

## Annual Data Protection Audit Sheet (Appendix E to the Data Protection Policy)

| Members of group who hold data to be checked against this audit |  |                      |
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| Name  | Role   | Completed (Initials) |
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| <b>1.</b>   | <b>Data stored on Computers</b>  | <b>Checked</b>       |
| a)  | All files holding personal data are password protected. This includes computer and all removable media.  |                      |
| b)  | No personal data is displayed on computer screens where unauthorised persons could view the information.   |                      |
| c)  | Laptops, memory sticks, CDs or other portable hardware (including those owned personally) that may contain Read Easy data are not left unattended in public places or in motor vehicles, even if locked in the boot.   |                      |
| d)  | All personal data is removed from hardware that is no longer used before disposal.   |                      |
| <b>2.</b>   | <b>Data held manually</b>  |                      |
| a)  | All manual files are kept under lock and key with no material left out on desks or tables.   |                      |
| b)  | All disposal of paper-based personal files is done by shredding.   |                      |
| <b>3.</b>   | <b>General use, storage and deletion of data</b>   |                      |
| a)  | The data held is only that required specifically for the administration or support of the local Read Easy group.   |                      |
| b)  | The Data Subject has given <b>consent</b> to the processing of their data (e.g. for the purposes of sending newsletters or applying for funds), the processing is necessary for the <b>legitimate interest</b> and activities of the group (e.g. use of data for appointing volunteers, running training, enrolling Readers, monitoring progress of reading pairs, etc.) or the processing is necessary to comply with Read Easy's <b>legal obligations</b> In addition, Personal Data is not being used for a purpose other than the specific purposes for which it was collected, unless consent has been given. |                      |
| c)  | The Volunteer Equalities Forms and Reader Equalities Forms are never marked to indicate identity and are always filed separately and anonymously. In addition, any data drawn from these forms and recorded elsewhere is always done so in a way that does not reveal identity.  |                      |



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| d)        | The Coordinator only shares page 2 of the Reader Enrolment Form with the Reading Coach, plus any other specific information that the Reader has given signed permission for.  |  |
| e)        | Results from any Enhanced DBS Checks that are carried out on volunteers are destroyed immediately, after marking the volunteer folder either with: 'suitable' or 'unsuitable for coaching a Reader assessed to be at risk'. (Details of the specific convictions should not be recorded.)<br><b>Please see the DBS Check Policy for further details.</b>  |  |
| f)        | All unnecessary Personal Data is destroyed or erased when it is no longer required, including that of referees on receipt of references, apart from as indicated at g) below.   |  |
| g)        | Data on Readers and Volunteers is retained for <b>three to four</b> years after completion of their course for (insurance purposes, please see Clause 9 in the Data Protection Policy for further details) and then deleted or destroyed securely, unless the Reader has given signed permission for it to be retained for longer in order to be used for a longitudinal evaluation study, or the volunteer has provided a written request to be kept on Read Easy's files for future volunteering opportunities. |  |
|           | Financial data is kept for 7-8 years since the last transaction (for legal reasons).  |  |
| h)        | All databases are accurate and updated or corrected at the request of Data Subjects.  |  |
| <b>3.</b> | <b>Sharing of personal data</b>   |  |
| a)        | Any personal data that is released to an outside party is only shared in strict adherence to the Data Protection Policy, the privacy notice given to the data subject, with the written permission of the Data Protection Champion and, where required, the data subject.   |  |
| b)        | Any personal data that is shared within the Read Easy Management Team is done so on a strictly 'need to know' basis, is anonymised wherever possible and with clear guidelines about confidentiality.   |  |
| c)        | <b>All</b> volunteers (Management Team members, Coordinator and Reading Coaches) use 'bcc' when emailing other members of the group, or other people, unless specific permission has been given to do otherwise.  |  |
| d)        | No personal contact details are passed to a third person without prior consent of the individual whose personal details are requested.  |  |
| e)        | Any lists of attendees at events only contain name, job title and company name (if relevant) with no postal addresses, email addresses or telephone/mobile numbers.   |  |
| f)        | All requests by individuals for access to their data held by the group is only granted following a written request to the Data Protection Champion and the identity of the data subject is verified.  |  |
| <b>4.</b> | <b>Responsibilities of all volunteers</b>   |  |
| a)        | All volunteers are provided with information about 'Keeping Data Secure' (Appendix D) and are reminded annually of the importance of abiding by this guidance. (The information from this Appendix is included in the Reading Coach Handbook, Management Team Handbook and Coordinator Handbook.)   |  |



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| <b>b)</b>                    | All volunteers and Readers are responsible for providing updated information for the records held about them.  |                |
| <b>c)</b>                    | All volunteers standing down from Read Easy are asked to confirm that all Personal Data held by them as part of their role has been passed on to the Team Leader or disposed of securely (as per 1 and 2 above).   |                |
| <b>5.</b>                    | <b>Data Protection Notices</b>   |                |
| <b>a)</b>                    | All potential volunteers are provided with the 'Data Protection Notice for Potential Volunteers' on their application forms.   |                |
| <b>b)</b>                    | All volunteers who are appointed to a role within Read Easy are given a copy of the Data Protection Notice for Volunteers (Appendix A) on appointment and are made aware of how they can access the Data Protection Policy and contact the Data Protection Champion. |                |
| <b>c)</b>                    | The Data Protection Notice (on the Reader Enrolment Form) is read to Readers as part of the enrolment process and they are told about the Data Protection Policy and role of the Data Protection Champion at the same time.  |                |
| <b>d)</b>                    | The Data Protection Notice for Donors (Appendix C) is sent to all donors.  |                |
| <b>6</b>                     | <b>Registration (notification) with the ICO</b>  |                |
|                              | Data Controller has registered with the ICO and the annual fee has been paid, if the group has decided to register.  |                |
| <b>Audit carried out by:</b> |  | <b>Signed:</b> |
|                              |  | <b>Date:</b>   |