



# GDPR Statement

Westway Trust already adheres strictly to the Data Protection Act (DPA). We are now working towards full adherence to the new General Data Protection Regulation (GDPR) which comes into force on 25 May 2018.

The GDPR will replace the current DPA governing the processing of personal data. The Trust is working hard to ensure that it is fully prepared for these changes when they come into effect and will be documenting the progress along the way through our GDPR statement.

A lot of the concepts and principles will remain the same as those stated in the Data Protection Act, but with more emphasis on accountability and how businesses are demonstrating compliance. GDPR still applies to 'personal data' but there is a lot more detail included. The details make it clear that personal data can be something that indicates location such as an IP address.

The GDPR applies to both electronic systems storing and holding personal data and to manual filing systems where personal data is accessible. This is wider than the scope of the Data Protection Act and includes chronologically ordered sets of manual records containing personal data.

The GDPR refers to sensitive personal data as "special categories" of personal data. These special categories mirror those included in the DPA with some minor changes: they specifically include data used to identify an individual such as genetic and biometric data.

Unlike the DPA, the GDPR applies to both controllers and processors of data. The definitions mostly remain the same with the controller saying how and why data is used and the processor acting on behalf of the controller.

At times Westway Trust acts as both the controller and the processor. Where we are the controller we will document who is the processor and where we are the processor we will document who is the controller.

Our software is risk managed through the use of strong passwords that are changed periodically, permission groups and document control such as password and access protecting.

All of our employees are required to complete online data protection training designed to promote acceptable use. This is reviewed annually or when any changes to legislation are made.

Emmanuel Asamoah (Head of Finance) and Martin Parker (Head of Policy) have been designated to take responsibility for the management of compliance and security breaches respectively.

In order to achieve full compliance, we have

1. Set up a steering group and engaged a specialist consultant under the direction of the Trust's Joint CEOs to oversee our compliance

2. Commenced a programme of data audits to ensure we fully adhere to the new regulations,
3. Started to document fully how and why personal and sensitive data is used in the company
4. Undertaken a review of policies and procedures and are in the process of amending these to ensure they are compliant
5. Reviewed colleague training and are in the process of amending this and rolling out to relevant colleagues
6. Reviewed software requirements and are working with those suppliers where amendments are necessary to ensure compliance