

# Data Protection Policy

## Consortium of Voluntary Adoption Agencies UK Ltd

### Purpose and scope of this policy

The Consortium of Voluntary Adoption Agencies UK (CVAA) gathers and makes use of personal information about individuals related to the charity's work. This may include information about employees and trustees, as well as information about prospective adopters and children in the adoption process in England, as part of the Adoption Leadership Board (ALB) data collection, which is currently managed by CVAA.

This policy describes how CVAA collects, handles, and stores this personal data to comply with the relevant data protection law, namely the Data Protection Act 1998 and the General Data Protection Regulation (GDPR), which comes into effect in May 2018.

This policy applies to all members of staff, trustees, contractors, suppliers or other people working on behalf of CVAA.

### Data Protection Law

The Data Protection Act 1998 describes how organisations must collect, handle, and store personal information. These rules apply regardless of whether data is stored electronically, on paper or other materials.

To comply with the law, the data must be collected and used fairly, stored safely and not be disclosed unlawfully.

The Data Protection Act consists of 8 important principles. Personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

### Responsibilities of staff

Everybody working for or with CVAA has a responsibility to ensure data is collected, stored and handled appropriately and in line with this policy:

- The Board of Trustees is ultimately responsible for ensuring that CVAA meets its legal obligations.
- The CEO, assisted by the Business Support Officer, is responsible for:
  - Keeping the Board updated about data protection responsibilities, risks and issues
  - Reviewing the data protection procedures and related policies when necessary

- Checking and approving any contracts or agreements with third parties that may handle CVAA's sensitive data
- Ensuring that CVAA's systems, services and equipment used for storing data meet acceptable security standards
- All staff that handle and use data have a responsibility to keep data secure, by taking sensible precautions and following the guidelines below.

### Data storage and use

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly. These passwords are not to be shared between employees.
- If data is stored on removable media (USB memory stick, CD, DVD), these should be encrypted and/or protected by strong passwords. Removable media should be kept locked away securely when not in use.
- Data should only be stored on designated drives and servers and should only be uploaded to approved cloud computing services.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All computers containing data should be protected by appropriate security software.
- When working with personal data, employees should ensure the screen of their computers is locked when left unattended.
- Personal data must be encrypted before being transferred electronically, for instance using Egress Switch to send a secure email.

CVAA does not routinely store sensitive data in hard copy. However, any sensitive data stored on paper should be kept in locked storage facilities when not in use. Any data printouts should be shredded and disposed of securely when no longer required.

### Data accuracy

The Data Protection Act requires CVAA to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of all employees who work with the data to take reasonable steps to ensure it is kept as accurate and up to date as possible:

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- CVAA will make it easy for data subjects to update the information CVAA holds about them.
- Data should be updated as inaccuracies are discovered.

### Subject access requests

All individuals who are the subject of personal data held by CVAA are entitled to:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations.

This request from an individual is called a subject access request.

Subject access requests from individuals should be made in writing. Emails should be addressed to the Business Support Officer at [cvaamembershipservices@cvaa.org.uk](mailto:cvaamembershipservices@cvaa.org.uk). Letters should be addressed to:

CVAA,  
Southbank House,  
Black Prince Road  
London  
SE1 7SJ

The Business Support Officer will always verify the identity of anyone making a subject access request before handing over any information.

Subject access requests may be subject to an administrative charge.

### Other data requests

Organisations, partners, or individuals not directly involved in the running of CVAA who request data, such as adoption agencies or academic institutions, must provide information covering proof of identity, the use, handling, storage, and disposal of, the requested data. CVAA will approve all data requests on an individual basis.

### Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, CVAA will disclose the requested data. The CEO will ensure the request is legitimate seeking assistance from the Board and from CVAA's legal advisers where necessary.

### Providing information

CVAA aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, CVAA has a privacy statement, setting out how data relating to individuals is used by the company. This policy is available on request.

## The Information Commissioner's Office

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights. Their role is to uphold information rights in the public interest.

### England

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### Wales

Information Commissioner's Office  
2nd floor  
Churchill House  
Churchill way  
Cardiff  
CF10 2HH

### Scotland

Information Commissioner's Office  
45 Melville Street  
Edinburgh  
EH3 7HL

### Northern Ireland

Information Commissioner's Office  
3rd Floor  
14 Cromac Place  
Belfast  
BT7 2JB

### Telephone

0333 123 1113

### Email

[casework@ico.org.uk](mailto:casework@ico.org.uk)