



Data Protection Policy

1. Purpose

This policy provides a framework for ensuring that the Lighthouse Construction Industry Charity meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18). It applies to all the processing of personal data carried out by the Lighthouse Construction Industry Charity including processing carried out by associates, trusted partners, and processors.

The principles underpinning this data protection policy ensures:

- Complies with Data Protection legislation and follows good practice.
- Protects the rights of staff, clients, and partners.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach or cyber-attack on its systems.

2. Scope

This policy sets out our approach to our compliance with data protection legislation guided by data protection principles. It applies to all aspects of employment with us, in each department, and includes recruitment, pay, appraisals, promotion, conduct at work, disciplinary and grievance procedures, both throughout employment and after employment conclusion.

In addition to the above, this policy also covers all client's data and information, who have accessed the charity and any services administered thereafter.

- All data should be processed fairly, lawfully and in a transparent manner.
- Any data should only be used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
- All data collection should be adequate, relevant, and limited to what is necessary.
- All data should be accurate and, where necessary, up to date.
- No data should be held for longer than necessary.
- All data shall be kept safe and secure.

There is stronger legal protection for more sensitive information, such as:

- Race

- Ethnic background
- Political opinions
- Religious beliefs
- Trade union membership
- Genetics
- Biometrics (where used for identification)
- Health
- Sexual orientation

Special categories of personal data (sensitive data)

Personal data deemed to be more sensitive by law, needs additional protection. They cannot be processed unless at least one further condition for processing special category data is fulfilled. These conditions are:

- The data subject has given explicit consent.
- The processing is necessary in the context of employment law, or laws relating to social security and social protection.
- The processing is necessary to protect vital interests of the data subject or of another natural person.
- The processing is carried out during the legitimate activities of a charity or not-for-profit body, with respect to its own members, former members, or persons with whom it has regular contact in connection with its purposes.
- The processing relates to personal data which have been manifestly made public by the data subject.
- The processing is necessary for the establishment, exercise, or defence of legal claims, or for courts acting in their judicial capacity.

Data Protection for Clients

Under the Data Protection Act 2018, clients have the right to find out what information organisations store about them. These include the right to:

- Be informed about how the data is being used.
- Access personal data.
- Have incorrect data updated.
- Have data erased.
- Stop or restrict the processing of their data.
- Data portability.
- Object to how clients' data is processed in certain circumstances.

Lighthouse Construction Industry Charity Policy: Clients Rights

- The Lighthouse Construction Industry Charity will keep all client data on an encrypted data management system.
- The Lighthouse Construction Industry Charity will only keep and use the data necessary to complete a holistic review and provide the best interventions to support the client.
- If the client wishes to exercise their 'Right to be forgotten', identifying data will be removed leaving anonymous reporting data on the case management system.

Anonymous reporting data includes but not limited to region; date of birth; gender; job role; amount supported by and reason for support.

- No marketing will be generated from the case management system. Marketing materials will only be sent to customers who specifically request them.
- No automated decisions will be made using the data provided.

3. Policy Statement

The Lighthouse Construction Industry Charity is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about clients, staff, associates, trusted third parties or those who work or interact with us.

The objective of this policy is to work within the following parameters:

- Meeting our legal obligations as laid down by the GDPR.
- Ensuring that data is collected and used fairly, lawfully, and transparently.
- Processing personal data where an appropriate legal basis to do so exists and only to meet our operational needs or fulfil legal requirements.
- Taking steps to ensure that personal data is up to date and accurate.
- Managing appropriate retention periods for personal data.
- Ensuring that data subjects' rights are appropriately exercised.
- Ensuring that a nominated officer is responsible for data protection compliance.
- Ensuring that all staff are made aware of good practice in data protection.
- Providing adequate training for all staff responsible for personal data.
- Ensuring that everyone handling personal data knows where to find further guidance.
- Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly.
- Sharing information where required by law and where approved information sharing agreements are in place and when agreed processes have been followed.
- Regularly reviewing data protection procedures and guidelines within the organisation.
- Publishing and promoting this policy and the rights of data subjects including how to make a right of access request.
- Establishing procedures for reporting data protection breaches to relevant authorities for investigation, including self-referral mechanisms.
- Being clear with individuals whose data we process as to how we store it, what we do with it and why.
- Responding to any valid subject access requests promptly and in any event within one month of receiving them.

4. Lighthouse Club Best Practise Requirements

Lighthouse Construction Industry Charity will ensure all employees will undertake data protection training while onboarding and additionally will complete an annual review of this information as a minimum.

Employees must:

- Observe all forms of guidance, codes of practice and procedures around data collection, sharing, handling and use of personal information.
- Have a firm understanding of the purpose of data protection and personal information.
- Collect and process information in accordance with the purpose for which it is required to be used by Lighthouse Construction Industry Charity, to meet its statutory requirements and business needs.
- Ensure the information is destroyed when no longer required in line with our information management guidance.
- Upon receipt of a request by or on behalf of an individual for information held about them (Subject Access Request), staff will refer requests to the Line Manager as quickly as possible so that the request can be acted on quickly.
- Understand that breaches of this policy may result in a detrimental impact to the charity and reputational risk.

5. Compliance with this Policy

Any employee found to have violated this policy will be subject to disciplinary action, up to and including dismissal.