

# **Safer and Supportive Salisbury Privacy, Data Protection and Safeguarding Policy**

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## **Background**

Safer and Supportive Salisbury works together towards creating a safe, supportive and inclusive community for everyone who lives or works in the city and for all visitors to Salisbury and surrounding areas. Safer and Supportive Salisbury (SaSS) is a totally independent, non-political, not for profit membership networking organisation. Our members all represent local community groups or charities or are active in the Salisbury area as individual volunteers. The organisation undertakes or facilitates action to influence and shape outcomes that support our aims, fostering a community spirit and make Salisbury and South Wiltshire a better place to live and work.

## **Key Principles**

- 1 We will treat all those with whom we work and interact with dignity and respect
2. We will be non-sectarian and not show any religious or party political affiliation
3. We will maintain confidentiality of all personal materials and information with which we are entrusted
4. We will only make public, publish or otherwise divulge materials and information with agreement and full informed consent by those who provide it
5. We will work with all who share our objectives in the furtherance of the group's work

## **Introduction**

The aim of this document is to provide guidance and protection for members of Safer and Supportive Salisbury, volunteers and participants in the project to ensure their privacy, security of their personal information and safeguarding of their person. All who work with SaSS will be required to adhere to the contents of this document.

## **Data Protection Policy**

All personal data should be processed in accordance with the legislation and this policy. Processing includes obtaining, holding, maintaining, storing, erasing, blocking and destroying data.

Personal data is data relating to a living individual. It will not include data relating to a company or organisation, although any data relating to individuals within companies or organisations may be covered. Personal data can be factual (for example a name, address or date of birth) or it can be information about that person, their employment, actions and behaviour.

Examples of personal data are names and addresses and other information relating to individuals, any third party data and any recorded information including any recorded telephone conversations, videocalls or emails

Individuals should only process data if they have consent to do so.

Individuals who process data on the project have a responsibility for processing personal data in accordance with the legislation. Anyone who has responsibility for processing personal data must ensure that they comply with the data protection principles in the legislation. These state that personal data must:

- be obtained and used fairly and lawfully;
- be obtained for specified lawful purposes and used only for those purposes;
- be adequate, relevant and not excessive for those purposes;
- not be kept for any longer than required for the project and set out below;
- be used in a way which complies with the individual's rights (this includes rights to prevent the use of personal data which will cause them damage or distress, to prevent use of personal data for direct marketing, and to have inaccurate information deleted or corrected);
- be protected by appropriate technical or organisational measures against unauthorised access, processing or accidental loss or destruction;
- not be transferred outside the UK unless with the consent of the data subject or where the country is determined to have adequate systems in place to protect personal data.

## Data Retention Policy

We will take appropriate technical and organisational steps to guard against unauthorised or unlawful processing. Access to such records will be restricted.

Where personal data needs to be deleted or destroyed adequate measures will be taken to ensure data is properly and securely disposed of. This will include destruction of files and back up files and physical destruction of manual files. Any manual sensitive data will be shredded.

All data will be stored in a secure location and precautions will be taken to avoid data being accidentally disclosed.

## Data Breach

Every care is taken to protect the data we hold. Compromise of information, confidentiality, integrity or availability may result in harm to individuals, reputational damage, detrimental effect on service provision, legislative non-compliance and financial penalties.

An incident includes but is not restricted to:

- Loss or theft of personal data or the equipment on which the data is stored e.g. laptop, memory stick, smartphone, or paper record
- Theft or failure of equipment on which personal data is stored
- Unauthorised use of or access to personal data
- Attempts to gain unauthorised access to personal data
- Unauthorised disclosure of personal data
- Website defacement
- Hacking attack

Should any data breach occur, this will be immediately reported to the **SaSS safeguarding officer**. They will investigate the breach and should they deem it necessary they will report it to **WHO??**. Appropriate steps will be taken immediately to minimise the effects of the

breach. An assessment will be carried out to establish the severity of the breach and the nature of further investigation required. Consideration will be given as to whether the police should be informed. Advice from appropriate experts will be sought if necessary. A suitable course of action will be taken to ensure a resolution to the breach.

## **Data Complaints Process**

Members of SaSS take your privacy concerns seriously. If you have any concerns about the way your information is being handled, please contact the SaSS chair Anne Trevett without delay. Contact details as follows:

Email address [anneinbemerton@gmail.com](mailto:anneinbemerton@gmail.com)

We will carefully investigate and review all complaints and take appropriate action in accordance with data protection legislation. We will keep you informed of the progress of our investigation and the outcome. If you are not satisfied with the outcome, you may wish to contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **Information Security Policy**

All appropriate technical and organisational methods will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. All data will be stored in a secure location and precautions will be taken to avoid data being accidentally disclosed.

## **Privacy Notice**

Your privacy is important to us. We are committed to safeguarding the privacy of your information.

We collect your personal data to help us to develop the group, its projects and to communicate with you. We will only make public, publish or otherwise divulge materials and information with your agreement and your full informed consent. In furtherance of the group and its projects and with your informed consent, we may collect:

- Personal information (such as name, date of birth, address, telephone number and email address).
- Characteristics (such as gender, ethnicity, language, nationality, country of birth).

We need to use your personal information to make and maintain contact with you in the furtherance of the group and its project. We will not share your information with third parties without your consent unless the law requires us to do so.

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information contact the SaSS administrator at [sassalisbury5@gmail.com](mailto:sassalisbury5@gmail.com).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and

- claim compensation for damages caused by a breach of the Data Protection regulations.

Under the Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights on the ICO website – see link below:  
<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. We have a separate website privacy notice which can be found here **ADD LINK HERE**

## Confidentiality

Confidential information is information entrusted by an individual in confidence, where there is general obligation not to disclose that information without consent. Information will be disclosed to those who have a legitimate need to know in order to fulfil aspects of the project. Confidential information may include personal information such as name, age, address, personal contact details and details of employment past or present.

An accepted principle is that all personal information must be treated as confidential so we will not disclose this to others or on social media to protect your interests and safety.

## Volunteer Policy

Each volunteer will sign our **volunteering agreement**, by which we are bound to ensure:

- A safe, respectful, fair and non-discriminatory volunteering environment.
- A clear explanation of what your role involves, what is expected of you and who you need to speak to if you need support
- The ability to stop volunteering with us without pressure or judgement

The volunteer is bound to:

- Send a photocopy of his/her DBS check through to the SaSS administrator
- Perform the volunteering role to the best of his/her ability
- Be accountable for his/her actions
- Support and abide by SaSS instructions within the documents provided
- Respect and maintain confidentiality, keeping any information gained about the organisation, its services and the individual clients, confidential, even after the project has ended.

## Safeguarding Policy

We recognise the need to ensure that everyone who takes part in the group and its projects has a right to feel safe and to be safeguarded from harm, abuse or distress of any kind. We will ensure that all your personal rights to privacy are respected and we will not disclose any information or materials that you ask us not to. We ask you to tell us if there are actions we can take to ensure your interests and your personal security are safeguarded.

Several members of SaSS are fully DBS checked, and should the need arise for you to be visited or accompanied alone we will ensure that either a DBS checked SaSS member carries out this activity, or accompanies the other SaSS member, if another chaperone cannot be available.

## **DURING COVID 19 PANDEMIC**

We will not visit the homes of those volunteering to help with SaSS projects during this time, or those requesting help and support from SaSS unless specifically asked to do so by the individual. Wherever possible contact will be made by phone, e mail and online technology (eg Skype, Zoom, etc). If there is a need to visit your home/other designated location (eg workplace), at all times the SaSS member will adhere to current public health guidelines, maintaining a minimum of 2 metres distance between themselves and you. The SaSS member visiting the home, will ensure that he/she has a correctly fitted mask, disposable gloves and antibacterial handwash at all times.

For the volunteer's protection and the protection of his/her client, we expect each volunteer to adhere to the following rules:

### **DO**

- Show your **SaSS ID card** to assure the beneficiary that you are an SaSS Volunteer.
- If requested please present your current DBS certificate.
- Keep any data/personal information secure and treat other people's information in the same way you would want yours to be treated.
- Treat others the way you would want to be treated yourself
- Respect everyone regardless of who they are, their backgrounds and the communities in which they live
- Be alert to any signs or patterns of abuse or anything that may concern you and always raise your suspicions to the SaSS team.
- Conduct as much of the session as possible via telephone or outside. If there is a need to enter the client's home you must adhere to current public health guidelines, maintaining a minimum of 2 metres distance.
- Wear a correctly fitted mask and disposable gloves (if feasible). Wash your hands as frequently as possible and use hand sanitisers or wipes.
- Ensure that any equipment being used by you and the beneficiary, is cleaned each time it is passed between you.
- Inform the beneficiary immediately, if you are not able to support them on the date and at the time, agreed.

### **DO NOT**

- Discuss any information or data with anyone outside the project team at SaSS
- Retain the client's passwords. Ensure that they have recorded them in a safe place.
- Take the client's bank card to pay for shopping.
- Exchange bank details with your client

## Gaining Informed Consent

Before we collect data about you, we will seek fully informed consent from you to do so. Please read this policy and feel free to ask the SaSS member any questions of clarification if anything is not clear to you.

Signed by:

Dated:

To be reviewed **WHEN?**

DRAFT