

Data Protection Policy and Procedures

Definitions

1. **Personal data** is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.
2. **Data protection** is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

Responsibility

1. Overall and final responsibility for data protection lies with the Trustees of Pepper's- A Safe Place who are responsible for overseeing activities and ensuring this policy is upheld.
2. All volunteers, trustees and staff are responsible for observing this policy, and related procedures, in all areas of their work for the group.

Policy statement

Pepper's- A Safe Place needs to keep personal data about its committee, members, volunteers and supporters in order to carry out group activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with data protection law and other relevant legislation.

We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

We will only collect, store and use data for:

- purposes for which the individual has given explicit consent, or
 - purposes that are in our group's legitimate interests, or
 - contracts with the individual whose data it is, or
 - to comply with legal obligations, or
 - to protect someone's life/ wellbeing, or
 - to perform public tasks.
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- We will provide individuals with details of the data we have about them when requested by the relevant individual.
 - We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons or to comply with our safeguarding policy.
 - We will endeavour to keep personal data up-to-date and accurate.
 - We will store personal data securely.

- We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
- We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
- To uphold this policy, we will maintain a set of data protection procedures for our Trustees, staff and volunteers to follow

Data Protection Procedures

Introduction

1. Pepper's- A Safe Place has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

General procedures

1. Data will be stored securely. When it is stored electronically, it will be kept on a password protected device. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with data protection law. When it is stored on paper it will be filed carefully with restricted access.
2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
3. We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

Mailing list

1. We will maintain a mailing list. This will include the names and contact details of people who wish to receive publicity and fundraising appeals from Pepper's- A Safe Place.
2. When people sign up to the list we will ask them to give consent to receive publicity and fundraising messages.
3. We will provide information about how to be removed from the list with every mailing.

Supporting individuals

1. From time to time, individuals contact the organisation to ask us to help them resolve an issue they are having with their mental health.
2. We will not keep information relating to an individual's personal situation for any longer than is necessary for the purpose of providing them with the support they have requested.
3. Details relating to individual's circumstances and housing will be treated as strictly confidential.

Contacting volunteers

1. Local people volunteer for Pepper's- A Safe Place in a number of ways.
2. We will maintain a list of contact details of our recent volunteers.
3. People will be removed from the list if they have not volunteered for the group for 12 months.
4. When contacting people on this list, we will provide a privacy notice which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.
5. To allow volunteers to work together to organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

Employees

1. We employ two staff members at Pepper's- A Safe Place
2. We will keep a record of our employees contact details and will remove this if they have not worked for the group for 12 months.
3. Our employees will use a business email address and phone number.
4. We will only contact them on their personal devices with explicit consent.

Donors

1. We may receive monetary or goods donations from individuals or businesses.
2. We will not add them to our mailing list without their consent.
3. If they would like to remain anonymous we will not keep their details on our records.
4. We will only contact them in relation to their donation, as appropriate.

Contacting Trustees

1. The trustees need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
2. Trustees' contact details will be shared among each other.
3. Trustees will not share each other's contact details with anyone outside of the trustees, or use them for anything other than Pepper's- A Safe Place business, without explicit consent.

8) Review

These procedures will be reviewed annually.

Last review date 01/04/2024

Next Review Date 31/03/2025