

# MEDIA & MGMT

## Media & MGMT Data Protection Policy

The under-pinning principles of Media & MGMT responsibility in relation to the gathering, storage, usage and sharing of personal information is in line with the requirements of the Data Protection Act 2018.

### Introduction

In the course of a staff members work with Media & MGMT, they will come into contact with, or use, confidential information. The Data Protection Act 2018 (the Act) contains principles affecting their information and personal records. Information protected by the Act includes not only personal data held on computer, but also certain manual records containing personal data e.g. children or adults at risk's information files that form part of a structured filing system. The purpose of these rules is to ensure that no Flying Futures staff member breaches the Act.

If a staff member is in any doubt about what can or cannot be disclosed and to whom, then the default position is not to disclose any personal information until advice has been provided by Media & MGMT DPM/DCO.

Under the Act, all Media & MGMT staff members are personally accountable for their actions and can be held criminally liable if they knowingly, or recklessly, breach it. Any serious breach of data protection legislation will also be regarded as misconduct and will be dealt with under the Company's disciplinary procedures. Any access of a child or adults at risk's records - without authority - constitutes a gross misconduct offence and could lead to summary dismissal or termination of a volunteering agreement.

### The Data Protection Principles

There are 8 data protection principles that are central to the Act. Media & MGMT and all its staff members must comply with these principles at all times in its information-handling practices. In brief, the principles say that personal data must be:

1. Processed fairly and lawfully and must not be processed unless certain conditions are met in relation to personal data - and additional conditions are met in relation to sensitive personal data. The conditions are either that the individual has given consent to the processing, or the processing is necessary for the various purposes set out in the Act.
2. Obtained only for one or more specified and lawful purposes, and not processed in a manner incompatible with those purposes.
3. Adequate, relevant and not excessive.

Media & MGMT will only collect essential personal details of customers for whom it provides services or activities to. Essential customer information will include:

Media & MGMT Ltd. Company Number. 12747587 Registered Office in England and Wales:  
Canberra Farm, Moor Dike Road, Hatfield Woodhouse, Doncaster DN7 6DP  
Policy Updated 01/12/2022

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- The name, address and contact number of all children and adults at risk - and where appropriate their parent, families, carers, advocates or next of kin
- Any medical and health issues or particular requirements
- Contact with other professionals or agencies, if any.
- 4. Accurate and kept up-to-date.
- 5. Not kept for longer than is necessary.
- 6. Processed in accordance with the rights of customers at risk under the Act.

The uses that Media & MGMT anticipates that collected personal data will be used for can include such things as:

- To better manage, plan and improve the services and/or activities provided
- To help train and teach Media & MGMT staff members
- To help with research, but only with the customers agreement
- To market our products to customers, if explicit permission to do so has been granted by the customer
- To provide statistics about Media & MGMT services and activities delivered by the organisation - whilst ensuring that personal information will not be disclosed or used in this way and will never be shared with anyone, other than in the circumstances set out below.
- Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. All written records will be stored in a secure location and accessed by authorised personnel only. Electronic records held on computers will also be appropriately secured by way of password protection and restricted access.
- Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. Not transferred to a country or territory outside the European Economic Area unless that country ensures an adequate level of protection for the processing of personal data.

## **Media & MGMT staff member's obligations in relation to personal information**

Any staff member - who as part of their job duties and responsibilities - are required to collect personal information about children or adults at risk, must comply with this policy.

This includes ensuring the information is:

Processed in accordance with the Act

Only processed for the purposes for which it is held

Kept secure

Not kept for longer than necessary.

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## Data protection guidelines for Media & MGMT staff

Media & MGMT staff must comply with the following data protection guidelines at all times:

### Data Protection Guidelines

Never disclose confidential personal information to anyone except the data subject or to a person authorised by the data subject. In particular, unless the data subject has given their explicit prior written consent, personal information should not be:

- a) Given to someone from the same family.
- b) Passed to any other unauthorised third party.
- c) Placed on the Company's website.
- d) Posted on the Internet in any form.
- e) Be aware that those seeking information sometimes use deception in order to gain access to it.
- f) Always verify the identity of the data subject and the legitimacy of the request, particularly before releasing personal information by telephone
- h) Where Media & MGMT provides staff members with code words or passwords to be used before releasing personal information e.g. by telephone, always strictly follow the Company's requirements in this regard
- i) Only transmit personal information between locations by fax or e-mail if a secure network is in place e.g. a confidential fax machine or encryption is used for e-mail
- j) Forward all requests for personal information about a child or adult at risk to Media & MGMT named person responsible for data protection without delay
- l) Keep all personal data securely, either in a locked filing cabinet or, if computerised, by it being password protected so that it is protected from unintended destruction or change and is not seen by unauthorised persons
- m) Not access any child or adult at risk's records without authority as this will be treated as gross misconduct and it is a criminal offence
- n) Never write down (in electronic or hard copy form) opinions or facts concerning a data subject which it would be inappropriate to share with that data subject
- o) Never remove personal information from the workplace with the intention of processing it elsewhere, unless this is necessary to enable you to carry out your job duties and has been prior authorised by a Media & MGMT line manager
- p) Ensure that, when working on personal information as part of designated job duties when away from Media & MGMT workplace – (and only with the prior authorisation of a line manager) the terms of this policy and the Act continue to be observed at all times, particularly in matters of data security
- q) Ensure that hard copy personal information is disposed of securely e.g. by cross-shredding.
- r) Remember that compliance with the Act is each individual's personal responsibility. If staff

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members ever have any questions or concerns about the interpretation of these rules, they should immediately contact Media & MGMT named person responsible for data protection.

Media & MGMT will review this Data Protection Policy and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children and/or adults at risk; following a safeguarding incident within Media & MGMT (or one which directly concerns or affects Flying Futures); and/or following a significant organisational change.