



Kickstart Trust (Bishop's Stortford) Ltd.

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Kickstart Operating Procedure

The purpose of this Procedure is to ensure that Kickstart members work in accordance with the provisions of the General Data Protection Regulation (GDPR) as per the Kickstart General Data Protection Regulation Protocol.

Data Security:

All Kickstart members are responsible for keeping clients personal data secure and for reporting, immediately, any suspected case of a personal data breach, to the Data Protection Officer (Roger Foot) or a Director (Peter Scarlett or David Pick).

Please Note: The definition of a data breach covers a wide spectrum of incidents under GDPR, for example:

Accidental erasure of personal data, even though it may be backed up and recovered.

Leaving personal data open for others to see.

Changes to personal data without permission.

Access by an unauthorised third party.

Computing devices storing personal data being lost or stolen.

Receptionists Responsibilities:

- Welcome all clients and ask them to sign in for fire safety. Also to sign out when they leave.
- Clients for Clarion shall be directed to the Clarion adviser and shall not be registered on the Kickstart system.
- If a Clarion Client subsequently seeks Kickstart assistance they shall be registered, re-registered or logged in as a Kickstart client.

New Client

- Make clients aware of their rights under GDPR. A record will be maintained both electronically and on the clients Registration Form
- Register new client
- Print Registration Form
- Allocate client to an adviser, with registration form.
- Transfer client's data to advisers computers.

Existing Client - Returning first time under GDPR or over six months since last visit

- Make client aware of their rights under GDPR
- Re-register client
- Print new Registration Form
- Allocate client to an adviser, with client's registration form.
- Transfer client's data to advisers computers.

Existing Client - Returning subsequent times under GDPR

- Log Client's visit or amend personal data if client's situation has changed.
- Allocate client to an adviser, with client's registration form.
- Transfer client's data and CV, when there is one, to advisers computers.

General:

- Shred client's paper files if client has not returned for six months.
- Remind Clients to sign out when leaving Kickstart Centre.
- Maintain a tidy working environment.

Advisers Responsibilities:

- Ensure client's personal data is up to date and refer client back to receptionist to correct personal data, as appropriate.
- Assess client's needs - recognising that they may require more assistance than the client requested at registration.
- Action client's needs, as required, each of which may lead on to additional needs:
- CV: New and amended:
 - Inform the client that we will hold the CV on file for six months after which it will be deleted. Give client print outs of the CV and ask client to keep at least one copy for future reference and to bring it back with her/him when (s)he returns.
 - Save CV to 'Documents', naming it according to the following convention
CV(space)(hyphen)(space)firstName lastName (e.g. CV - John Smith).
 - Email CV to admin@stortfordkickstart.org.uk for Administrator to update the CV folder.
 - Email CV to client and assist client, when required, to create a new mail box in her/his email account and to drag CV email to the new mail box, from where it may be saved for future use.
 - Delete CV from adviser's computer after the emails have been sent and actions completed.

- CV: Current
 - The above name convention shall also be used when saving a current CV to 'Documents' for uploading to job search web sites etc. Delete CV when action completed.
 - Note: No CV's shall be left on advisers computers at the end of the morning session.
- Setting up emails: ensure client knows how the email system operates and advise client that (s)he is responsible for remembering the address and password. Also the importance of logging off before exiting the website.
- Setting up job site accounts, including "Find a job": Remind client that (s)he is responsible for remembering the User ID and passwords and that (s)he is responsible for ensuring that their personal data and CV is kept up to date on these sites.
- Job search: assist client as required.
- Job Application: assist client as necessary.
- Interview Role play: Assist as appropriate to the job being applied for.
- When the client requests, assist client to update personal data and CV on job search websites, including "Find a job", on which client is registered.
- Record actions on the Registration sheet, including any Job Websites on which client has registered. No personal details, or subjective comments, to be added to the registration sheet, which must be returned to the black folder on the receptionist's desk when actions completed..
- Ensure client has logged out correctly from email and job site accounts.

General -

- Remember the Kickstart passwords, Do not ask other advisers for the password where they could be overheard. **This could result in a data breach.** A list of our passwords is held in the Web File in the steel cabinet
- Remind client to sign out before leaving Kickstart centre.
- Maintain a tidy working environment: Do not leave any paperwork holding clients personal data unattended, where it could be viewed by other clients, or CVs open on the computers when not working on them. **This could result in a data breach**

Administrator's Responsibilities

- To update the CV data folder and back-up memory sticks
- To provide the Statistician with anonymised data for statistical analysis.
- To provide supporting information in respect of any reasonable request, from a client, to the Data Protection Officer, asserting the client's individual rights.

Systems Engineer responsibilities:

- To maintain the Kickstart Operating System.
- To maintain the Kickstart Operating System back up files.

Data Protection Officer Responsibilities:

- To inform and advise members about the obligations to comply with GDPR Data Protection laws.
- To monitor compliance with GDPR
- To be the first point of contact with the ICO
- To periodically review the GDPR Protocol and Operating procedures which shall be confirmed at each AGM
- To receive any written request from a client asserting her/his rights. To determine action to be taken and to respond to the client appropriately. To keep a log to show the request is actioned within 28 days.
- To inform the directors immediately of a suspected data breach for action as per section 11 of the GDPR Protocol.
- To maintain a record of suspected data breaches and actions taken.

Directors Responsibilities:

- To call an emergency meeting of Trustees (Quorum is 3) to consider the implications as per section 11 of the GDPR Protocol. If the breach is serious enough to be notifiable to the ICO, it shall be done within 72 hours of the breach being discovered
- Note: ICO suggest that all data breaches be reported.
- ICO telephone number: 0303 123 1113

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