

## **The Turning Data Protection Policy**

### **1. Introduction.**

The Turning Data Protection Policy sits below the Baranbas Fellowship of Churches (BFOC) Data Protection Policy. The Data Controller is as detailed in the BFOC Data Protection Policy and will inform the Information Commissioner of data held by the Turning and the purpose that this data will be used.

### **2. Compliance with the Principals of Data Protection**

- a. The data held in the Turning Application and by the Turning will be used fairly and lawfully and will only be disclosed to other agencies for the reasons outlined in the "Purpose Statement". In addition where the law allows BFOC will disclose data (Including sensitive data) without the data subject's consent, this data is outlined in the BFOC Data Protection Policy.
- b. The data held in the Turning Application and by the Turning in relation to Respondents will be used in accordance with the published "Purpose Statement", which may be amended from time to time. But will ensure the data is used fairly and Lawfully.

Data held on Users of the Turning Application will be for the purpose of use of the system in accordance with the published "Terms and Condition Statement" which all users must be made aware of and comply with, to protect respondents and themselves.

- c. The data held in the Turning Application and by The Turning will only be used by BFOC and users who have signed up to the "Terms and Conditions Statement", and will be considered as Sensitive data and primarily used to allow Respondents to be followed up by follow up users and for the compilation of statistics.
- d. Accuracy of information held by the Turning will be as given. Respondents and users of the application will be able to contact the Turning Administrator via a form on the Turning Website, or by Post if they are aware of any inaccuracies in the data held, and the Administrator will have in place processes to as far as reasonable practicable identify and update the Respondents or Users information and correct their personal information.
- e. Respondents Information will be held in an identifiable form for no longer than is necessary. Once the information has been closed either because the respondent has requested to no longer be contacted, they have connected with an agency or they have requested not to be contacted. The information will be anonymised two months after any of these events and only statistical information held.
- f. The data held on Respondents and Users will be used in accordance with the Purpose Statement and Terms and Conditions Statement applicable and will not be

shared with other agencies apart from those who have signed up to the Terms and Conditions and for no other purpose in the Purpose Statement.

- g. Data held will be held within the EEA. Access to the data will be restricted to users who have signed up to the Terms and Conditions. All users of the system will have complex password, which will be automatically updated. For Administrators this will be every 2 months, as they have access to a greater volume of data and for other users every 6 months. Administrators can remove access to data of users who are found to be in breach of the Terms and Conditions.
- h. All data will be held within the EEA. Users will be prohibited from accessing the data from outside the EEA and will sign on to this requirement in the Terms and Conditions.

### **3. Additional Definitions:**

- a. **Turning Application** – A web based application to allow the collection of Respondent information for the purpose of Follow Up.
- b. **Respondent** – A person who has met a member of the Turning and has freely given their personal information and is aware of the Purpose for which the information will be used, as detailed in the “Purpose Statement”
- c. **Purpose Statement** – A publically available document that may be amended from time to time and which details the purpose for which the Respondent’s may be used.
- d. **Terms and Conditions Statement** – A publically available document containing the terms and conditions of use that a “User” agrees to when signing up to use the application and enforcing compliance with the Purpose Statement and use of Respondent s personal information.
- e. All other definitions are as per the BFoC Data Protection Policy.

### **4. Record of Changes:**

- a. **20/02/17 - Draft 1 – First Draft for Comment.**
- b. **12/03/17 – Issue 1 First Issue**