Data Protection Policy

General Policy Statement

Start Confident First Aid recognises the legal requirements of the General Data Protection Regulation (GDPR) and is committed to safeguarding personal data.

Specifically:

- Personal data will be processed fairly, lawfully, and transparently.
- Processing will only occur if:

  a) at least one of the conditions set out below is met;

  b) in the case of special category data
- Personal data will be collected for specified, explicit and legitimate purposes and not further processed in ways incompatible with those purposes.
- Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Personal data shall be accurate and kept up to date where necessary.
- Personal data will be retained in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
- Personal data will be processed in a manner that ensures appropriate security.
- **Start Confident First Aid** will remain responsible and accountable for all personal data collected.

Conditions For Processing Personal Data

A relevant exemption refers to legally defined instances where processing is allowed without individual consent, such as legal obligations or matters of public interest. Unless a relevant exemption applies, at least one of the following conditions must be met when processing personal data:

1. **Consent** - The individual has consented to the processing of their data.
2. **Contractual Necessity** - The processing is necessary for a contract with the individual or because the individual has asked for something to be done so they can enter into a contract.
3. **Legal Obligation** – The processing is necessary due to a legal obligation (other than obligations arising from a contract).

4. **Vital Interests** – The processing is necessary to protect the individual's vital interests, such as in a life-or-death situation where an individual's medical history is disclosed to an A&E department treating them.

5. **Public Functions** – The processing is necessary for administering justice or exercising statutory, governmental, or other public functions.

6. **Legitimate Interests** – The processing aligns with the "legitimate interests" condition.

Conditions For Processing Special Category Data

At least one of the additional conditions listed below must also be met whenever we process special category data:

1. **Explicit Consent** – The individual has explicitly consented to the processing of their special category data.

2. **Employment Law Compliance** – The processing is necessary to comply with employment law.

3. **Vital Interests** – The processing is necessary to protect the vital interests of the individual (when consent cannot be given or reasonably obtained) or another person (if consent has been unreasonably withheld).

4. **Not-for-Profit Organisations** – The processing is carried out by a not-for-profit organization and does not involve disclosure of personal data to a third party unless the individual consents. Additional limitations apply to this condition.

5. **Public Information** – The individual has deliberately made the information public.

6. **Legal Proceedings** – The processing is necessary for legal proceedings, obtaining legal advice, or otherwise establishing, exercising, or defending legal rights.

7. **Public Functions and Medical Purposes** – The processing is necessary for administering justice, exercising statutory or governmental functions, or for medical purposes conducted by a health professional or someone with an equivalent duty of confidentiality.

8. **Equality Monitoring** – The processing is necessary for monitoring equality of opportunity and is carried out with appropriate safeguards for the rights of individuals.

In addition to these conditions outlined in GDPR, additional regulations allow for processing special category data for other purposes, typically those in the substantial public interest where individual consent may not be feasible. Examples include preventing or detecting crime or protecting the public against malpractice or maladministration.

Our policies are kept under constant review and updated as required – October 2024