



Balogun Bassey CIC - Data Protection Policy & GDPR

1a. Policy Brief & Purpose

Balogun Bassey Community Interest Company (Balogun Bassey CIC) is committed to ensuring that all personal data we collect, process, and store is handled with the utmost care, confidentiality, and in accordance with relevant data protection laws. Our Data Protection Policy is designed to ensure that we treat all information related to employees, service users, volunteers, contractors, and other stakeholders fairly, transparently, and with respect for individual rights. This policy outlines how we collect, store, manage, and protect data and our responsibilities to the people whose data we hold.

1b. Legal Framework and GDPR Compliance

Balogun Bassey CIC is committed to full compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other applicable data protection legislation. This policy reflects our obligations under these laws to ensure the lawful, fair, and transparent processing of personal data.

We process personal data based on one or more lawful bases as defined in Article 6 and, where applicable, Article 9 of the UK GDPR, including:

- Consent
- Contractual necessity
- Legal obligation
- Vital interests
- Public task

- Legitimate interests (where applicable and not overridden by individual rights)

We also uphold the data protection principles set out in Article 5 of the UK GDPR and ensure that all processing activities respect the rights of data subjects.

2. Scope

This policy applies to all parties associated with Balogun Bassey CIC, including but not limited to:

- Employees, volunteers, and contractors.
- Service users, including children, families, and vulnerable adults.
- Job candidates and other individuals who provide personal information to the company.

It covers all data collected, stored, and processed by Balogun Bassey CIC, whether in digital or paper form, and regardless of how the data is received or shared.

3. Who is Covered Under the Data Protection Policy?

This policy applies to:

- All employees of Balogun Bassey CIC.
- Volunteers, contractors, and agency staff.
- Any external parties acting on behalf of the company who have access to personal data, including third-party service providers.
- All service users (children, families, and vulnerable adults) whose personal data is processed by Balogun Bassey CIC.

4. Data Protection Principles

We are committed to ensuring that all personal data is:

- **Accurate and kept up-to-date:** We will take reasonable steps to ensure that data is accurate and, if necessary, updated.
- **Collected fairly and for lawful purposes:** Data will only be collected for legitimate purposes, and we will be transparent with individuals about the reasons for data collection.

- **Processed in a lawful, fair, and transparent manner:** Personal data will be handled in accordance with relevant legal and ethical standards. ●
- **Protected from unauthorized access:** Appropriate security measures will be in place to protect personal data from unauthorised or unlawful access.
- **Not shared inappropriately:** Data will only be shared with third parties when necessary and with the explicit consent of the data subject, unless legally required otherwise.
- **Kept for no longer than necessary:** Data will be stored for only as long as is necessary for the purpose it was collected.

We will ensure that:

- We do not communicate personal data informally.
- We store personal data only for the duration specified, after which it will be securely destroyed.
- We do not transfer data to countries or organisations without adequate data protection provisions.

5. Data Subject Rights

Individuals whose data we process have the following rights:

- **Right to Access:** Individuals can request access to the personal data we hold about them.
- **Right to Rectification:** Individuals can request that we correct any inaccurate data we hold about them.
- **Right to Erasure:** Individuals can request the deletion of their personal data, subject to legal limitations.
- **Right to Restriction of Processing:** Individuals can request that we restrict the processing of their data in certain circumstances. ●
- **Right to Data Portability:** Individuals can request that we transfer their data to another organisation, where applicable.
- **Right to Object:** Individuals can object to the processing of their data, in some cases.

We are committed to ensuring that individuals are informed about:

- What data we collect about them.
- How we process their data.
- Who has access to their data.
- The steps we take to protect their data from loss, corruption, or misuse.

6. Storage of Paperwork

Balogun Bassey CIC collects and stores paper-based forms and documents, including feedback forms, registration forms, and other personal data. To ensure the security of this data:

- We will only ask for personal details that are necessary for the provision of services.
- Paperwork will be stored in locked filing cabinets, in secure offices.
- Any electronic versions of documents will be kept under password protection.
- We will destroy documents after three years, unless required to retain them for longer due to legal or regulatory requirements.

7. Data Protection Measures

We are committed to protecting personal data through a range of security measures, including:

- **Restricting access:** Sensitive data will be accessible only to authorised personnel.
- **Secure networks:** We will establish and maintain secure IT networks to protect personal data from cyberattacks.
- **Regular backups:** Regular data backups will be made to ensure data integrity.
- **Data encryption:** We will encrypt personal data when stored electronically or transferred across networks.
- **Document shredding:** Physical documents containing personal data will be securely destroyed through shredding.
- **Access authorisation:** Access to personal data will be restricted based on role and necessity.

8. Staff Training

All staff, including employees, contractors, and volunteers, will receive training on:

- Data protection and privacy laws.
- Best practices for handling personal data.
- Recognising and reporting potential data breaches.
- Online security and the protection of digital data.

9. Reporting Data Breaches

If a data breach occurs, it will be reported immediately to the designated Data Protection Officer (DPO) or senior management. The company will take steps to:

- Contain and assess the breach.
- Notify the affected individuals, where required.
- Report the breach to the Information Commissioner's Office (ICO), if necessary, within 72 hours.

10. Disciplinary Consequences

All employees, volunteers, and contractors must comply with this Data Protection Policy. Failure to adhere to the policy may result in disciplinary action, including termination of employment or contract. In cases of serious breaches, legal action may be taken.

11. Data Protection Impact Assessments (DPIAs)

Where necessary, we will conduct Data Protection Impact Assessments (DPIAs) to assess the impact of our data processing activities on the privacy of individuals. DPIAs will be carried out when:

- Initiating new projects that involve the processing of personal data.
- Using new technologies for data processing.
- Processing sensitive data in a way that may significantly affect individuals' privacy.

12. Data Sharing

We will not share personal data with third parties unless:

- We have received explicit consent from the individual.
- It is required to fulfil the contract or agreement.
- We are required to do so by law or regulatory authority.

13. Review and Monitoring

This Data Protection Policy will be reviewed annually, or sooner if necessary, to

ensure it remains in compliance with relevant data protection laws and regulations. The policy will also be updated in response to any significant changes in our data processing activities or the law.

14. Further Information

For further information about this policy, or to exercise your rights regarding your personal data, please contact:

- **Data Protection Officer:** Iman Balogun
- **Email:** info@balogunbassey.org

15. Policy Review and Approval

This policy has been approved by the Board of Directors and undergoes an annual review.

Last Review Date: March 1, 2025

Signed by:

A handwritten signature in black ink, appearing to be 'Samiat Balogun', with a stylized, flowing script.

Samiat Balogun
Director

A handwritten signature in black ink, appearing to be 'Amy Meite', with a stylized, flowing script.

Amy Meite
Director