Data Protection Policy

SWINDON CITY OF SANCTUARY (SCOS)

Last updated	Nov 2019

Definitions

Charity	Swindon City of Sanctuary (SCOS), a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	Nicola Wood – Executive Officer
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

a. processed lawfully, fairly and in a transparent manner in relation to individuals;

b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public

interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

a. This policy applies to all personal data processed by the Charity.

b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.

c. This policy shall be reviewed at least annually.

d. The Charity does not need to register with the Information Commissioner's Office (ICO) as the charity was established for not-for-profit making purposes and does not make a profit. In guidance with the ICO we will:

• only process information necessary to establish or maintain membership or support

• only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;

• Will only hold information about individuals whose data we need to process for this exempt purpose

• the personal data we process is restricted to personal information that is necessary for this exempt purpose

3. Lawful, fair and transparent processing

a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems (see appendix A).

b. The Register of Systems shall be reviewed at least annually.

c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests

b. The Charity shall note the appropriate lawful basis in the Register of Systems.

c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent

shall be kept with the personal data.

d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

5. Data minimisation

a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

b. The main systems used by the charity and are securely protected are:

- Insightly database to hold relevant personal data

- Office 365 in which data personal data is securely held to enable us to meet the needs of those we support on our projects.

- Google Forms and sheets to enable us to gather relevant information for our projects and to enable us to provide relevant support.

6. Accuracy

a. The Charity shall take reasonable steps to ensure personal data is accurate.

b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.

b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

 c. When personal data is deleted this should be done safely such that the data is irrecoverable.

 d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO

Appendix A

Swindon City of Sanctuary GENERAL DATA PROTECTION REGULATION: REGISTER OF SYSTEMS
Introduction

In accordance with the General Data Protection Regulation which came into force on 25 May 2018, this document sets out the approach of Swindon City of Sanctuary to the collection, use and management of the personal data of its supporters, volunteers, and those we support under the following headings:

- The data we collect and in what way
- How the data are stored and who has access to them
- Sharing the data
- Purpose for which the data are used
- Data removal and archiving
-

The data we collect and in what way

When signing up to our newsletter, becoming a volunteer or using our services for support or as a referral agency individuals are asked to complete one of our application forms (all thorugh Google forms which is password protected) and to supply name and email address, and in some cases residential address and telephone number too.

The data is entered on to our secure CRM system (Database) by a member of staff and updated as new data are made available throughout the year (e.g. change of email or residential address).

Names and email addresses are also entered by staff onto a Mailchimp contact database in order to facilitate the dispatch/receipt of an online newsletter.

Data for those supported by and volunteering on our Hosting Scheme 'Rooms for All' is stored on Office 365 in a secure file.

How the data are stored and who has access to them

Only the staff of Swindon City of Sanctuary – i.e. Executive Officer and Hosting Coordinator have access to the personal data of supporters, volunteers and those we support at Swindon City of Sanctuary.

All our systems used are password-protected.

Our Support Worker Volunteers has access to our live hosting logs with guests and Hosts details on Dropbox but only for those they are supporting.

Our Lead Volunteers for We're Open and our Schools work also have access to some relevant files on Dropbox and information on individuals only where necessary.

Online application forms are stored electronically and password protected.

Sharing the data

The complete data set is shared solely between the employees and volunteers as described above.

The complete data set will not be shared with any third party unless legally obliged to do so or where explicit permission has been given by an individual such as when working with agencies to support an individual in our hosting scheme 'Room for All'.

From time to time it might be necessary to share the personal data of one person of Swindon City of Sanctuary with another`r in order, for example, to arrange transport to an event etc. This will not, however, be done, without the agreement of the person concerned.

Purpose for which the data are used

The data are processed on the basis of legitimate interest.

The data are used primarily as a vehicle for disseminating information about Swindon City of Sanctuary and its activities and to enable Swindon City of Sanctuary to run its projects and campaigns and to help us keep track of those who help support our work.

Our application forms specifically asks members to opt in to receiving information from Swindon City of Sanctuary

Each electronic newsletter provides the option to unsubscribe.

Data removal and archiving

Our supporters can unsubscribe at any time from receiving our newsletters and information on that person will be deleted with immediate effect.

With personal information on guests and hosts on our hosting scheme 'Room for All' we have an archived file which gets reviewed annually, information is kept for two years in case there is a legal need in a previous guests asylum case for example we may need to provide evidence of their stay within our hosting scheme.

Our CRM system (Insightly) and the data held within it is reviewed annually. Anyone wishing to be deleted from our system can however let us know at any time and their information will be deleted.

ADOPTED (date)
November 2019