



Data Protection Policy

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Policy Owner	Communications and Administration Officer
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Introduction

MySelf-Management (MSM) is a charity established to promote and support the vision of self-management of health for those living with long-term conditions. To deliver this service and our operational functions, we must process personal data whilst complying with data protection law. We are committed to protecting the rights and privacy of our staff and individuals who use our service.

Data protection law provides individuals with rights in relation to their personal data and requires organisations to be transparent and accountable for the use of personal data. This means that MSM and its employees must protect and manage personal data in relation to the legal rights of the data subject; the individual to whom the personal data relates.

The Communications and Administration Officer for MSM is our first point of contact for data protection related questions, and can be contacted via email at:

info@myself-management.org or by phone on 07834 753766.

Overall responsibility for compliance relating to data protection lies with our Manager, who can be contacted via email at: manager@myself-management.org or by phone on 07462 171369.

Purpose and Scope

This policy provides a framework for ensuring that MSM meets its obligations under the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 (DPA 18) and the Data (Use and Access) Act 2025 (DUAA)(amendments introduced). It applies to all the processing of personal data carried out by MSM including processing carried out by contractors and processors.

MSM complies with data protection legislation guided by the six data protection principles.

In summary, they require that personal data is:

- processed fairly, lawfully and in a transparent manner.
- used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
- adequate, relevant, and limited to what is necessary.
- accurate and, where necessary, up to date.
- not kept for longer than necessary; and
- kept safe and secure.



In addition, the accountability principle requires us to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data.

Failure to do so can result in breach of legislation, reputational damage, or financial implications due to the risk of fines. To meet our obligations, we have put in place appropriate and effective measures to make sure we comply with data protection law.

Our staff have access to the following policies, operational procedures and guidance to give them appropriate direction on the application of the data protection legislation:

Data Breach Procedure
Data Subjects Rights Procedure
Data Sharing Procedure
DPIA Procedure and Form
Data Protection Complaints Procedure
Records Management Policy
Information Security Policy

Information covered by Data Protection Legislation

The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person.

Special Category Data

Some personal data is more sensitive and is afforded more protection, this is information related to:

- Race or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric ID data;
- Health data;
- Sexual life and/or sexual orientation; and

- Criminal data (convictions and offences)

Special Category Data: Lawful bases

Special category and/or 'protected characteristics' staff and member data will be processed by MSM for several reasons related to, and not incompatible with, the specified purpose for which it was originally collected (as outlined in the MSM Privacy Notices).



Staff

MSM processes various types of special category data for employees, including:

- Sickness absence data
- Occupational health data
- Health and safety data
- Disciplinary and grievance procedure data
- Equality and diversity data

Article 6 and 9 lawful bases for all data held by MSM are available to staff on the internal file store in the Records of Processing Activities.

Exceptional circumstances

There may be exceptional circumstances where MSM may have to share special category or 'protected characteristics' data using a different lawful basis, including but not limited to:

An emergency

For example, where a member or member of staff is in a life-or-death situation, MSM may have to share special category data to a paramedic, or other health worker:

- UK GDPR Article 6(1)(d) – vital interests
- UK GDPR Article 9(2)(c) – vital interests

Legal claims

For example, where MSM is approached and asked to provide data on staff or members necessary to establish, exercise or defend a legal claim or as evidence for court:

- UK GDPR Article 6(1)(c) – legal obligation
- UK GDPR Article 9(2)(f) – legal claims

Our Commitment

MSM is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about members, volunteers, staff or those who work or interact with us.

- Privacy Notices - we publish a privacy notice on our website and provide timely notices where this is required. We track and make available any changes in our privacy notice. We also publish a staff privacy notice and keep it up to date
- Training - we require all staff to undertake mandatory training on information governance



and security which they are required to refresh every year. In addition, all staff are required to attend a more detailed data protection training module as part of their induction.

- Breaches - we consider and review all personal data breach incidents and have a reporting mechanism that is communicated to all staff. We assess whether we need to report breaches to the regulator, the Information Commissioner's Office (ICO). We take appropriate action to make data subjects aware if needed.
- Information Rights – the DPO and the Communications and Administration Officer oversee the processes to handle subject access requests and other information rights requests.
- Data Protection by Design and Default - we have a procedure to assess processing of personal data perceived to be high risk, which need a Data Protection Impact Assessment (DPIA) to be carried out, and processes to assist staff in ensuring compliance and privacy by design is integral to any product, project or service we offer.
- Records of Processing Activities (ROPAs) - we record our processing activities and processing of special category data.
- Policies and Procedures - we produce policies and guidance on information management and compliance that we communicate to staff.
- Communications – MSM seek to embed a culture of privacy and risk orientation.



Complaints

If you wish to complain about any aspect of MSM's handling of your personal data, you can do so by contacting info@myself-management.org giving the reasons for your complaint, and detailing the background, timescales, people involved etc. The complaint will be investigated, and the outcomes will be shared with you. Actions taken to address the issue will also be shared, if your complaint is upheld.

If you are still unsatisfied when this process is complete, you can make a complaint to the Information Commissioner by visiting <https://ico.org.uk/>

Roles and Responsibilities

We have a data protection risk management document that ensures the risk to personal data across MSM is identified and appropriately managed. This document is informed by progress noted in the MSM Accountability Tracker, which details progress across a range of data protection compliance issues.

Compliance Lead

The Manager for MSM, who is responsible for overall compliance relating to data protection, can be contacted via email at manager@myself-management.org or by phone on 07462 171369

Data Protection Officer (DPO)

The MSM Data Protection Officer (DPO) is primarily responsible for advising on and assessing our compliance with the DPA and UK GDPR and making recommendations to improve compliance. The MSM DPO can be contacted via info@myself-management.org

Monitoring

Compliance with this policy will be monitored via the Compliance Lead and the DPO, reporting to the MSM Trustees

Definitions

MSM uses the definitions provided by the Information Commissioner's Office (ICO), which are available here: [Key data protection terms you need to know | ICO](#)