

FIRST GDPR COMPLIANCE STATEMENT

Introduction

The EU General Data Protection Regulation (GDPR) came into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

FIRST ('we' or 'us' or 'our') is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

FIRST is dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

Preparing for GDPR

All data is protected. Where we rely on consent for processing, this is explicit and is verified by a signature. FIRST have designated April Adam, Service Manager as our Data Protection Officer and have prompted awareness of GDPR across the service, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

- **Information Audit** – a service-wide information audit was carried out to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed. This is done on a regular basis to ensure we continue to meet GDPR regulations.
- **Policies & Procedures** – data protection policies and procedures were reviewed and revised to meet the requirements and standards of GDPR including IT security, data retention and erasure, data breaches and third-party transfers and disclosures.

FIRST understands that continuous employee awareness and understanding is vital to the continued compliance of GDPR and have involved our employees in our preparation plans and induction of revised policies and procedures. Staff will also be provided with annual updates and any relevant training.

Data Breaches

Our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach.

Data Transfer Statement

We have revised our Consent mechanisms for obtaining personal data, ensuring that individuals understand what and why they are providing it. FIRST will at times use personal data to demonstrate the impact, trends, etc of our service. Any data will be on an anonymous basis unless we have explicit consent from individuals. FIRST will share personal data with law enforcement or other authorities if required by applicable law including and in line with our Safeguarding and Promoting the Welfare of Children/Safeguarding Adults at risk policies, where there are concerns about the wellbeing of a child or adult at risk and is considered necessary for their welfare and protection.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information on an individual's right to access any personal information that FIRST processes about them and to request information about:

- What personal data we hold about them.
- The purposes of the processing.
- The categories of personal data concerned.
- The recipients to whom the personal data has/will be disclosed.
- How long we intend to store your personal data for.
- If we did not collect data directly from them, information about the source.
- The right to have incomplete/inaccurate data corrected/completed and the process for requesting this.
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making we use.
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances.

Subject Access Request/Right to be Forgotten

We have revised our Subject Access Request procedure to accommodate the thirty-day timeframe for providing the requested information and making this provision free of charge. Relevant templates are available to ensure that communications with data subjects in relation to a Subject Access Request or Right to be Forgotten are compliant and adequate. If you wish either of these to be undertaken, please contact Mrs April Adam, Service Manager for the relevant template.

If you have any questions about our preparation for GDPR, please contact our Data Protection Officer, April Adam at:

Email april.adam@firstforfife.co.uk
Telephone 01592 585960
Postal address 3 South Fergus Place, Kirkcaldy, Fife, KY1 1YA