



Data Protection Policy

The Data Protection Act 2018 requires that anyone processing personal data must comply with the eight enforceable principles of good practice. FIRST STEPS SURREY CHILD CONTACT CENTRE will comply with these requirements by ensuring that:

1. CCC has conducted an information audit to map data flows.
2. CCC has identified your lawful bases for processing and documented them.
3. CCC has reviewed how you ask for and record consent.

NB. The GDPR sets a high standard for consent but remember you don't always need consent. You should also assess whether another lawful bases is more appropriate. Consent to process children's personal data for online services is also required. If your business offers online services directly to children, you communicate privacy information in a way that a child will understand. You must provide children with the same fair processing information as you give adults. It will be good practice to also explain the risks involved in the processing and the safeguards you have put in place.

4. Registered with the Information Commissioners Office.
5. To fulfil the obligations to data subjects' right to be informed, everyone will receive a copy of the privacy notice. FIRST STEPS SURREY CHILD CONTACT CENTRE has a process to recognise and respond to individuals' requests to access their personal data.

Individuals have the right to obtain:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information – this largely corresponds to the information provided in the privacy notice.

FIRST STEPS SURREY CHILD CONTACT CENTRE also has:

- processes to ensure that the personal data you hold remains accurate and up to date,
- a process to securely dispose of personal data that is no longer required or where an individual has asked you to erase it
- procedures to respond to an individual's request to restrict the processing of their personal data.
- processes to allow individuals to move, copy or transfer their personal data from one IT environment to another in a safe and secure way, without hindrance to usability.
- procedures to handle an individual's objection to the processing of their personal data.
- processes to identify, report, manage and resolve any personal data breaches.

These are all included in the Privacy Policy.



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Date: 1st January 2022