adequate, relevant and limited to only what is necessary
4. accurate and, where necessary, kept up to date
5. kept for no longer than is necessary
6. handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

We ensure a stronger legal protection for more sensitive information, such as on the grounds of :

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

There are separate safeguards for personal data relating to criminal convictions and offences.

We agree to provide the right of individuals to be informed about how their data is being used, allow access to their personal data and ensure that incorrect data is updated with the right to have that data erased or to stop or restrict the processing of their data. Individuals have the right to data portability (allowing you to get and reuse your data for different services) and can object to how their data is processed in certain circumstances.

More info on our obligations and data protection measures please see : [Data protection and journalism: a guide for the media \(ico.org.uk\)](#)
[Guide to the UK General Data Protection Regulation \(UK GDPR\) | ICO](#)

Soundtruism needs to collect and use certain types of information about the Individuals or Service Users who come into contact with us in order to carry on our 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 Data Protection Act 1998.

Soundtruism's Data Controller and Editorial Lead determines for what purposes personal information is held, will be used for. They are also responsible for notifying the Information



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Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

Soundtruism may share data with other agencies such as the local authority, funding bodies and other voluntary agencies. The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows for the disclosure of data (including sensitive data) without the data subject's consent. These are when:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of a Individual/Service User or other person
- c) The Individual/Service User has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) 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.

Soundtruism regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

Soundtruism intends to ensure that personal information is treated lawfully and correctly. To this end, we will adhere to the Principles of Data Protection, as detailed in the [Data Protection Act 1998](#). Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) 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,
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act,
- g) 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,



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h) 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.

Soundtruism will, 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 that the rights of people about whom information is held, can be fully exercised under the Act.
- Set out clear procedures for responding to requests for information

Data collection is obtained with informed consent. This is when:

An Individual/Service User 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.

Soundtruism will 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, Soundtruism will ensure that the Individual/Service User

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

Data Storage. Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers. Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately. It is Soundtruism's responsibility 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.

Data access and accuracy. All Individuals/Service Users have the right to access the information Soundtruism holds about them. Soundtruism will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes. In addition, Soundtruism will ensure that:

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- It has 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 and deals promptly and courteously with any enquiries about handling personal information
- Describes clearly how it handles personal information
- Regularly review and audit the ways we hold, manage and use personal information
- 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.

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 Data Protection Act 1998. In case of any queries or questions in relation to this policy please contact contact@soundtruism.com